2025 Sustainability Report

Extract from the 2025
Universal Registration Document

EssilorLuxottica

Empowering Humans.

2025 Sustainability Report

Content

1 General Disclosures

Sustainability at EssilorLuxottica

Doing good for its employees, customers, consumers and communities while doing good for the planet is at the core of EssilorLuxottica's Eyes on the Planet sustainability program. Its commitment to carbon emissions reduction, circularity, world sight, inclusion and ethics reaffirm how its Mission, sustainability and business strategy are closely intertwined.

The Eyes on the Planet program spans climate action, responsible water stewardship, a culture of health & safety, equal opportunities for all and engagement with local communities, creating a positive impact along the value chain.

Through its sustainability strategy and the philanthropic work of the OneSight EssilorLuxottica Foundation, the Company helps drive progress on 13[1] of the 17 UN Sustainable Development Goals (SDGs) that form the 2030 Agenda. In addition, the UN General Assembly resolution on vision[2] further supports EssilorLuxottica's own ambition to eliminate uncorrected poor vision in a generation.

Eyes on the Planet program
with 5 strategic pillars

External recognition
MSCI ESG rating of AAA, constituent of the Dow Jones Best-in-Class Europe Index, included on the FT Diversity Leaders list, recognized on the CDP Climate A-list and rated A- for Water Security, Silver Medal[3] in the EcoVadis assessment

SBTi validation
of near-term emissions reduction targets

65% renewable energy
in the Group's 2025 energy mix

67% waste valorized
in 2025

Responsible materials
52% of collections launched in 2025 having alternative materials

New 2030 single-use plastic packaging targets

200,000+ employees
60% women and
35% women senior executives

Your Voice listening program
140,000 employees involved
80% participate rate

Up to 97,000
employee shareholders

12 million+
Leonardo education hours since 2021

7,300+ employees volunteering
vs. 5,500 in 2024

100 million+
people in underserved communities equipped with eyeglasses

1 billion+
people with permanent access to vision care since 2013

OneSight EssilorLuxottica Foundation
collaboration with World Health Organization
to advance global vision care under SPECS 2030 Initiative

(1) *SDG 3 "Good health and well-being", SDG 4 "Quality education", SDG 5 "Gender equality", SDG 6 "Clean water and sanitation", SDG 7 "Affordable and clean energy", SDG 8 "Decent work and economic growth", SDG 9 "Industry, innovation and infrastructure", SDG 10 "Reduced inequalities", SDG 11 "Sustainable cities and communities", SDG 12 "Responsible consumption and production", SDG 13 "Climate action", SDG 16 "Peace, justice and strong institutions" and SDG 17 "Partnerships for the goals".*
(2) *UN General Assembly resolution "Vision for Everyone: accelerating action to achieve the Sustainable Development Goals" available at un.org.*
(3) *For more information please refer to Ecovadis Silver Medal | ESSILORLUXOTTICA SA.*

Eyes on the Planet, EssilorLuxottica's Sustainability Program

Rooted in its Mission and business strategy, the Company's Eyes on the Planet sustainability program underscores the commitment to driving meaningful and lasting change for people and the planet. First presented in 2021, Eyes on the Planet has progressively evolved from commitment to a pragmatic mindset focused on actionable, measurable outcomes, embedding environmental and social responsibility into everything the Group does.

Each pillar of the program (Carbon, Circularity, Ethics, Inclusion and World Sight) is a hub of innovation and collaboration, with initiatives that usually start as pilot projects and then become best practices for the benefit of the Group and the local communities where it is present.

Through Eyes on the Planet, EssilorLuxottica strives to:

- minimize the environmental footprint of the Group's operations, products and services by responsibly using natural resources and raw materials (Eyes on Carbon and Eyes on Circularity);
- inspire collective action, empowering partners, consumers and the industry to be catalysts for change (Eyes on Inclusion and Eyes on Ethics);
- shape a better world, addressing global environmental and social challenges with purpose (Eyes on World Sight).

By so doing, sustainability is deeply integrated in the Company's culture and business model.

Minimizing the environmental footprint:

- Eyes on Carbon: by enhancing energy efficiency, increasing on-site production and use of renewable energy, optimizing its supply chain and strengthening stakeholder engagement on climate, the Company has taken actions to reduce its carbon footprint. A key early step in addressing climate change is the carbon neutrality goal the Company set for its Scope 1 and 2 emissions, achieved in Italy and France in 2021 and in Europe in 2023. In 2024, SBTi validation of its 2030 carbon emissions reduction targets marked a new key milestone and became the priority in EssilorLuxottica's climate strategy, focusing on emissions reductions within its operations and value chain – Scopes 1, 2 and 3 – in alignment with the latest climate science and the goals of the Paris Agreement.
- Eyes on Circularity: at EssilorLuxottica, sustainability is integrated into every stage of product and service development. From the earliest design phases, the Company strives to optimize resource use while maintaining the highest quality standards. Key priorities include: i) transitioning from fossil-based to bio-based and recycled materials; ii) embedding eco-design principles across all innovation projects; iii) increasing waste valorization and iv) reducing single-use plastic packaging. Additional efforts include increasing internal recycling capabilities and implementing circular services that extend product life or give products a second life.

Inspiring collective action:

- Eyes on Ethics: EssilorLuxottica's vertically integrated business model is the key to delivering and ensuring a fair and ethical business approach wherever it has a presence. The Company's Code of Ethics and Business Partners' Code of Conduct establish harmonized practices and protect human and labor rights across its entire value chain, as per the International Bill of Human Rights and ILO Conventions. Core priorities include: data privacy, transparent communication, responsible sourcing and unwavering quality.
- Eyes on Inclusion: The Company is committed to cultivating a culture grounded in learning, diversity and safety, while ensuring a work environment that offers equal opportunities to all – based on merit and free from discrimination of any kind. Global and local awareness-raising initiatives include campaigns on the Leonardo learning platform and the celebration of key moments such as International Women's Day, Mental Health Awareness Month, Pride Month, EssilorLuxottica DE&I Week and the International Day of Persons with Disabilities. Together, these initiatives reflect EssilorLuxottica's ongoing commitment to promoting understanding, dialogue and inclusion across the organization worldwide.

Shaping a better world:

- Eyes on World Sight: Driven by the belief that good vision is a fundamental human right, the Group has an ambition to eliminate uncorrected poor vision in a generation and make vision care accessible to everyone, everywhere. This responsibility is embedded in corporate citizenship initiatives, such as advocacy for vision care in underserved communities through the OneSight EssilorLuxottica Foundation. Recognized for its global impact, EssilorLuxottica earned a spot in Fortune magazine's "Change the World" list for the fifth time. In addition, the Company continues its pledge to making art accessible for all through the Eyes on Art initiative.

By advancing its Eyes on the Planet program, EssilorLuxottica involves the entire organization in meaningful and lasting change for people and the planet.

1.1 Basis for Preparation

1.1.1 General Basis for Preparation of Sustainability Statements

EssilorLuxottica's sustainability report has been prepared as part of the second application of the legal and regulatory requirements following the transposition of the European Corporate Sustainability Reporting Directive (CSRD) and in accordance with the ESRSs issued. This consolidated sustainability report has been prepared under the responsibility of the Board of Directors and refers to the 2025 fiscal year (January 1 – December 31, 2025). It was approved and authorized for issue on February 11, 2026.

The principle of double materiality – encompassing both financial materiality and impact materiality as defined by the ESRSs – forms the foundation of the Company's sustainability reporting approach.

In this Sustainability Report, as of December 31, 2025, the Group provides disclosures aligned with the material requirements set forth by the ESRSs, addressing topics that are most relevant to its stakeholders and essential for transparent reporting.

Boundaries of the sustainability report

The perimeter considered for the consolidation of the sustainability information follows the same consolidation principles as the consolidated financial statements and comprises the parent company EssilorLuxottica and its subsidiaries. Given the specificity of the Group's retail network, franchise operations are not included, consistent with the absence of operational control.

As an exception to the above principle, Optegra, Optical Investment Group, A-Look Group and other 2025 minor acquisition are excluded from the Company's 2025 sustainability reporting (as well as from the double materiality analysis) as their acquisitions was finalized at the end of 2025 and left insufficient time for the Company to analyze impacts, risks and opportunities, and prepare related relevant and reliable sustainability information.

The value chain items addressed in this sustainability report include both upstream and downstream actors and their activities in relation to the Group's vertically integrated business model as described in 1.3.1 *Strategy, Business Model and Value Chain*. However, it should be noted that the preparation of sustainability information has been made complex by the absence of comparative data and reliable benchmarks, particularly at sector level, as well as by difficulties in collecting market data, especially within the value chain. As a result, the information related to the value chain has been determined making reasonable effort to do so.

Uncertainties related to a dynamic regulatory context

The second year of CSRD implementation continues to be marked by significant uncertainties. The combined effect of recent regulatory adjustments – including the Stop-the-Clock Directive, the ESRS "quick-fix" measures, the Omnibus simplification package, the simplification of EU Taxonomy Rules and national transpositions – requires companies to remain highly vigilant and adaptable as the regulatory landscape evolves.

Thus, the preparation of the sustainability report is based on the knowledge, data, normative interpretations and information available on its preparation date. Like other companies subject to the CSRD, EssilorLuxottica may improve its understanding of ESRS requirements when additional guidance, interpretations and/or market practices become available. The Group may then, if necessary, adapt certain reporting and communication practices, in a continuous improvement approach to align with best practices and stakeholder expectations.

Judgment and use of estimates

As explained in the Methodology Note (please refer to Section 6 *Methodology Note* for more details) and under quantitative data tables, preparation of the sustainability report requires management's use of judgment, extrapolations and estimates based on the current state of scientific knowledge. Estimates may also be refined in future reporting periods when more relevant information becomes available. Key interpretations, uncertainties, the main judgments and assumptions are clarified, when necessary, in the related note taking into consideration the methodological limitations related to the preparation of certain environmental indicators, including Scope 3 emissions.

EssilorLuxottica's Transition Plan for Climate Change Mitigation provides an understanding of the Group's past, current, and future mitigation efforts to ensure the compatibility of its strategy and business model with the transition to a sustainable economy (see Section 2.1.3 *Transition Plan for Climate Change Mitigation*).

The two following data points are critical or confidential for the Group and, as such, are not disclosed in this sustainability report: Operating Expenses related to the OneSight EssilorLuxottica Foundation due to ongoing collaborations and total weight of products and of secondary reused or recycled components due to innovative projects development.

Besides, the Company has implemented control procedures to prevent any double counting of information, particularly for indicators that may be aggregated from multiple internal sources, in order to ensure the consistency, accuracy and comparability of the data published in accordance with ESRS requirements.

Reporting process

Although EssilorLuxottica has established an internal control process over sustainability reporting (refer to Section 1.2.5 *Risk Management and Internal Controls over Sustainability Reporting*), certain processes are still being strengthened. Over the coming years, the Group will continue to further improve the reliability of certain indicators and develop new processes to gather information that is not centrally available. As of December 31, 2025, and for these reasons, some datapoints are not yet reported or are disclosed only partially.

This applies specifically to the following metrics, which are not consolidated at Group level:

- Pollution (ESRS E2): substances of concern/high concern, microplastics,
- Own Workforce (ESRS S1): operating expenses (current financial resources allocated to action plans),
- Business Conduct (ESRS G1): percentage of functions-at-risk covered by anti-bribery and corruption training programs. With regard monetary metrics for payment practices, in 2025 the Group deployed a new tool to support data collection and monitoring. The implementation and integration of this tool across the Group's entities was still ongoing at year-end.

These indicators are monitored and tracked locally where relevant. However, they are not consolidated centrally primarily due to regulatory differences across regions and/or countries. In this context, relying on estimates would risk generating figures that lack the required level of reliability. Therefore, the Group is assessing the relevance and materiality of these KPIs, also in light of evolving disclosure obligations. When deemed necessary, appropriate processes for tracking, reporting, controlling and consolidating this information will be implemented.

As for resource use and circular economy (ESRS E5) – specifically, the rate of recyclable content in product packaging – this metric is not disclosed because the methodology set by the European Union Packaging and Packaging Waste Regulation (PPWR) has not yet been released.

In addition, the ratio between the total annual remuneration of the highest-paid individual and the median total annual remuneration of all employees (excluding the highest-paid individual) has been calculated in accordance with AFEP/MEDEF guidelines and is therefore reported for the French reporting scope (see Section 4.3.3 *AFEP-MEDEF Compensation and Benefits Tables of the 2025 Universal Registration Document*).

The Company is continuously investing in its sustainability activities; nevertheless, based on the results of its materiality assessment, Capital Expenditure (CapEx) and Operating Expenses (OpEx) related to the following topics have been assessed as not significant (as mentioned in 2.1.5 *Actions and Resources*) and are therefore not disclosed in this report:

- Climate change (ESRS E1);
- Pollution (ESRS E2);
- Water and marine resources (ESRS E3);
- Resource use and circular economy (ESRS E5);
- Workers in the value chain (ESRS S2);
- Consumers and end-users (ESR S4);
- Business conduct (ESRS G1);

as well as:

- CapEx related to Own Workforce (ESRS S1);
- CapEx related to Affected Communities (ESRS S3).

Finally, the targets presented in this document are voluntary unless expressly stated otherwise.

1.1.2 Disclosures in Relation to Specific Circumstances

As explained in the Methodology Note (Section 6 for more details) and in quantitative ESG data tables, extrapolations and estimates are used for the reporting of some datapoints when necessary. The main judgments and assumptions are then clarified. Should changes in the preparation and presentation of sustainability information or modifications of data occur compared to the previous reporting period, this is clarified under the associated tables.

The Universal Registration Document (URD) provides a comprehensive view of EssilorLuxottica's strategy, businesses, governance and financial statements, as well as its sustainable development strategy and performance. The Group business model and strategy are presented in Chapter 1. The approach as a whole and all aspects generally relating to risks are presented in Chapter 2. The whole of Chapter 4 is dedicated to Corporate Governance.

The Vigilance Plan pursuant to Article L.225-102-4 of the French Commercial Code is included in Chapter 2 of the 2025 Universal Registration Document. The Plan contains the rules applied to prevent the risk of serious adverse impacts on Human Rights and Fundamental Freedoms, the Health & Safety of people and the environment resulting from the activities of EssilorLuxottica, its subsidiaries and suppliers.

1.2 Governance

1.2.1 The Role of the Administrative, Management and Supervisory Bodies

As at December 31, 2025, EssilorLuxottica's Board of Directors comprised 14 Directors, including two members representing employees. The Directors have a three-year term of office (except for some Directors appointed in 2024 for shorter periods, in order to implement a staggering of the Directors' terms of office, as explained in Section 4.1.1.1 *Composition of the Board of Directors at December 31, 2025* of the 2025 Universal Registration Document). Any new member of the EssilorLuxottica Board of Directors is nominated for election at EssilorLuxottica's Shareholders' Meeting by the EssilorLuxottica Board of Directors based on the recommendation of the EssilorLuxottica Nomination and Compensation Committee or any EssilorLuxottica shareholder in accordance with applicable law.

As explained in Chapter 4 of the 2025 Universal Registration Document, the Directors come from different backgrounds and they complement one another due to their different professional experience, their skills and their international exposure. The Company abides by the principle of a diverse and balanced gender representation on the Board, which includes:

- seven independent Directors within the meaning of the AFEP-MEDEF Code (58.33% of Directors);
- two executive directors (14.28% of Directors);
- two directors representing employees;
- six women, i.e., approximately 43% of the EssilorLuxottica Board of Directors; and one in three Board Committees is chaired by a woman;
- five nationalities (French, German, Indian, Italian and Monegasque).

Directors' expertise and skills on sustainability topics are described in Section 4.1.1.2 of the 2025 Universal Registration Document.

The dynamism and relevance of sustainability issues, and especially those related to climate change, make it essential for the Board of Directors to be regularly updated. The Board acknowledges the information provided by the CSR and the Audit & Risk Committees following every committee meeting and reviews:

- the Climate roadmap, with a focus on the progress against announced decarbonization targets, actions and investments;
- the Company's Eyes on the Planet sustainability program, whose execution also draws upon the material topics identified during the Double Materiality Assessment and associated impacts, risks and opportunities;
- the Long-term Incentive Plan, which also includes sustainability criteria linked to the reduction of carbon emissions consistent with the Science-Based Targets roadmap;
- the Universal Registration Document (including the Sustainability Report) and the Interim Financial Report (including the Mission & Sustainability first-half update).

To strengthen knowledge on sustainability reporting requirements and on the concrete application of the Double Materiality Assessment within the Company's sustainability strategy, Directors are periodically involved in Board induction sessions on specific sustainability topics held by the management of the relevant functions and third-party experts. For other information on the composition, expertise and skills of Directors, please refer to Chapter 4 of the 2025 Universal Registration Document.

EssilorLuxottica's Board of Directors oversees sustainability strategy and execution as per the Eyes on the Planet program, including the assessment and management of sustainability impacts, risks and opportunities (IROs). In this regard, the Chief Corporate Sustainability Officer and other managers actively involved in sustainability provide regular updates to the Board and its committees on environmental, social and governance matters.

- Corporate Social Responsibility (CSR) Committee: its main duty is to ensure that the Group effectively addresses the deployment of its Mission, which is fully integrated in its strategy. The CSR Committee also addresses the deployment of the Group's Eyes on the Planet sustainability program. As detailed in Chapter 4 of the 2025 Universal Registration Document, CSR Committee duties go beyond philanthropy, sustainable programs and compliance to address how the Company manages its economic, social and environmental impacts as well as its relationships with stakeholders.
- Audit and Risk Committee: its main duties include ensuring the integrity of the financial statements and reviewing the risk assessment and risk management processes, including ESG risks, information security, cybersecurity risks organization and related risk-based strategy are also topics reviewed by the Committee. In addition, the CSR Committee coordinates its work with the Audit and Risk Committee in carrying out its oversight of corporate processes aimed at identifying and managing sustainability issues and the corresponding impacts, risks and opportunities (IROs). To this regard, following two joint meetings with the CSR Committee also attended by the Group's Chief Corporate Sustainability Officer in 2025, the two committees updated the Board of Directors on the Double Materiality Assessment, the sustainability reporting process and the external recognition achieved by the Company's ESG disclosures, as reflected in its ratings. The launch of an internal Human Rights taskforce led by Compliance and Corporate Sustainability was also addressed.
- Nomination and Compensation Committee: its main duties include the assessment of company and executive performance, including the definition of the sustainability criterion for the long-term incentive scheme in connection with the Eyes on the Planet program and the assessment of its achievement rate.

To learn more about the Committees of the Board of Directors, refer to Chapter 4 of the 2025 Universal Registration Document.

The EssilorLuxottica Corporate Sustainability function directly reports to the Chairman and Chief Executive Officer and leads efforts on environmental and social challenges while enhancing the development of its Company-wide sustainability strategy and program Eyes on the Planet.

In this respect, the Corporate Sustainability function involves and coordinates with other departments, functions, business units and brands in the execution and development of the Group's Eyes on the Planet sustainability program at global and local levels in a way that is consistent with EssilorLuxottica's Mission and business strategy. By so doing, the Group's sustainability commitments and goals are translated into practical action plans that are regularly reviewed and updated according to the five "Eyes on" pillars of the program (Carbon, Circularity, Ethics, Inclusion and World Sight).

Nine sustainability professionals reporting to the Chief Corporate Sustainability Officer assist the different functions, business units, brands and subsidiaries with the implementation of the Eyes on the Planet program and activate the necessary synergies. In addition, most functions and business units have a sustainability contact person, while the Operations function has a specific Sustainability team dedicated to Product and Operations Sustainability. As a result, EssilorLuxottica currently has a network of more than 120 professionals dedicated to sustainability projects and initiatives. This number is expected to grow as the Corporate Sustainability function extends the implementation of the Eyes on the Planet program to additional departments, business units and subsidiaries in alignment with the sustainability strategic priorities identified through the Double Materiality Assessment that was conducted in 2024.

Role and expertise of administrative, management and supervisory bodies related to business conduct

The Board of Directors determines the direction of EssilorLuxottica's business, oversees its implementation and is responsible for ensuring that the highest standards of responsible business conduct and the principles set in the Code of Ethics are applied throughout the Group.

Subject to the powers expressly granted to the Shareholders' Meeting, the limitations set forth in the bylaws of EssilorLuxottica and within the limits of the corporate purpose, the Board of Directors deals with all matters concerning the proper management of EssilorLuxottica and its Group, in accordance with the Board of Directors' Internal Rules. Upon the proposal of the Company's management, the Board of Directors determines the Company's multi-annual strategic guidelines on social and environmental responsibility.

The balance of power within the Company's bodies is ensured by the composition of the Board of Directors and its committees, which comprise a high proportion of independent Directors and members having a wide diversity of profiles and skills, as shown in Section 4.1.1.2 *Expertise and Skills of Directors* of the 2025 Universal Registration Document.

With reference to business conduct, the Group's CSR and Audit & Risk Committees, Compliance department and whistleblowing procedure for employees and third parties ensure that EssilorLuxottica's Code of Ethics and Business Partners' Code of Conduct are respected and duly applied. The CSR Committee reviews and monitors the Company's policies on compliance and ethics matters and the systems and procedures in place to implement these policies and provides the Board of Directors with its views.

The CSR Committee is notably responsible for making recommendations to the Board of Directors for the following:

- to review the definition of the Group's core values and ethics and compliance policy;
- to review and put forward proposals to promote the corporate culture and employee shareholding;
- to promote ethics and ensure harmonization of ethical rules within the Group's entities and monitor their compliance thereto; it reviews the organization of the Compliance function and makes recommendations if any;
- to review the Group's Code of Ethics, rules and procedures;
- to receive, on an annual basis, the presentation of the Group's risk map concerning ethics and compliance; it reviews the risks thus identified and is kept informed of their evolution and of the characteristics of their management systems.

1.2.2 Information Provided to and Sustainability Matters Addressed by EssilorLuxottica's Administrative, Management and Supervisory Bodies

In 2024, EssilorLuxottica carried out its first Double Materiality Assessment, which is reviewed periodically and will be updated in the coming years. The process was finalized through two workshops with the Group's senior management to validate the methodology and confirm or adjust the materiality of sustainability Impacts, Risks and Opportunities (IROs).

The Chief Corporate Sustainability Officer regularly informed the CSR and Audit & Risk Committees on the assessment's outcomes and the progress of the annual sustainability reporting campaign through dedicated presentations.

The Board of Directors acknowledged these updates and validated the material topics, material IROs and their representation in this document.

Given the evolving sustainability reporting requirements, joint meetings of the CSR and Audit & Risk committees are scheduled on a regular basis to review progress on sustainability reporting, the deployment of the Company's Eyes on the Planet program, and the management of material impacts, risks and opportunities. This ensures that Directors and the Board maintain a clear understanding of EssilorLuxottica's environmental, social and ethical priorities and can integrate them into strategic decisions, including major transactions and M&A deals. For specific compliance matters, training sessions with external experts are also evaluated as advised by the Chief Corporate Sustainability Officer and the General Counsel.

1.2.3 Integration of Sustainability-Related Performance in Incentive Schemes

The remuneration policy for corporate officers is defined by the Board of Directors based on recommendations from the Nomination and Compensation Committee and embeds sustainability considerations aligned with the Group's strategic priorities in this area, as presented in Chapter 4 of the 2025 Universal Registration Document.

Since 2024, the long-term incentive plan has included a corporate social responsibility (CSR) criterion, introduced on the recommendation of the Nomination and Compensation Committee and approved by the Board of Directors. In addition to share price performance, the plan now incorporates a financial objective and a CSR commitment. Performance conditions include a specific indicator reflecting the Group's long-term climate strategy, aligned with its Eyes on the Planet sustainability program. The inclusion of the CSR criterion reinforces the Company's commitment to sustainability over the long term.

According to the 2025-2028 long-term incentive plan presented in Chapter 4 of the 2025 Universal Registration Document, the CSR criterion represents 20% of the vesting criteria. The selected criterion is the total carbon emissions level in 2027 in line with EssilorLuxottica's climate roadmap.

The assessment scale for this criterion has been defined by the Board of Directors, in line with the science-based carbon reduction targets validated by the Science-Based Targets initiative, and is reported in Chapter 4 of the 2025 Universal Registration Document. The targeted emissions include all the Group's Scope 1 (direct) and Scope 2 (purchased energy) emissions and the Scope 3 (indirect) emissions deriving from i) purchased goods and services (not including Equipment, Instruments and Wearables sub-categories), ii) fuel- and energy-related activities, iii) upstream transportation and iv) waste generated in Operations. In addition, EssilorLuxottica integrates ESG metrics into annual incentive schemes – from water and waste metrics to DE&I and culture goals – for those functions that are involved in the Eyes on the Planet execution.

1.2.4 Statement on Due Diligence

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	2.3 *EssilorLuxottica Vigilance Plan* p. 108 of the 2025 Universal Registration Document
b) Engaging with affected stakeholders in all key steps of the due diligence	
c) Identifying and assessing adverse impacts	
d) Taking actions to address those adverse impacts	
e) Tracking the effectiveness of these efforts and communicating	

1.2.5 Risk Management and Internal Controls over Sustainability Reporting

As part of its commitment to mitigate environmental, social and governance risks, the Group has integrated the analysis of risks related to sustainability topics into the annual risk assessment process conducted by the Risk Management function. The main characteristics of the risk management and internal control systems implemented by the Company as well as the description of the main risks identified that may affect the Group, which include Reporting & Communication risk, are presented in Chapter 2 of the 2025 Universal Registration Document.

The Corporate Sustainability function is responsible for the preparation of the EssilorLuxottica consolidated sustainability report. It facilitates and coordinates the different functions contributing to the sustainability reporting such as Human Resources, Environment, Health & Safety, Leonardo, Operations & Product Sustainability, Compliance and Quality. The Corporate Sustainability function issues the reporting protocol that includes instructions and timelines to ensure a consistent and reliable data and consolidation process. Besides, the open communication line with the different functions involved allows the understanding and analysis of the sustainability data and enables consistency in the calculation approaches including estimations. Regular meetings are organized with these functions to improve the reporting processes. In addition, to ensure the robustness of the sustainability reporting process, specific controls and/or audits are performed by the Internal Control and Internal Audit functions as second and third lines of defense, on strategic topics for the Group. Ad-hoc action plans have been jointly defined by the Corporate Sustainability function and the relevant functions with the support of Internal Control to address the identified improvement points. New processes have been implemented following these recommendations. The results of the Internal Audit activities related to sustainability reporting are also periodically reported to the Audit and Risk Committee and to senior management.

1.3 Strategy

1.3.1 Strategy, Business Model and Value Chain

EssilorLuxottica is a global leader in advanced vision care solutions, iconic and smart eyewear and groundbreaking medical technologies.

With over 200,000 people in the workforce across 150 countries, more than 600 operations facilities and approximately 18,000 stores, in 2025, the Company generated consolidated revenue of €28.5 billion. Guided by its mission to "Empower Humans", the Group is committed to enhancing the way people experience the world, fostering meaningful connections, and promoting health and well-being while addressing vision needs and personal style. This mission shapes the Group's long-term direction and reflects its ambition to unlock and expand human potential through better sight and enhanced everyday living.

Sustainability is central to EssilorLuxottica's strategy and is embedded throughout its business model. The Group views sustainability not only as a source of long-term value creation and resilience, but also as a responsibility. Environmental stewardship, social responsibility and ethical conduct are integrated into decision-making, innovation and daily operations.

The Company operates an open and collaborative business model, partnering with leading industry players who share its focus on innovation, advanced technologies and high-quality products. Its vertically integrated structure and global presence across regions, business segments and channels position EssilorLuxottica to drive the evolution of the eyewear and eyecare industry, creating value for all stakeholders, including employees, customers, consumers, shareholders, business partners, suppliers and the communities where it operates.

As a fully integrated, end-to-end omnichannel leader, the Group has developed an advanced medical model that brings together eyecare expertise and services. Covering the full continuum of eye health needs – from comprehensive eye exams and diagnostics to therapeutic solutions, disease management and surgical care – the model provides a seamless, digitally enabled patient journey that enhances outcomes and everyday well-being.

This model is supported by a robust platform of strategic assets that span the entire value chain, from design and innovation to manufacturing and distribution. Together, these assets strengthen EssilorLuxottica's competitive advantage and support the integration of sustainability throughout the value chain.

As detailed in Chapter 1 of the 2025 Universal Registration Document, EssilorLuxottica's business model integrates healthcare, technology and lifestyle within a single global platform, supporting a dynamic and future-oriented value creation approach. The model is characterized by vertical integration, a patient-centric and market-expansive orientation, and an open and collaborative operating structure, features that enable the Group to deliver sustainable products and services and to address its material impacts, risks and opportunities across the value chain.

The Group relies on a robust R&D ecosystem, comprising its 51 research and design centers worldwide, supported by its Scientific Advisory Committee and partnerships with leading research institutions. This platform reinforces EssilorLuxottica's role as a laboratory for med-tech and innovation, ensuring a continuous pipeline of advanced solutions.

Innovation is translated into industrial excellence through a diversified global manufacturing network that delivers products and services to more than 500 million patients, consumers and customers every year. The network includes 33 corrective and plano lens mass-production facilities, 555 prescription laboratories and edging-mounting facilities, 14 eyewear manufacturing plants, and a wide distribution infrastructure. This footprint ensures proximity to markets, operational flexibility and consistently high service standards globally.

These production capabilities are backed by a wide-reaching Professional Solutions network, which provides wholesale customers with a distinctive combination of vision-care products, eye-health technologies, iconic brands and advanced digital services.

Professional Solutions are complemented by an extensive global Direct to Consumer network offering deep insight into consumer preferences and providing high-quality products and technologies, expert advice and globally recognized brands. These distribution channels are complemented by branded e-commerce platforms as well as pure digital players.

Internal assets and capabilities

People
- 200,000+ employees, of which 60% women
- ~ 50% below 35 years old

Global footprint
- Manufacturing and logistics facilities, distribution networks and talent across 150+ countries
- 600+ mass production facilities and prescription laboratories

Unique innovation capabilities
- 51 design and R&D facilities
- 16,500+ patents and designs
- ISCC Plus certification for the Circular Economy
- Investing in innovative technologies to manage the end of life of its products

Responsible use of resources
- 2030 science-based emissions-reduction targets covering Scopes 1, 2 and 3
- On-site production and use of renewable energy
- 2030 reduction targets for single-use plastic packaging
- Eco-design principles for all Rx and eyewear innovations

Civil society
- OneSight EssilorLuxottica Foundation
- Art accessibility through Eyes on Art

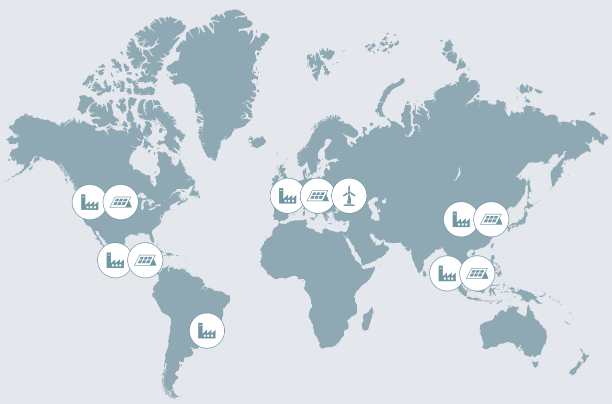
Financial strength
- Stable shareholding structure
- €28.5 bn revenue in 2025
- €2.8 bn free cash flow

A vertically integrated, patient-centric, market-expansive, open and collaborative business model

Components for frames, indirect materials, monomers and resins, lens consumables and materials, finished frames, packaging, AFA (Apparel, Footwear, Accessories), services

Product development

Operations



Supply chain

Professional Solutions

300,000 third-party professionals

Direct to Consumer

~18,000 stores

89 eye clinics

71 e-commerce banners

Patients and consumers

Value creation

People
- Global *Your Voice* survey: global participation rate of 80%
- Up to 97,000 employee shareholders in 85 countries

Global footprint
- Job creation in over 150 countries
- Serving 300,000+ customers worldwide
- Leonardo learning ecosystem accessible to all players in the industry: 4.2 million hours of education delivered in 2025
- 400 WELL-certified stores by 2027

Unique innovation capabilities
- Developed sustainable innovation expertise across materials, processes, products and services
- Partnerships with renowned universities and leading scientific organizations, e.g., Smart Eyewear Lab in Politecnico of Milan, International Myopia Institute
- In-store circular services available across the Group's optical banners in the EMEA region

Responsible use of resources
- Continuous increase in the consumption of self-produced renewable energy
- Bio-based and recycled materials representing 33% of all sourced materials for frames and lenses
- 157 responsible sourcing audits conducted at supplier sites, +48% from 2024

Societal contribution
- Permanent vision care access to 101 million people
- 7,300+ employee volunteers
- Partnerships with international cultural institutions and museums

Financial community
- External recognitions of ESG performance (e.g., MSCI AAA, CDP A-list) and presence in major ESG indices (e.g. Dow-Jones Best-in-Class Europe, FTSE4Good)

Innovation and technological development are core priorities for EssilorLuxottica and are pursued through a global R&D network focused on four areas: bringing vision to new heights; powering style; making eyewear a gateway into new worlds; and digitizing the industry from the ground up.

In addition, the Company's science-aligned climate targets reinforce its commitment to leading the industry toward a sustainable future. In line with its 2030 Scope 3 emissions reduction target and its open business model, EssilorLuxottica is committed to bringing its suppliers and business partners along on the Group decarbonization journey.

Nevertheless, understanding value-chain vulnerabilities and opportunities allows EssilorLuxottica to implement clear pathways to decarbonization and further integrate sustainability into its business and value creation model. In this respect, integrating double materiality principles into EssilorLuxottica's stakeholder engagement strengthens the alignment between financial and sustainability considerations, enabling the systematic integration of sustainability into decision-making at all levels of the organization.

1.3.2 Interests and Views of Stakeholders

EssilorLuxottica's approach to sustainable development is rooted in understanding the environmental and social impacts of its activities across the value chain. The Company engages a broad range of stakeholders – including employees, suppliers, business partners, eyecare professionals, customers, authorities, and NGOs – at global, regional, and local levels to capture their expectations while ensuring a consistent presence across markets.

The EssilorLuxottica Code of Ethics and Business Partners' Code of Conduct establish principles applicable to all employees, contractors, vendors and suppliers everywhere and in every circumstance. In addition, the Corporate Sustainability Communications Policy provides guidelines for governing and coordinating the Company's external and internal sustainability-related communication flows.

The Group aims to maintain a regular, proactive dialogue with all its stakeholders to respond to their needs and expectations. Stakeholders' interests and views have been considered to build EssilorLuxottica's Eyes on the Planet program, including its approach, policies and targets.

Depending on the situation, interactions between EssilorLuxottica and its stakeholders serve a range of purposes including to:

- support people development via training and engagement between managers and employees thanks to continuous feedback processes and performance review; moreover, employees can express their concerns via the dedicated internal reporting system SpeakUp;
- provide a consultation process for the purpose of anticipating business developments, the market and regulations, as well as managing risks and identifying opportunities;
- involve stakeholders in strategic decisions through customer satisfaction surveys, forums, training sessions, etc.;
- inform stakeholders by providing reliable, factual data using different communication methods, including brochures, websites, annual reviews and questionnaires;
- contribute to growth via partnership projects, particularly in the fields of health and the environment, such as support for patient associations, humanitarian aid programs and partnerships with universities.

Relations and transparent communication with stakeholders are therefore key for the Company, as their needs and viewpoints fuel its strategy and operations. In addition, EssilorLuxottica communicates on its sustainability initiatives and provides regular updates throughout the year on its corporate channels, including its corporate website, social media accounts and Leonardo learning platform. The Group also discloses sustainability information to reporting platforms, such as CDP, S&P Global CSA and EcoVadis Sustainability assessment.

Key stakeholders

The dialogue conducted by EssilorLuxottica with its stakeholders has grown in importance over time. In 2024, they were involved in the Group's first Double Materiality Assessment and in other initiatives, summarized below:

Stakeholder group	Interests and views	Examples of dialogue and engagement methods	2025 highlights
Employees, representative organizations and trade unions	• Quality of working conditions • Work-life balance • Talent recruitment, attraction and retention • Development and training • Equal opportunities, diversity and inclusion	• Annual engagement survey (Your Voice) • SpeakUp (global reporting system) • Open-Door approach • Internal policies and newsletters • Factory Committees • European Works Council • Employee Shareholders' Association	• In 2025, 80% of the employees invited took part in the "Your Voice" engagement survey • 4.2 million hours of education delivered through Leonardo, +24% from 2024 • Internal global mapping of welfare and well-being initiatives in 12 countries
Workers in the value chain	• Quality of working conditions • Work-life balance • Talent recruitment, attraction and retention • Development and training • Equal opportunities, diversity and inclusion	• SpeakUp (global reporting system) • Business Partners' Code of Conduct • EssilorLuxottica Responsible Sourcing and Manufacturing program (ELRSM)	• EssilorLuxottica Responsible Sourcing and Manufacturing audits • Released a SpeakUp e-learning module on Leonardo with practical guidance
Business partners (including licensors) and suppliers	• Responsible sourcing • Collaboration on innovation and development • Integrity and compliance with regulations and laws, including Human Rights	• SpeakUp (global reporting system) • Business Partners' Code of Conduct • EssilorLuxottica Responsible Sourcing and Manufacturing program (ELRSM) • Conversations on product and packaging eco-design and certifications	• Self-assessment questionnaires and 157 on-site audits in 2025 • Expanded access to Leonardo, EssilorLuxottica's digital learning platform • Access to SpeakUp
Clients (e.g., Eye Care Professionnals) and consumers	• High-quality and innovative products • High-quality customer service and training • Responsible marketing • Integrity in business relations • Sustainable offering • Meeting health needs related to societal trends (e.g., digitalization and aging population) • Data protection	• SpeakUp (global reporting system) • Business Partners' Code of Conduct • Customer satisfaction surveys • In-store and social media campaign • Newsletters	• Exploring sustainable packaging solutions, and sustainability certifications, e.g., Global Recycled Standard Certification (GRS) at Fedon and Cradle to Cradle Certification for DbyD brand • Extended product offerings with bio and recycled acetate for frames and bio-nylon for lenses • Awareness campaigns for parents on children's visual health

Stakeholder group	Interests and views	Examples of dialogue and engagement methods	2025 highlights
Shareholders, investors and rating agencies	• Management of sustainable development and ESG risks • Transparency and evaluation of sustainability disclosure • Progress in sustainability strategy and Eyes on the Planet program, including ESG KPIs, commitments and updates	• Regular meetings with investors and analysts • Participation in ESG rating assessments • Annual General Meeting • Workshops	• Annual General Meeting: update on EssilorLuxottica's Eyes on the Planet program, including climate change • Investors' meetings • Regular contact with ESG rating agencies, including MSCI, S&P Global, Sustainalytics, CDP and EcoVadis
Public authorities and governments, NGOs and consumer associations	• Social and economic impact • Transparency (on social initiatives, environmental footprint, product performance, etc.) • Sponsorships and philanthropy • Contribution to visual health and inclusive economy • Fair business practices, including responsible marketing • Dialogue, partnership and education	• Local, regional and national partnerships • Patronage activities	• Partner of Fair Wage Network • Member of Better Cotton through Oakley • Partner of WHO through the OneSight EssilorLuxottica Foundation • Public presentation of a five-year clinical follow-up study of Essilor Stellest lenses in slowing down myopia progression in children • Participation in public consultations and think-tanks on sustainability
Educational institutions	• Cooperation for R&D and innovation (e.g., scholarships and partnerships) • Talent attraction, recruitment and development	• Partnerships • Scholarships • University visits	• Financing EssilorLuxottica Smart Eyewear Lab in Milan, a research platform between EssilorLuxottica and Politecnico di Milano, employing >100 researchers • Supporting OD/PhD Program of the American Academy of Optometry Foundation (AAOF)
Local communities	• Employment creation and support for inclusive businesses and local economies • Raising awareness and providing access to vision correction and protection • Sponsorships and philanthropy	• Capacity-building activities • Awareness campaigns • Employee volunteering • Subsidized services	• OneSight EssilorLuxottica Foundation and its initiatives aimed at eliminating uncorrected poor vision in a generation • In 2025, over 7,300 employees volunteered for the OneSight EssilorLuxottica Foundation • Eyes on Art, enhancing cultural accessibility in 2025 through new partnerships in Italy and France • In 2025, a total of 53,019 meals were delivered, for a daily average of 184 meals.

1.4 Impact, Risk and Opportunity Management

1.4.1 Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment

1.4.1.1 Introduction

Under the European Sustainability Reporting Standards (ESRS), companies within the scope of the Corporate Sustainability Reporting Directive (CSRD) are requested to report on sustainability matters based on a Double Materiality Assessment (DMA). This approach expands materiality beyond financial considerations to include a company's impact on stakeholders and society. The assessment covers two dimensions:

- "inside-out" view (or impact perspective), i.e., if the ESG topic relates to the Company's actual or potential material impacts on people or the environment; and
- "outside-in" view (or financial perspective), i.e., if the ESG topic triggers or may trigger material financial effects on the Company's development, including cash flows, financial position and financial performance.

A topic is considered material if it meets either perspective or both. EssilorLuxottica has implemented a process to assess double materiality, identifying how its business operations impact the environment and society across the value chain, while considering how external factors impact the Company's development, performance and financial position. The identification and disclosure of material positive and negative impacts, and related financial risks and opportunities (IROs) form the basis of ESRS-compliant sustainability reporting.

EssilorLuxottica conducted its double materiality assessment between March and November 2024, with a final validation from the Group's senior management and approval from the Board of Directors after the formal review of the Audit and Risk Committee. This assessment was jointly conducted by the Corporate Sustainability, Finance and Risk Management Departments involving different Group functions. The Group followed the four-step approach suggested in "EFRAG IG 1: Materiality Assessment Implementation Guidance" to identify its material sustainability topics:

1. Context analysis and identification of potential ESG topics;
2. Identification of actual and potential material impacts, risks and opportunities;
3. Assessment and determination of the material impacts, risks and opportunities related to sustainability matters;
4. Validation of the final list of material matters and reporting.

1.4.1.2 Context analysis and identification of potential ESG topics

The first step in the double materiality assessment concerned understanding the context in which EssilorLuxottica operates, considering its global presence and the way it conducts its business. The scoping of the assessment included an identification of EssilorLuxottica's main activities, strategy, the activities characterizing its vertically integrated business model and key stakeholder groups. The approach drew from several sources and incorporated an analysis relative to:

- the Group's key activities, delineated in terms of production processes, distribution channels and geographical locations;
- the value chain, both upstream and downstream, in terms of involved business actors and the nature of their activities;
- identification of key stakeholders' groups both within the Company and across the value chain and determining at which stage of the materiality assessment process their engagement would be most appropriate.

Building on the ten topics provided by the ESRS, a multi-level analysis was conducted to ensure that all material topics were properly included in the assessment. The main steps entailed:

- an analysis of EssilorLuxottica's sustainability strategy, focusing on the Company's sustainability program, identified ESG risks and strategic objectives;
- a benchmark analysis useful for identifying key ESG topics considered material among a defined panel of industry players;
- value chain analysis to identify topics that may impact key actors, which could otherwise remain undetected;
- analysis of additional topics through international frameworks such as the Global Reporting Initiative (GRI), Sustainability Accounting Standards Board (SASB), United Nations Principles for Responsible Investment (UN PRI) and Sustainable Development Goals (SDGs).

The outcome of this analysis consisted of a list of 81 potentially material ESG matters (including all sub-topics included in ESRS), categorized into Environmental, Social, Governance and Cross-topic dimensions before considering any mitigation measures.

Through an online survey, a panel of 47 internal stakeholders were asked to identify, from this list, the matters they thought would not be material for EssilorLuxottica's business and additional specific topics which have not been identified yet. Then, through an internal workshop, organized with 10 internal stakeholders belonging to the Group's functions of Corporate Sustainability, Risk Management and Finance, the final list of potentially material ESG matters was validated and those matters were clustered into 25 "macro" ESG matters.

This shortlist of potential ESG matters was conceived as the starting point for the subsequent impacts, risks and opportunities identification and their assessment.

1.4.1.3 Identification of potential material impacts, risks and opportunities

Following the context analysis, impacts, risks and opportunities connected with the sustainability matters across the Group's own operations and value chain were identified while considering short-, medium-, and long-term perspectives. The analysis included:

- extensive desk research on emerging industry and market trends and evidence;
- benchmarking analysis of sustainability reports from 16 peers in the healthcare, fashion and retail industries;
- analysis and mapping of the ESG risks identified within the ERM (Enterprise Risk Management) process during the previous reporting period (2023);
- consultation with key internal stakeholders of the main functions, such as Corporate Sustainability, Risk Management and Finance;
- specific focusing such as dependencies on biodiversity and ecosystems, sensitive sites and potential value chain impacts.

Through stakeholder consultation and additional inputs, all material current and potential IROs were derived for the 25 ESG matters. This comprehensive process yielded a list of 87 potential material IROs.

1.4.1.4 Assessment and identification of material impacts, risks and opportunities

To determine the final material IROs, a comprehensive stakeholder engagement plan was developed by selecting key internal and external stakeholders to be consulted via direct methods (e.g., interviews, workshops and surveys) and indirect methods (e.g., external desk research) allowing the Company to take into consideration how the affected stakeholders may be impacted without taking into consideration the existing mitigation measures. EssilorLuxottica relied on inputs from sustainability, risk and subject matter experts related to several group functions for climate, environment, social, HSE, diversity, equity and inclusion, product safety and innovation, circularity, data privacy and governance matters. External stakeholders such as non-governmental organizations, suppliers, business partners, financial analysts, customer representatives, doctors and sector associations, foundations and experts from academia to actively account for different perspectives about EssilorLuxottica's sustainability performance have been included.

Internal stakeholders were asked to evaluate:

- the impact materiality on scale, scope, irremediable character of impact[1] and likelihood; and
- the financial materiality (on likelihood and economic, operational and reputation aspects) of the potential material risks and opportunities of the ESG topics perceived as more material for them in relation to EssilorLuxottica's business, based on their specific expertise and judgment.

External stakeholders, on the other hand, were asked to assess the positive and negative impacts on likelihood and severity (this grouping together the scale, scope and irremediability) for each IRO. To determine the materiality of the impacts, the three mentioned criteria refer to:

- scale: how severe are the (potential) negative and positive impacts;
- scope: how broad are the (potential) negative and positive impacts;
- irremediable character of the impact: how difficult it is to reverse or compensate for the damage caused.

Both internal and external stakeholders scored the IROs through detailed evaluation scales comprehensively explained via an online survey and had the opportunity to comment on the matters via open text fields. For the potential impacts, the additional parameter of likelihood was scored. More specifically, the evaluation scales were developed on a range [one to five], in alignment with the existing ERM scale in place, already adopted in previous years' risk assessments. Additionally, key internal stakeholders participated in in-depth interviews to further explore the rationale behind the relevance of sustainability matters, based on their area of expertise. The online survey was sent to 115 internal stakeholders and 128 external stakeholders, with a total of 134 responses received: 89 from internal stakeholders and 45 from external stakeholders (i.e., response rates of 78% and 35% respectively).

Internal interviews and workshops included 18 one-to-one interviews and five workshops, each focusing on different topics, based on the specific expertise and background of the single interviewee. Altogether, they covered all sustainability IROs. The interviews and workshops were conducted according to an established and standardized approach. Each interviewee, depending on the specific area of expertise, was asked to give an explanation on the evaluations provided through the survey, to better understand the rationale, potential changes to their evaluation, and insights on the trend of the specific IROs along the short and long term (increase, stable or decrease) and where these IROs might materialize along the value chain (upstream, downstream and own operations).

(1) *Irremediability applies only to negative impacts.*

Specific weights have been assigned to the different stakeholders, depending on their area of expertise in the interviews. Specifically, a weight of 65% was allocated to the evaluation of the underlying IROs related to the ESG topics discussed by the interviewee, and a weight of 35% was allocated to the assessment of the remaining IROs and to all evaluations made by stakeholders who only completed the survey.

In terms of results consolidation, and to derive a prioritization of the final ESG matters, the underlying methodology entailed the selection of the highest impact (severity and likelihood) and financial scores (magnitude and likelihood) received by its related IROs, and then converted again on a scale of one to five. In case of a potential negative Human Rights impact, severity has been given precedence over likelihood through the application of a multiplier.

Finally, the threshold to determine the materiality of the rated impacts, risks and opportunities has been set to grant synergy with the one implied in the risk assessment process, thus reflecting a moderate and significant impact from both perspectives. With regard to time horizons, the time intervals considered in the double materiality assessment are up to one year for the short term, one to five years for the medium term and more than five years for the long-term time horizon.

Besides, it should be noted that to complement the double materiality assessment and give voice to an increasingly important stakeholder, nature, EssilorLuxottica has further included in the analysis the impacts it could have by relying on the data provided by the WWF Risk Filter on biodiversity. This consists of a further step made by the Group in the direction of narrowing the gap between what is perceived to be material from the Company's perspective and what is material from an environmental perspective such as, for instance, planetary boundaries.

1.4.1.5 Validation of final list of material IROs

EssilorLuxottica finalized its Double Materiality Assessment through two workshops with senior management to review the process, validate results and confirm or adjust the materiality of sustainability Impacts, Risks and Opportunities (IROs). Outcomes from interviews and workshops, combined with quantitative survey results, formed the basis for consolidation.

The workshops aimed to share the methodology, discuss DMA results, incorporate feedback and prepare the organization for the next sustainability reporting steps. In some cases, senior management recommended classifying certain impacts, risks or opportunities as material despite initial survey results, and these adjustments were carefully considered based on strong supporting arguments. The consolidated analysis was subsequently presented to the Audit & Risk Committee and the CSR Committee.

The Corporate Sustainability department refined the formulation of IROs to align with the 2024 Group's risk assessment and reflected its constant interaction with other functions, regulatory clarifications and market practices. The final list includes 41 material IROs: five positive impacts, 15 negative impacts, 15 risks and six opportunities.

1.4.1.6 Update framework and annual review

The double materiality assessment will be comprehensively updated at least every four years. This full update will involve a new cycle of stakeholder consultations, a refresh of IROs and revised scoring. In the interim, EssilorLuxottica will annually evaluate whether additional updates are required, in line with EFRAG criteria. Among these criteria, significant changes in scope or activities, such as major acquisitions or expansion into new markets, may trigger an interim update. Accordingly, in 2025, alongside the Group-wide Enterprise Risk Assessment, a light review of the DMA was conducted following several specific analyses. As a result, the impact "Use of water resources that might impact local communities and the environment" was expanded to include the upstream value chain, and its description was further refined (see the presentation of material IROs below).

1.4.1.7 Double materiality assessment outcome

Table 1 below outlines the material impacts, risks and opportunities from EssilorLuxottica's Double Materiality Assessment. This table includes an analysis of each item's relevance over different time horizons and across various stages of the value chain.

			Upstream	Own operations	Downstream
ESRS Topics	Material topics	IRO	Sourcing raw materials	Research & Innovation Production Design and Marketing	Distribution Product use and end-of-life
E1 Climate Change	Climate Resilience	I–, R	●	●	●
	Climate Transition	R, I–	●	●	●
E2 Pollution	Pollution Prevention	R		●	
	Product Safety	I–	●	●	●
E3 Water and Marine Resources	Water Management	R, I–	●	●	
E5 Circular Economy	Circular Sources, Products and Services	I–, O, R	●	●	●
	Waste Management	R, I–	●	●	●
S1 Own Workforce	Employee Engagement and Well-being	R, I–, O, I+		●	
	Social Dialogue and Freedom of Association	I–		●	
	Health & Safety	I–		●	
	Talent Management and Development	I+		●	
	Diversity, Equity and Inclusion	O		●	
	Human and Social Rights of Own Workforce	I–		●	
S2 Workers in the Value Chain	Working Conditions and Human Rights in the Value Chain & Equal Treatment and Opportunities for All	I–, R	●	●	●
S3 Affected Communities	Creating Awareness of Vision Care for All	O			●
	Affected Communities' Rights and Engagement	I+			●
	Impactful Programs that give Vision Care Access to All	I+		●	
S4 Consumers and End-users	Data Privacy	I–, R			●
	Product Innovation	O			●
	Creating Awareness of Vision Care for All	I+			●
	Product Safety	I–, R			●
	Relationship with Consumers	O			●
	Transparent Communication and Reporting	R			●
G1 Business Conduct	Business Ethics and Integrity	I–, R	●	●	●
	Responsible Sourcing Practices	I–, R	●	●	●
	Corruption and Bribery	R, I–	●	●	●

I+ Positive impact I– Negative impact R Risk O Opportunity

Material topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon	Link with Group's risk factors
E1 Climate Change							
Climate Resilience	Adverse social impacts due to the disruption in operations caused by extreme climate events	Extreme climate events such as hurricanes, floods or droughts can ultimately lead to significant social impacts including job losses and reduced working hours, economic strain on affected communities, social unrest or dissatisfaction due to prolonged service outages or production delays.	Negative impact	Value chain	Actual	Short	
	Disruption of activities due to extreme climate events (e.g., hurricane, floods, etc.)	Increase in extreme weather events (e.g., cyclones, droughts, floods, etc.) due to climate change, impact on business continuity in terms of operational disruptions, supply chain interruptions and store closures causing capacity to be downgraded and operations to be temporarily stopped or shut down completely.	Risk	Value chain	Actual	Short	Climate Transition
Climate Transition	Risks associated with transitioning to a lower-carbon economy (policy, legal, technology and market changes)	Transitioning to a lower-carbon economy could imply the issuance of country-specific carbon regulatory policies or carbon taxes or stricter environmental regulations. Compliance with these regulations would involve the adoption of new, low-carbon technologies, which may require significant investment, pose operational challenges and increase production costs (e.g., raw materials, energy and transportation). At the same time, consumer demand for responsible products and services may lead to adjustments in product design and manufacturing and retail services.	Risk	Value chain	Potential	Long	Climate Transition/ Laws, Regulations and Certifications
	Energy consumption and GHG emissions	The threats of high energy consumption and GHG emissions to climate change may translate into more extreme weather events, rising sea levels and disruptions to ecosystems, thereby impacting biodiversity and natural resources, as well as the broader environment and society.	Negative impact	Value chain	Actual	Short	

Material topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon	Link with Group's risk factors
E2 Pollution							
Pollution Prevention	Risk of infringements of pollution-related regulations and of costs due to remediation actions	Failing to reduce the environmental impacts of air or water pollution from the manufacturing sites and lens laboratories could lead to non-compliance with pollution prevention regulations, resulting in penalties, fines, increased operational costs and legal liabilities. Additionally, regulatory violations could damage the Company's reputation, leading to loss of consumer trust, investor confidence and market competitiveness.	Risk	Own opera-tions	Potential	Medium	Laws, Regulations and Certifications
Product Safety	Potential impact on human health and the environment	Potential exposure to substances of concern and microplastics could threaten health, causing allergic reactions, toxicity or long-term health issues. Additionally, the release of microplastics and harmful chemicals into the environment during the production process, use or disposal of products can lead to water contamination and contribute to broader environmental degradation.	Negative impact	Value chain	Potential	Long	
E3 Water and Marine Resources							
Water Management	Risk of inefficient water management practices	Excessive water use and withdrawals, uncontrolled discharges or leaks of waste-water can disrupt supply chains, particularly for water-dependent processes leading to higher operational costs, production delays, potential water pollution and regulatory fines.	Risk	Own opera-tions	Potential	Medium	Supply Chain
	Use of water resources that might impact local communities and the environment	Negative environmental impacts (e.g., depletion or degradation of water resources and ecosystem services) and effects on local communities due to inadequate withdrawal, consumption and discharges – particularly in water-stressed areas – occurring both in our own operations and in the upstream value chain.	Negative impact	Up-stream and Own opera-tions	Actual	Short	
E5 Circular Economy							
Circular Sources, Products and Services	Use of raw material and natural resources	Excessive extraction and inefficient use of key resources (such as fossil-based materials, metal) can lead to the depletion of finite natural reserves, contributing to environmental degradation.	Negative impact	Value chain	Actual	Short	

Material topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon	Link with Group's risk factors
Circular Sources, Products and Services (continued)	Developing alternative materials (to the benefit of the entire industry)	Embracing advanced technologies (e.g., alternative materials, reuse, increasing renewable and recycled content) to reduce reliance on traditional, finite resources can support the Company's positioning as a leader in sustainable innovation. This shift allows the Company to explore and adopt new, eco-friendly materials that minimize environmental impact, increase production efficiencies and savings and align with evolving consumer demand for more sustainable products, ultimately affecting the broader industry, as these innovations can set new standards for sustainability and resource efficiency.	Opportunity	Own operations	Actual	Short	
	Risk of limited access to certain raw materials (scarcity, stringent regulations)	Growing global demand for key resources has heightened scarcity, driving up costs and complicating procurement processes. Additionally, evolving environmental regulations aimed at protecting natural ecosystems impose stricter requirements, limiting access to raw materials and increasing compliance costs. These challenges can lead to production delays, rising operational expenses and diminished competitiveness.	Risk	Value chain	Potential	Long	Supply Chain
	Risk of not answering product and service sustainability expectations	Failure to meet sustainability expectations, which entails reducing resource outflows by designing products for longevity, recyclability and reusability, can lead to increased reputational damage, as consumers increasingly prefer environmentally responsible products, leading to loss of market share and reduced revenue.	Risk	Own operations	Potential	Medium	Product Quality & Circularity
Waste Management	Risk of lack of compliance with waste regulation	Improper management of waste poses risks for organizations, including increased costs and reputational damage. Non-compliance with environmental regulations can lead to fines and penalties.	Risk	Own operations	Potential	Medium	Laws, Regulations and Certifications
	Waste generation	Damage related to environmental degradation (environmental pollution and reduction of ecosystem services) due to improper waste management (e.g., dispersal or abandonment of waste).	Negative impact	Value chain	Actual	Short	

Material topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon	Link with Group's risk factors
S1 Own Workforce							
Employee Engagement and Well-being	Risk of lack of attractiveness and retention of employees	When failing to create an appealing work environment, companies can experience high turnover rates, leading to significant costs related to recruiting, hiring and training new staff. Frequent turnover can result in a loss of institutional knowledge and experience, which hinders productivity and disrupts team dynamics. Additionally, inadequate benefits, limited growth opportunities and a negative workplace culture can lead to decreased employee morale and engagement, causing disengaged employees to perform at lower levels.	Risk	Own operations	Potential	Medium	People Management
	Risk of non-compliance with working hours regulations	Non-compliance with working hours regulations poses risks for both employees and organizations. Legal penalties, including fines and lawsuits from employees, can arise from failing to adhere to labor laws, resulting in costly financial repercussions. Additionally, excessive workloads and prolonged hours can lead to employee burnout, stress and a decline in overall health, ultimately increasing absenteeism and reducing productivity.	Risk	Own operations	Potential	Medium	People Management
	Potential inadequate wage practices	Potential inadequate wage practices can have several negative impacts on employees. If wages do not reflect the cost of living, employees may experience financial stress, which can lead to decreased morale and job satisfaction.	Negative impact	Own operations	Potential	Long	
	Granting employees benefits	Granting employees benefits that promote work-life balance presents significant opportunities for both the workforce and the organization. By providing flexible work hours, remote work options and additional paid time off, organizations can significantly enhance job satisfaction, which in turn translates to increased productivity, as employees experience reduced stress and burnout, leading to a more focused and motivated workforce.	Opportunity	Own operations	Actual	Short	

Material topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon	Link with Group's risk factors
Social Dialogue and Freedom of Association	Potential lack of social dialogue measures	Inadequate freedom of association prevents employees from forming or joining unions, limiting their ability to advocate for their rights and interests. This results in a sense of isolation and disempowerment among workers. Additionally, the absence of works councils and insufficient information, consultation and participation rights means employees are often excluded from decision-making processes that affect their working conditions, leading to them feeling undervalued. Furthermore, ineffective collective bargaining can leave many workers unprotected by collective agreements, resulting in unequal treatment regarding wages, benefits and working conditions.	Negative impact	Own operations	Potential	Long	
Health & Safety	Potential exposure to various workplace hazards	Inadequate Health & Safety measures can have a negative impact on the workforce, primarily through the lack of proper personal protective equipment (PPE) and maintenance of tools and equipment, leading to increase in the number of workplace injuries. When workers do not feel safe and protected, it fosters a negative workplace environment, which can impact morale and overall job satisfaction.	Negative impact	Own operations	Actual	Short	
Talent Management and Development	Employees' personal and professional growth	Investing in employees' personal and professional growth through training and skills development positively impacts the workforce by enhancing expertise, improving job satisfaction, and increasing overall team effectiveness. Continuous learning opportunities empower employees to adapt to industry changes, take on new challenges, and advance their careers.	Positive impact	Own operations	Actual	Short	
Diversity, Equity and Inclusion Employee Engagement and Well-being	Efficiencies related to promoting a diverse and inclusive environment	Promoting a diverse and inclusive environment creates opportunities for increased efficiency and growth. Ensuring gender equality and equal pay, as well as employment and inclusion of persons with disabilities, expands the talent pool, fosters innovation and enhances employee satisfaction. Prioritizing diversity helps the organization better connect with global markets, while measures against violence and harassment ensure a safer workplace, boosting engagement and reducing risks. Overall, these practices lead to higher productivity, better decision-making and stronger financial performance.	Opportunity	Own operations	Actual	Short	

Material topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon	Link with Group's risk factors
Human and Social Rights of Own Workforce	Potential inadequate Human Rights practices	Inadequate Human Rights practices or lack of processes and mechanisms to monitor compliance with the Company's Code of Ethics and Human Rights regulations and principles can damage the Company's reputation as an employer (making it difficult to attract and retain skilled talent) and as a trustworthy business partner for both suppliers and clients.	Negative impact	Own operations	Potential	Long	
Employee Engagement and Well-being	Reinforcing of employees' sense of commitment and engagement through employee shareholding	Employee shareholding programs strengthen commitment and engagement by aligning employees' interests with the Company's performance. This approach fosters a sense of ownership and responsibility, leading to increased motivation, productivity and loyalty. As shareholders, employees are more invested in the Company's success, driving their active participation in its growth and sustainability.	Positive impact	Own operations	Actual	Short	
S2 Workers in the Value Chain							
Working Conditions and Human Rights in the Value Chain & Equal Treatment and Opportunities for All	Inappropriate working conditions, unequal treatment and Human Rights practices for business partners' employees	Inappropriate working conditions, unequal treatment or lack of Human Rights practices for business partners' employees including inadequate safety measures, excessive working hours and insufficient wages jeopardize the health and well-being of workers.	Negative impact	Upstream	Actual	Short	
	Collaborating with business partners not aligned with EssilorLuxottica's ethical principles and standards	Potential lack of alignment or failure to comply with the Group's ethical principles and standards regarding fair working conditions and Human Rights could damage the Company's reputation, success and achievement of sustainability commitments, and create legal liabilities for the Group. Stakeholders, including consumers, employees, shareholders and business partners, increasingly demand transparency and accountability in supply chains; any association with partners engaging in unethical practices can lead to public backlash, diminished brand loyalty and a loss of consumer trust, while exposing the Group to legal risks and regulatory scrutiny.	Risk	Value chain	Actual	Short	Business Partners/Laws, Regulations and Certifications

Material topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon	Link with Group's risk factors
S3 Affected Communities							
Creating Awareness of Vision Care for All	Creating access to eyewear and eyecare solutions for disadvantaged communities[a]	Creating access to eyewear and eyecare solutions for disadvantaged communities by tackling uncorrected poor vision in underserved populations, offers a dual advantage: improving quality of life (enhanced education, socio-economic development and public health) and offering market opportunities (new segments and new products, etc.).	Oppor-tunity	Down-stream	Actual	Short	
Affected Communities' Right and Engagement	Impact on local communities' development thanks to eyewear and eyecare programs[a]	Eyecare and eyewear programs enhance the overall quality of life, particularly in underserved and vulnerable populations. Good vision directly contributes to better educational outcomes for students and increased productivity for workers, fostering economic growth at local level. Additionally, these initiatives often create job opportunities within the communities, both in the delivery of eyecare services and the distribution of eyewear products.	Positive impact	Down-stream	Actual	Short	
Impactful Programs that give Vision Care Access to All	Volunteering activities and social initiatives[a]	Engagement activities and employee volunteering activities through OneSight Foundation contribute to the improvement of economic and social conditions of underserved communities at a local level, as well as enhancing employees' sense of contribution and engagement through their involvement in volunteering activities.	Positive impact	Own opera-tions	Actual	Short	

(a) Entity-specific.

Material topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon	Link with Group's risk factors
S4 Consumers and End-users							
Data Privacy	Consumers' personal data breaches	Data breaches resulting from inefficient data privacy measures expose consumers and stakeholders' personal data to unauthorized third parties causing anxiety and distress for the affected persons and distrust in the Company due to the loss of control over their personal data.	Negative impact	Down-stream	Actual	Short	
	Infringements of data privacy-related regulations	Infringements of data privacy-related regulations pose reputation and legal risks for organizations and individuals. Non-compliance with laws such as the General Data Protection Regulation (GDPR) or similar data privacy frameworks can result in severe financial penalties, legal liabilities and potential litigations. Beyond financial repercussions, violations of data privacy can erode trust with consumers, damaging a company's reputation and leading to a loss of consumer loyalty.	Risk	Down-stream	Actual	Short	Data Privacy
Product Innovation	Innovating to respond to current and new consumer demand	By developing new products and enhancing existing ones to align with consumers' preferences – whether through sustainability, functionality or design – businesses can strengthen consumer loyalty, attract new market segments and differentiate themselves in a competitive landscape. As new and improved products are introduced, demand increases, leading to higher sales volumes and new growth opportunities for partners.	Oppor-tunity	Down-stream	Actual	Short	
Creating Awareness of Vision Care for All	Granting of eyewear and eyecare access	Granting access to eyewear and eyecare promotes social inclusion by enabling individuals to fully participate in education, work and daily life. Improved vision boosts learning outcomes, enhances job productivity and fosters independence, reducing inequalities linked to uncorrected poor vision.	Positive impact	Down-stream	Actual	Short	

Material topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon	Link with Group's risk factors
Product Safety	Potential Health & Safety issues for consumers due to use of the products	Product defects, inadequate safety standards and harmful materials can affect consumers, leading to injuries and health issues. This exposure can lead to health concerns, including eye strain and skin damage. Furthermore, harmful materials can trigger allergic reactions, compromising comfort and well-being.	Negative impact	Down-stream	Potential	Medium	
	Risk of litigation and reputational damage due to product quality and safety issues	Incidents related to product quality and safety assurance may lead to claims for compensation from consumers and fines from authorities, as well as negatively impacting brand reputation, resulting in financial losses.	Risk	Down-stream	Potential	Long	Product Quality & Circularity/ Litigation and proceedings Arbitration
Relationship with Consumers	Enhanced consumer loyalty	Consumers' access to quality information disclosed by the Group may enhance their trust and loyalty, positively impacting brand perception and leading to higher financial returns.	Oppor-tunity	Down-stream	Actual	Short	
Transparent Communi-cation and Reporting	Risk of non-compliance with upcoming greenwashing regulations	As governments and authorities are narrowing the attention on greenwashing, non-compliance with emerging sustainability and transparency regulations could have negative repercussions on the business, in terms of legal fines and negative financial returns, due to reduction of consumer trust and the Company's lower credibility.	Risk	Down-stream	Potential	Medium	Laws, Regulations and Certifications

Material topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon	Link with Group's risk factors
G1 Business conduct							
Business Ethics and Integrity Responsible Sourcing Practices	Possible decrease of trust from business partners and employees	Engagement in unethical business practices, violations of whistleblower protection and unfair treatment of suppliers could significantly erode trust among business partners and employees. The lack of commitment to ethical standards may lead to skepticism among business partners, who may question the Company's reliability and commitment to sustainability.	Negative impact	Value chain	Potential	Long	
Business Ethics and Integrity Responsible Sourcing Practices	Risk of unethical business practices	Engagement in unethical business practices, violation of whistleblower protection or unfair behavior with suppliers may expose the Company and its value chain to legal fines, reputational damage and financial harm, as well as undermine the Company's long-term sustainability and market position.	Risk	Value chain	Potential	Long	Laws, Regulations and Certifications
Corruption and Bribery	Risk of ineffective policies related to anti-bribery and corruption	Ineffective Company policies and procedures to prevent bribery and corruption may lead to legal penalties, reputational damage and financial losses, if the Group, its employees or its key actors in the value chain are involved in unethical practices, or fail to comply with local and international regulations on anti-corruption. Moreover, ineffective policies could also undermine stakeholder trust and damage long-term business sustainability.	Risk	Value chain	Potential	Long	Litigations and proceedings arbitration
	Potential unfair advantage over competitors	Gaining a competitive edge through unfair means, such as bribing officials or manipulating business practices, could distort market competition, negatively impacting competitors along the entire value chain who operate ethically, in terms of business opportunities and financial returns.	Negative impact	Value chain	Potential	Long	

1.4.1.8 Additional information on EssilorLuxottica's double materiality approach

Stakeholder engagement is a crucial component of the double materiality assessment process. By actively involving a diverse range of stakeholders, both internal and external, it is ensured that decisions are well-informed and reflective of the broader community's needs and expectations. Engaging with stakeholders helped to identify key impacts, risks and opportunities that might not be apparent through internal analysis alone.

Below are summary tables (Table 2 and Table 3) listing the categories of stakeholders that have been engaged:

Table 2

Internal stakeholder functions
Board of Directors
Corporate Sustainability
Human Resources
Operations
Risk Management
Communication
Investor Relations
Finance
Compliance
Legal
EHS
Internal Audit
M&A and Corporate Development
Marketing & Sales
Supply Chain
R&D
IT
Product Development and Quality
Procurement
Mission
Retail

Table 3

External stakeholder functions
Academia
Clients/Customers
Doctors
Investors
Rating Agencies
Licensors
Media
Suppliers
NGOs
Research Institutions
Business Partners
Nature

1.4.2 Disclosure Requirements in ESRS Covered by EssilorLuxottica's Sustainability Statement

Appendix B

Disclosure requirement and related datapoint	Section and page number	Materiality
ESRS 2 GOV-1 Board's gender diversity, paragraph 21 (d)	1.2.1 *The Role of the Administrative, Management and Supervisory Bodies* p. 5	
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)	1.2.1 *The Role of the Administrative, Management and Supervisory Bodies* p. 5	
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	1.2.4 *Statement on Due Diligence* p. 7	
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40 (d) I	Not relevant for the Group	
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40 (d) II	Not relevant for the Group	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) III	Not relevant for the Group	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40 (d) IV	Not relevant for the Group	
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14	2.1.3 *Transition Plan for Climate Change Mitigation* p. 38	
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks, paragraph 16 (g)	Not relevant for the Group	
ESRS E1-4 GHG emissions reduction targets, paragraph 34	2.1.6 *Targets* p. 43	
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	2.1.7 *Energy Consumption and Mix* p. 45	
ESRS E1-5 Energy consumption and mix, paragraph 37	2.1.7 *Energy Consumption and Mix* p. 45	
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	2.1.7 *Energy Consumption and Mix* p. 46	
ESRS E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions, paragraph 44	2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)* p. 46	
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)* p. 48	
ESRS E1-7 GHG removals and carbon credits, paragraph 56	2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)* p. 48	

Disclosure requirement and related datapoint	Section and page number	Materiality
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66	Phased-in	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a)	Phased-in	
ESRS E1-9 Location of significant assets at material physical risk, paragraph 66 (c).	Phased-in	
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c).	Phased-in	
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities, paragraph 69	Phased-in	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	2.2.5 *Targets and Metrics* p. 51	
ESRS E3-1 Water and marine resources, paragraph 9	2.3.3 *Policies* p. 52	
ESRS E3-1 Dedicated policy, paragraph 13	Not relevant for the Group	
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Not relevant for the Group	
ESRS E3-4 Total water recycled and reused, paragraph 28 (c)	2.3.5 *Targets and Metrics* p. 54	
ESRS E3-4 Total water consumption in m^3 per net revenue on own operations, paragraph 29	2.3.5 *Targets and Metrics* p. 54	
ESRS 2- SBM 3 – E4, paragraph 16 (a) i	-	Not material
ESRS 2- SBM 3 – E4, paragraph 16 (b)	-	Not material
ESRS 2- SBM 3 – E4, paragraph 16 (c)	-	Not material
ESRS E4-2 Sustainable land/agriculture practices or policies, paragraph 24 (b)	-	Not material
ESRS E4-2 Sustainable oceans/seas practices or policies, paragraph 24 (c)	-	Not material
ESRS E4-2 Policies to address deforestation, paragraph 24 (d)	-	Not material
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	2.4.6 *Targets and Metrics* p. 63	
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	2.4.6 *Targets and Metrics* p. 63	

Disclosure requirement and related datapoint	Section and page number	Materiality
ESRS 2- SBM3 – S1 Risk of incidents of forced labour, paragraph 14 (f)	3.1.7.3 *Policies* p. 100	
ESRS 2- SBM3 – S1 Risk of incidents of child labour, paragraph 14 (g)	3.1.7.3 *Policies* p. 100	
ESRS S1-1 Human rights policy commitments, paragraph 20	3.1.7.3 *Policies* p. 100	
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, paragraph 21	3.1.7.3 *Policies* p. 100	
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	3.1.7.3 *Policies* p. 100	
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	3.1.3.5 *Preventing and managing Health & Safety risks to people* p. 82 3.1.3.6 *Actions and Resources* p. 83	
ESRS S1-3 Grievance/complaint handling mechanisms, paragraph 32 (c)	3.1.7.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns* p. 101	
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88 (b) and (c)	3.1.3.7 *Targets and Metrics* p. 85	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88 (e)	3.1.3.7 *Targets and Metrics* p. 85	
ESRS S1-16 Unadjusted gender pay gap, paragraph 97 (a)	3.1.2.6 *Actions and Resources* p. 77	
ESRS S1-16 Excessive CEO pay ratio, paragraph 97 (b)	4.3.3 *AFEP-MEDEF Compensation and Benefits Tables* p. 200 of the 2025 Universal Registration Document	
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	3.1.7.7 *Metrics and Targets* p. 103	
ESRS S1-17 Non-respect of UNGPs on business and Human Rights and OECD Guidelines, paragraph 104 (a)	3.1.7.7 *Metrics and Targets* p. 103	
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain, paragraph 11 (b)	3.2.2 *Material Impacts, Risks and Opportunities* p. 104	

Disclosure requirement and related datapoint	Section and page number	Materiality
ESRS S2-1 Human rights policy commitments, paragraph 17	3.2.3 *Policies and Engagement* p. 105	
ESRS S2-1 Policies related to value chain workers, paragraph 18	3.2.3 *Policies and Engagement* p. 105	
ESRS S2-1 Non-respect of UNGPs on business, Human Rights principles and OECD guidelines, paragraph 19	3.2.3 *Policies and Engagement* p. 107	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, paragraph 19	3.2.3 *Policies and Engagement* p. 105	
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	3.2.4 *Actions and Resources* p. 108	
ESRS S3-1 Human rights policy commitments, paragraph 16		Not material
ESRS S3-1 Non-respect of UNGPs on business and Human Rights, ILO principles or OECD guidelines, paragraph 17		Not material
ESRS S3-4 Human rights issues and incidents, paragraph 36		Not material
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	3.4.2.3 *Policies* p. 115; 3.4.3.3 *Policies* p. 119; 3.4.4.3 *Policies* p. 123	
ESRS S4-1 Non-respect of UNGPs on business and Human Rights and OECD guidelines, paragraph 17	3.4.2.3 *Policies* p. 115; 3.4.3.3 *Policies* p. 119; 3.4.4.3 *Policies* p. 123	
ESRS S4-4 Human Rights issues and incidents, paragraph 35	To the best knowledge of EssilorLuxottica, there were no issues and incidents regarding Human Rights and consumers/end-users	
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Not relevant as the Group has an Anti-bribery and corruption policy	
ESRS G1-1 Protection of whistleblowers, paragraph 10 (d)	Not relevant as EssilorLuxottica is subject to legal requirements with regard to protection of whistleblowers, in accordance with the applicable laws transposing Directive "EU" 2019/1937 and other applicable laws	
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	To the best knowledge of EssilorLuxottica, there were no convictions or fines for violation of anti-corruption and anti-bribery laws in 2025, as stated in Section 4.1.6 *Targets and Metrics* p. 131	
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24 (b)	4.1.5 *Actions, Resources and Procedures* p. 127	

ESRS	Topic	Data requirement	Section and page number
ESRS E2	Pollution	IRO-1	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		E2-1	2.2.3 *Policies* p. 49
		E2-2	2.2.4 *Actions and Resources* p. 49
		E2-3	2.2.5 *Targets and Metrics* p. 51
		E2-4	1.1.1 *General Basis for Preparation of Sustainability Statements* p. 4
		E2-5	1.1.1 *General Basis for Preparation of Sustainability Statements* p. 4
		E2-6	Phase-in
ESRS E3	Water and marine resources	IRO-1	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		E3-1	2.3.3 *Policies* p. 52
		E3-2	2.3.4 *Actions and Resources* p. 52
		E3-3	2.3.5 *Targets and Metrics* p. 54
		E3-4	2.3.5 *Targets and Metrics* p. 54
		E3-5	Phase-in
ESRS E4	Biodiversity and ecosystems	Not material	-
ESRS E5	Circular economy	IRO-1	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		E5-1	2.4.3 *Policies* p. 55
		E5-2	2.4.5 *Actions and Resources* p. 57
		E5-3	2.4.6 *Targets and Metrics* p. 62
		E5-4	2.4.4 *Key Products and Materials* p. 56
		E5-5	2.4.5 *Actions and Resources* p. 57
		E5-6	Phase-in

ESRS	Topic	Data requirement	Section and page number
ESRS S1	Own workforce	SBM-2	1.3.2 *Interests and Views of Stakeholders* p. 10
		SBM-3	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13; 3.2.2 *Material Impacts, Risks and Opportunities* p. 72
		S1-1	3.1.2.3 *Policies* p. 73; 3.1.3.3 *Policies* p. 81; 3.1.4.3 *Policies* p. 86; 3.1.5.3 *Policies* p. 90; 3.1.6.3 *Policies and processes* p. 95; 3.1.7.3 *Policies* p. 100
		S1-2	3.1.2.4 *Processes for engaging with own workers and workers' representatives* p. 74; 3.1.3.4 *Engaging with own workforce on Health & Safety* p. 81; 3.1.4.4 *Processes for engaging with own workforce and workers' representatives* p. 86; 3.1.5.4 *Processes for engaging with own workers and workers' representatives* p. 90; 3.1.6.3 *Policies and processes* p. 95; 3.1.7.4 *Processes for engaging with own workers and workers' representatives* p. 100
		S1-3	3.1.2.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns* p. 75; 3.1.3.5 *Preventing and managing Health & Safety risks to people* p. 82; 3.1.4.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns* p. 87; 3.1.7.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns* p. 101
		S1-4	3.1.2.6 *Actions and Resources* p. 75; 3.1.3.6 *Actions and Resources* p. 82; 3.1.4.6 *Actions and Resources* p. 87 3.1.5.5 *Actions and Resources* p. 90; 3.1.6.4 *Actions and Resources* p. 97; 3.1.7.6 *Actions and Resources* p. 103
		S1-5	3.1.2.7 *Targets and Metrics* p. 80; 3.1.3.7 *Targets and Metrics* p. 84; 3.1.4.7 *Targets and Metrics* p. 87; 3.1.5.6 *Targets and Metrics* p. 94; 3.1.6.5 *Targets and Metrics* p. 98; 3.1.7.7 *Metrics and Targets* p. 103
		S1-6	3.1.1 *Introduction* p. 68
		S1-7	3.1.1 *Introduction* p. 68
		S1-8	3.1.4.7 *Targets and Metrics* p. 88
		S1-9	3.1.6.5 *Targets and Metrics* p. 98
		S1-10	3.1.2.6 *Actions and Resources* p. 78
		S1-11	3.1.4.6 *Actions and Resources* p. 88
		S1-12	3.1.6.4 *Actions and Resources* p. 98
		S1-13	Phase-in
		S1-14	3.1.3.7 *Targets and Metrics* p. 84
		S1-15	3.1.2.6 *Actions and Resources* p.76
		S1-16	3.1.2.6 *Actions and Resources* p. 77
		S1-17	3.1.3.7 *Targets and Metrics* p. 84; 3.1.7.7 *Metrics and Targets* p. 103
ESRS S2	Workers in the value chain	SBM-2	1.3.2 *Interests and Views of Stakeholders* p. 10
		SBM-3	3.2.2 *Material Impacts, Risks and Opportunities* p. 104
		S2-1	3.2.3 *Policies and Engagement* p. 105
		S2-2	3.2.3 *Policies and Engagement* p. 107
		S2-3	3.2.3 *Policies and Engagement* p. 107
		S2-4	3.2.4 *Actions and Resources* p. 108
		S2-5	3.2.5 *Targets* p. 109

ESRS	Topic	Data requirement	Section and page number
ESRS S3	Affected communities	SBM-2	1.3.2 *Interests and Views of Stakeholders* p. 10
		SBM-3	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		S3-1	3.3.4 *Strategy and Policies* p. 111
		S3-2	3.3.4 *Strategy and Policies* p. 111
		S3-3	3.3.4 *Strategy and Policies* p. 111
		S3-4	3.3.5 *Actions* p. 112
		S3-5	3.3.6 *Targets and Metrics* p. 114
ESRS S4	Consumers and end-users	SBM-2	1.3.2 *Interests and Views of Stakeholders* p. 10
		SBM-3	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		S4-1	3.4.2.3 *Policies* p. 115; 3.4.3.3 *Policies* p. 119; 3.4.4.3 *Policies* p. 123
		S4-2	3.4.2.4 *Processes for engaging with consumers* p. 115; 3.4.3.4 *Processes for engaging with consumers* p. 120; 3.4.4.3 *Policies* p. 123
		S4-3	3.4.2.5 *Processes to remediate negative impacts and channels for consumers to raise concerns* p. 115; 3.4.3.5 *Processes to remediate negative impacts and channels for consumers to raise concerns* p. 121; 3.4.4.3 *Policies* p. 123
		S4-4	3.4.2.6 *Actions and Resources* p. 116; 3.4.3.6 *Actions and Resources* p. 121; 3.4.4.4 *Actions and Resources* p. 124
		S4-5	3.4.2.7 *Targets* p. 118; 3.4.3.7 *Targets* p. 122; 3.4.4.5 *Targets* p. 124
ESRS G1	Business conduct	GOV-1	1.2.1 *The Role of the Administrative, Management and Supervisory Bodies* p. 5
		IRO-1	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		G1-1	4.1.3 *Policies* p. 125
		G1-2	4.1.5.5 *Management of relationships with suppliers* p. 131
		G1-3	4.1.5.3 *Prevention and detection of bribery and corruption* p. 129 and 4.1.5.4 *Training on business conduct and anti-corruption* p. 130
		G1-4	4.1.6 *Targets and Metrics* p. 131
		G1-5	Not material
		G1-6	4.1.5.5 *Management of relationships with suppliers* p. 131

2 Environmental Information

2.1 ESRS E1 – Climate Change

2.1.1 Introduction

With the launch of the Eyes on the Planet sustainability program in July 2021, EssilorLuxottica committed to addressing sustainability at every stage of its value chain, starting from its vertically integrated business model.

In this respect, the Company aims to act as an example in the industry on the transition toward a low-carbon economy and climate-resilient business models. Through the Eyes on Carbon pillar of its sustainability program, the Group is contributing to the global agenda of tackling climate change.

This section provides an overview of policies, actions, metrics and, when available, targets to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities related to climate change.

2.1.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome*.

Material ESG Topic	IRO name	Policy	Main actions	Target/Metric
Climate Resilience	Adverse social impacts due to the disruption in operations caused by extreme climate events	• EHS Policy • Climate Transition Plan • Energy Management Policy • Business Partners' Code of Conduct	• Product evolution • Logistics optimization • Supply chain optimization • Upstream improvement	• 42% absolute reduction of Scope 1&2 GHG emissions by 2030 from a 2022 base year • 25% absolute reduction of selected Scope 3 GHG emissions categories by 2030 from a 2022 base year
	Disruption of activities due to extreme climate events (e.g., hurricanes, floods, etc.)			
Climate Transition	Risks associated with transitioning to a lower-carbon economy (policy, legal, technology and market changes)			
	Energy consumption and GHG emissions			

The Company assesses both physical climate risks (risks related to the physical impacts of climate change) and transition risks (risks related to the transition to a lower-carbon economy), in line with CSRD requirements and TCFD recommendations (Task Force on Climate-Related Financial Disclosures), to anticipate potential operational, financial and reputational impacts and strengthen the climate resilience of its activities.

Identification and management of physical climate risks

Since 2021, EssilorLuxottica has been performing physical climate risk assessments to better understand its exposure to climate-related risks. In 2022, the Group updated and expanded this assessment to cover all of its activities, including manufacturing and logistics facilities, offices and directly managed stores. In total, 616 Group assets, based on their insured value, (including 84 stores representative of the footprint) have been analyzed (please refer to Chapter 1 of the 2025 Universal Registration Document regarding the number of stores and sites of the Group). An external climate risk platform has been used to assess asset-specific exposure based on GPS coordinates or addresses. The model evaluates four chronic climate hazards (heat stress, sea level rise, precipitation and drought) and three acute climate hazards (tropical cyclones, extreme flooding and fire weather) over the mid-term (2030) and long-term (2050 and 2100). The other climate–related risks were not considered relevant due to the Group's activities and locations. The analysis draws on the following three IPCC "Representative Concentration Pathways" (RCP) scenarios:

- RCP 2.6 (>+1.5 °C by 2100) – consistent with the Paris Agreement, in which energy transition is considered in accordance with the ambitious mitigation goals;
- RCP 4.5 (+2-3 °C by 2100) – a specific scenario with limited action in which temperature increase estimates are considered with current global policies announced;
- RCP 8.5 (>+4 °C by 2100) – the worst-case climate scenario, in which no specific climate-change mitigation measures are implemented.

A dedicated risk scale, from 1 (lowest) to 5 (highest), has been defined for each climate-related risk (e.g., number of days in heatwave, or drought duration per year) to clearly identify the potential gross risks (i.e., the inherent risk before any mitigation measure is implemented) for the Group's analyzed assets. This updated climate risk model helps the Group screen the physical climate risk exposure of a specific site, anticipate and prepare for potential climate hazards, raise awareness and protect employees in urgent situations and improve the resilience of its assets and supply chain.

According to this model, the Group's main gross climate-related risks are precipitation, heat stress and extreme flooding in countries such as China, Thailand, the United States and the Philippines. The assessment also supports management decisions when evaluating a new building project or potential acquisitions.

In addition, resilience to major threats is verified and strengthened through site visits conducted by the Property and Asset insurer, as part of the Group's loss prevention and business continuity approach. For example, flood-related mitigation measures usually involve the implementation of a flood emergency response plan that may also include the installation of physical barriers to prevent water intrusion.

Besides, the processes implemented under ISO 14001, ISO 50001 and/or ISO 45001 serve as further mitigation measures and contribute to employee safety (see Sections 2.1.5 *Actions and Resources* and 3.1.3.6 *Actions and Resources*).

EssilorLuxottica's diversified geographical footprint of manufacturing and logistics facilities, distribution networks and human capital across more than 150 countries also provides a strong safeguard against unexpected events, including extreme climate ones.

A dedicated in-depth analysis of climate-related risks across the value chain will be started in 2026.

Identification and management of transition climate risks

The Company may be exposed to extensive policy and regulatory changes, technology limits, market shifts or reputational risks throughout the global transition toward a lower-carbon economy.

In addition to the double materiality assessment, a first dedicated analysis of transition risks was performed in 2024 on EssilorLuxottica's own operations, using the Net Zero emissions by 2050 scenario (consistent with limiting global warming rise to 1.5 °C) to stress-test business resilience together with climate scenarios from the Network for Greening the Financial System (NGFS) data for 2027 (short term) and 2030 (medium term). The scenario assumes coordinated action by governments, businesses, investors and citizens outlining the key milestones to shift the global economy from fossil fuels to renewable energy sources. Some of the assumptions in the IEA NZE scenario[1] are summarized below:

- Economic:
  - carbon price for electricity, industry and energy production,
  - electricity as the new focus of the global energy system,
  - lower share of oil/coal;
- Technology:
  - increases in the price of raw materials to make clean energy technologies,
  - renewables and nuclear energy dominating the growth of global electricity supply.

The main gross risks identified are:

- Policy and Legal:
  - pricing of GHG emissions including Scope 3 emissions due to regulatory pressures or the emergence of new stringent climate regulation – e.g., carbon pricing intensification,
  - increasing focus on circular economy and waste management (especially regarding plastics);
- Technology:
  - costs to transition to lower-emission technology;
- Market Risks:
  - sustainable sourcing of key materials (e.g., instability of supply and demand).

These risks might lead to the inability for EssilorLuxottica to achieve its climate commitment or adapt its business model. Moreover, delays in delivering its climate roadmap may be caused by a lack of proper organization, expertise and resources, further impacting the Group reputation and its external perception. However, no assets and business activities that are incompatible with or need significant efforts to be compatible with a transition to a climate-neutral economy have been identified.

As described in the following sections, the Group has invested in renewable energy deployment (see Section 2.1.5 *Actions and Resources*), and new facilities are designed to meet high energy-efficiency standards and low fossil fuel dependence. Besides, the SBTi-aligned trajectory will significantly reduce the impact of the Group's own operations, while also engaging key suppliers in the decarbonization journey.

The deployment of the Company's climate initiatives is reflected in the Group's operating expenses and investments accounted for during the year, as well as in the medium-term projections used to perform 2025 annual impairment tests (see Note 10.1 *Impairment Tests* in Chapter 5 of the 2025 Universal Registration Document) and in the 2026 budget preparation. No other climate-related material impacts were reflected in the 2025 financial statements.

[1] *Assumptions from the International Energy Agency, Net Zero by 2050 scenario.*

2.1.3 Transition Plan for Climate Change Mitigation

As a significant milestone in its long-term commitment to addressing climate change, EssilorLuxottica set its first science-based emissions reduction targets in 2024. These targets, which cover the Company's entire value chain, were defined on the basis of its 2022 Group Carbon Footprint Assessment, and are in line with the Paris Agreement goals.

The Group's targets, validated in November 2024 by the Science-Based Targets Initiative (SBTi), aim to:

- reach a 42% absolute reduction of Scope 1&2 GHG emissions by 2030 from a 2022 baseline, in line with near-term criteria for targets on the "1.5 °C" path;
- reach a 25% absolute reduction of Scope 3 GHG emissions in the identified categories (purchased goods and services – not including Equipment, Instruments and Wearables sub-categories, fuel- and energy-related activities, upstream transportation and distribution and waste generated in operations) by 2030, from a 2022 baseline, in line with near-term criteria for targets on the "Well below 2 °C" path.

The target established for Scopes 1 and 2 covers 100% of the GHG emissions, while the Scope 3 target encompasses more than 70% of total Scope 3 GHG emissions calculated with reference to the 2022 baseline. The year 2022 was selected as the base year as it represents the first period with fully consolidated and reliable data after the combination of Essilor and Luxottica and the acquisition of GrandVision. As such, it provides a representative view of the Company's activities and related emissions.

These targets and associated decarbonization levers have been internally defined through a cross-functional task force including the EHS, Procurement, Logistics, Supply Chain, Product and Operations Sustainability and Corporate Sustainability functions. More information on targets is presented in Section 2.1.6 *Targets*.

To achieve the above-mentioned targets, EssilorLuxottica has defined a set of carbon-reduction priorities across its value chain:

- **Product Evolution:**
  - increasing the use of renewable energy – To reduce the Group's own emissions (Scope 1 and Scope 2), actions on renewable energy have been largely accelerated. This includes investments in self-produced renewable energy through a dedicated roadmap and the procurement of externally produced renewable energy (via Power Purchase Agreements or renewable energy certificates) supported by a formalized renewable energy purchasing roadmap,
  - operations efficiencies – Reducing the consumption of resources (raw materials, energy and water) and minimizing waste generation are the Group's priorities. This is pursued through continuous process optimization, innovation and consolidation of its industrial footprint to enhance operational efficiency;
- **Supply chain optimization** – Emissions reductions are also achieved through near shoring and network optimization initiatives (e.g., relocating part of production closer to market demand, consolidating Rx labs, complete-pair offerings, etc.);
- **Logistics optimization** – Projects span from modal shift (in transportation) to the optimization of all shipments' preparation, while constantly monitoring all logistics flows and network efficiency;
- **Upstream improvement and other initiatives** – Additional emissions reductions will also be achieved with the involvement of direct suppliers in lowering their own emissions. Employees and customers are encouraged to participate in sustainability training and awareness initiatives offered through Leonardo, the Group's digital learning platform.

To find out more about the above-mentioned levers, refer to Section 2.1.5 *Actions and Resources*. Regarding Taxonomy (refer to Section 2.5 *EU Taxonomy Disclosure*), the Company is committed to further strengthening its alignment with the applicable standards and will continue to work to integrate more projects and initiatives into alignment frameworks over time.

EssilorLuxottica's Climate Transition Plan, approved by the Board of Directors, is integrated into the Company's strategy and contributes to strengthening business resilience. Its implementation results in Group-wide interventions designed to deliver measurable progress toward the 2030 carbon emissions reduction targets. These initiatives include efficiency programs that deliver emissions reductions as well as investment evaluation and planning. Sustainability-related capital and operating expenditures are part of EssilorLuxottica's annual financial planning cycle, focusing on strategic and priority areas, including self-produced renewable energy, renewable energy purchasing, the upgrading of technical equipment and investments in R&D (e.g., research into new innovative materials, eco-design supported by LCAs, internal recycling processes and upcycling processes to improve end-of-life).

The progress against the Company's science-based targets is closely monitored by a dedicated cross-functional task force that meets twice a month (see Section 2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)* of this document).

Emissions associated with the "use of sold products" account for approximately 2% of the total GHG footprint and therefore do not represent a structural barrier to the achievement of its decarbonization pathway. In this respect, it is worth mentioning that the Company's emissions reduction targets are not constrained by locked-in GHG emissions, as EssilorLuxottica does not manufacture GHG- or energy-intensive products. Moreover, regarding assets owned and operated by the Company:

- Existing facilities – the Group uses natural gas for heating and diesel fuel for emergency generators in the event of electricity outages, as well as petrol and diesel for part of its company car fleets. Production machinery and equipment run predominantly on electricity. Old equipment and installations are progressively being replaced with higher-efficiency technologies to reduce energy consumption and associated GHG emissions;
- New facilities – all newly constructed sites are designed and built according to high energy performance standards and low fossil fuel dependency.

2.1.4 Policies

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies*.

Document	Function	Scope	Availability
Environment, Health & Safety Policy	EHS	Own operations	Public
Climate Transition Plan	Corporate Sustainability and Product & Operations Sustainability	Value chain	Internal
Energy Management Policy	EHS	Own operations	Internal
Business Partners' Code of Conduct	Compliance/Sourcing & Procurement	Upstream and downstream	Public

2.1.5 Actions and Resources

To implement its strategy and achieve its commitments, the Company, through the coordinated involvement of the relevant functions, has identified a series of decarbonization initiatives, which are described below.

Product evolution

Increasing the use of renewable energy

In 2025, the Group installed or started up various on-site renewable energy plants across eight sites in five countries (China, Germany, Italy, Laos, Thailand). These projects collectively add 10 MWp of new capacity. On a full-year basis, these projects generate approximatively 31,450 MWh/year of renewable energy and reduce approximatively 8,800 tCO_2e/year, contributing to progress on the Group's near-term science-based emissions reduction targets.

Of these, the most important projects in the reporting year, in terms of CO_2e reductions, are:

- Biomass plant in Agordo (Italy) – installation of a 5 MW biomass facility capable of producing 25,300 MWh/year of thermal energy. The plant uses residual biomass sourced from local forest maintenance and is expected to supply up to 90% of the site's heating needs and up to 50% of its cooling needs;
- Photovoltaic installation in Chonburi (Thailand) – deployment of 1.6 MWp of photovoltaic panels, able to generate approximately 2,300 MWh/year of renewable energy.

In 2025, EssilorLuxottica inaugurated its first major industrial area redevelopment project with an initiative that embraces innovation, sustainability and local enhancement. The "Barberini Oasis" covers 40 hectares near the Barberini plant, including a large solar park, with a total capacity of 20 MW covering an area of 25 hectares, capable of generating over 30,000 MWh of clean energy per year. The photovoltaic system, entirely built and managed by EssilorLuxottica, is directly connected to the Barberini plant and aims to maximize the self-consumption of energy produced on site. In addition, a green area hosts spaces for agricultural crops such as olive trees, Abruzzo pear tomatoes and honey plants on land adjacent to the factory (see 3.1.2 *Employee Engagement & Well-Being*).

The results achieved through the renewable energy roadmap of onsite projects since the start of their implementation are presented below:

	2013-2024	2025	Total
Projects finalized/in progress *(number)*	41	8	49
Capacity *(MWp)*	52.4	10 (thereof 5 of biomass)	62.4
Nominal production *(MWh/y)*	76,700	31,450 (thereof 25,300 of biomass)	108,150
Nominal production for self-consumption *(MWh/y)*	48,900	29,800	78,700
Nominal CO_2 avoidance *(tCO_2e/y)*	39,809	8,820 (thereof 5,300 of biomass)	48,629
Nominal CO_2 avoidance from self-consumption *(tCO_2/y)*	24,283	8,360	32,643

Considering the actual operating hours of all on-site renewable energy plants in 2025, including the ones started up during the year and therefore contributing only partially, the Group generated around 90,000 MWh, thereof 62,300 self-consumed on site. Had the Group not consumed this renewable energy produced on site and relied on non-renewable energy, this would have amounted to 27,500 tons of CO_2e.

Over the next five years, the Group's renewable energy roadmap foresees the deployment of additional on-site generating assets across different countries and the achievement of a total on-site production of renewable electricity of more than 110,000 MWh/year of renewable energy, reducing more than 55,000 tCO_2e/year.

In parallel, the Group continued to expand the procurement of renewable energy worldwide in 2025. Renewable energy already covers a significant share of electricity consumption across sites, offices and stores in Europe, as well as in recently added countries such as India and Laos. In addition to investing in onsite renewable energy generation for self-consumption, the Group has continued to retire Energy Attribute Certificates (EACs), ensuring that renewable energy is purchased, tracked and utilized. The sourcing of EACs has been prioritized in countries with high electricity consumption and high emission factors. In 2025, more than 1,000,000 MWh of renewable energy was procured through EACs, representing more than 650,000 tons of CO_2e.

Operations efficiency

Improving energy efficiency

Across Group Operations, several major energy-efficiency initiatives have been implemented in different business units and regions.

1. **Cooling optimization:** building on the strategy started in 2024, the Group continued replacing older cooling installations with high-efficiency units or optimized designs. As cooling is a major source of energy consumption, six new projects – covering replacement, optimization and redesign – were approved and executed in 2025. This program will continue through 2030, with a focus on emerging technologies and the global adoption of best practice.
2. **Electric motors:** targeting the largest electric motors, the Group continued to reduce energy use by replacing existing units with high-efficiency models, enabling 3-5% of energy savings. In 2025, more than 60 motors were replaced in mass production facilities. The initiative will continue in 2026, with full replacement of existing applications in mass production expected by 2028 and progressive expansion to the other major business units.
3. **AR Ecokit:** Satisloh introduced the anti-reflective Ecokit to reduce the energy impact of thin-film coating equipment, which is one of the most energy intensive technologies in the lens manufacturing process. The solution minimizes heat dispersion and lowers energy consumption during the idle/no-added-value steps of the process. It is now a company standard for new machines, while a roll-out plan aims to install it for all existing applications in the different geographies by 2026.
4. **Vacuum turbo pump:** in anti-reflective (AR) coating applications, the Company started testing and validating turbo pumps in 2025 as an alternative to current technical solutions. This optimization is expected to deliver around 10% of energy efficiency gains for the entire process. Three facilities adopted turbo pumps in 2025 and wider deployment is planned for both new and existing applications.
5. **Compressed air systems:** several actions were implemented in 2025, including the recovery of compressor heat to produce hot water for the industrial processes and the reduction of air-network pressure. This has been deployed across five sites leading to significant consumption reductions. The first facility fully heated through internal energy recovery was built in France and ramped up in 2025 with significant results. Compressed-air optimization and leak detection remain key areas of best-practice sharing across the Group.

Waste minimization and circularity initiatives (switch to more sustainable material, especially recycled ones, and new design, i.e., slim fit) that contribute to the carbon footprint reduction are described in Section 2.4 *ESRS E5 – Resource Use and Circular Economy*.

EssilorLuxottica has also implemented environmental management systems that conform to the ISO 14001 standard. As a result, 74% of its manufacturing sites were certified ISO 14001 in 2025. In addition, 27 lens laboratories, six distribution centers and four corporate offices were certified as well, overall covering 70% of the Operations headcount and around 39% of the total Group headcount.

Moreover, associated with the Company's efforts to improve energy efficiency and structure its energy management systems, 11 of its manufacturing facilities have obtained ISO 50001 certification over the years, representing 23% of manufacturing sites. In addition, one lens laboratory, four distribution centers and three corporate offices have obtained ISO 50001 as well, leading to an overall coverage of 27% of the Group headcount for Operations and 15% of the total Group headcount.

Supply chain optimization

In 2025, EssilorLuxottica pursued its program to build a sustainable supply chain, relying on the following four pillars:

- reduce carbon footprint, notably by flow optimization and vertical integration; thus, the orders to be served by the retail stores are progressively centralized in the industrial laboratories network, leveraging better technologies, industrial efficiency and stock pooling;
- support circularity initiatives, like the second-hand eyewear offers, notably by assessing end-of-life management and its impacts and opportunities in retail;
- switch to lower-carbon transport, notably by increasing the share of "alternative to air" for product flows;
- monitor and track progress.

To support the projection of the main supply chain flows (frames, components and finished and prescription lenses), a digital modelling and simulation of the Group's own manufacturing and logistic footprint has been designed, leveraging LCA. The simulation delivers a five-year plan projection of the footprint and associated impacts, specifically on raw materials, energy and logistics. This innovative tool has been analyzed by external experts and is in the process of being patented; it is designed to help the Group analyze scenarios and support strategic decision-making in manufacturing.

Finally, a whole program of awareness and training on sustainability culture has been put in place for the logistics and supply chain management levels, to be extended in the future.

Logistics optimization

Transportation and distribution of products account for some of the most important indirect carbon emissions sources. The Company has a team dedicated to low-carbon supply chain initiatives, including carbon reporting guidelines, engagement with suppliers and action plans to reduce GHG emissions. The Logistics function has defined an integrated strategy based on five pillars, explained below, which contribute to reaching the Group near-term carbon emissions reduction targets by 2030.

Alternative-to-air for non-urgent orders (sea or ground transportation)

Because more than 90% of the Group's Logistics-related CO_2e emissions come from air transportation, the Company has identified "alternative-to-air" transportation services with acceptable lead times on several major international lanes. These include, for example, rail transport from Asia-Pacific to Europe, the Middle East and Africa, and fast boat solutions from Asia-Pacific countries to North America. This initiative was boosted in 2024 and 2025 with the shift to ocean and rail shipments for frames moving from Asia-Pacific to EMEA and North America. In the coming years, the Group plans to continue increasing the share of "alternative-to-air" transportation modes, which will be a key driver in meeting its near-term CO_2e emissions reduction targets by 2030. For both frames and lenses, the objective is to progressively increase the proportion of "alternative-to-air" transportation between 2024 and 2030, from 7% to 40% for frames and from 60% to 80% for lenses. In 2025, the "alternative-to-air" performance for international frame shipments already showed an increase from 7% in 2024 to 25%.

Air fleet renewal & optimized routing for urgent orders

At the beginning of 2024, EssilorLuxottica started an initiative to encourage its suppliers to adopt air transport solutions with the lowest CO_2e emissions, combining next-generation aircraft with more efficient, optimized routing. Through an exhaustive assessment of the options offered by logistics partners, the Group found that CO_2e emissions on international air shipments can be reduced by up to 35%. This reduction reflects the difference between older passenger aircraft operating multi-stop itineraries and, by contrast, direct cargo routes flown with the latest aircraft models. This initiative is part of a broader strategy that will be progressively deployed across all high-volume international lanes by 2030. In 2024, it was applied to 18 international lanes, whereas in 2025 it was expanded to cover more than 300 routes.

In addition, this performance criterion is included in the annual RFQ process for allocating international lanes to suppliers. Monthly monitoring ensures that suppliers meet their commitments regarding emissions on the awarded transport lanes.

Last mile segmentation

Another initiative to reduce logistics-related emissions focuses on maximizing the use of road transportation for regional flows, benefiting from an emission factor intensity five to 10 times lower than that of air freight. As part of its efforts to decarbonize logistics, EssilorLuxottica has also invested in electric mobility for goods transportation. Since June 2024, an owned electric truck has been operated to transport goods from the Sedico distribution center in Italy to the hub of a national logistics partner.

Shipment optimization

Over the past two years, several actions have been introduced and progressively deployed across several Group entities to optimize shipment preparation. A major effort concerns the systematic consolidation of shipments from different entities and different commodities within the same country, as well as shipments to multiple customers within the same region. The Group has also widely adopted stackable pallets to further enhance loading efficiencies. These actions enabled EssilorLuxottica to reach an average container fill rate of approximately 80% for shipments from Asia and Latin America in 2025 (74% in 2024). Also the fill rate of carton boxes used for finished and semi-finished lenses shipped from Asia, North America and Latin America increased to 82% in 2025.

Industrial process and network optimization

The Group is leveraging the nearshoring of some lens volumes previously produced on Asian manufacturing sites, thanks to increased automation in semi-finished lens casting processes. As this automation is progressively deployed through 2030, more lens production volumes will be shifted to European and American manufacturing sites to serve their respective markets, thereby also shortening transport distances and reducing associated carbon emissions.

Moreover, the Group is developing lighter semi-finished lenses, which will further contribute to lowering CO_2e emissions from transportation.

Upstream improvement and other initiatives

Building guidelines

The Company's "New Building Guidelines" include criteria aligned with achieving LEED Gold certification for all its new manufacturing and distribution buildings. They also integrate climate-related criteria such as consideration for renewable energy, air emissions, water risk management, waste management and selection of site locations that incorporate climate risk analysis. These criteria ensure that building design and construction respect the surrounding ecosystem, and they have been applied to the facilities built in France, Thailand and Mexico in recent years. Sustainability considerations are also applied to the Group's retail network, as described in Section 2.4 *ESRS E5 – Resource Use and Circular Economy*. As an example, the EssilorLuxottica Excellence Laboratory, inaugurated in 2025 by French President Emmanuel Macron, is the first French industrial site striving for LEED Gold certification. The facility is entirely powered by renewable energy. It includes 3,700 m² of photovoltaic panels, supplying 15% of its energy needs. Thanks to various implemented initiatives, including fluid filtration systems, energy consumption per lens is reduced by 64%.

In late 2025, the Group launched a pilot phase of a Retail Construction Carbon Footprint calculator. Using ISO 14067 and ISO 14044 methodologies, the tool analyzes the lifecycle of a store, identifies emissions hotspots and potential areas for improvement and supports the implementation of actions to reduce the Company's carbon footprint.

Engaging all stakeholders on the climate journey

Communication and training initiatives related to the Eyes on the Planet program for employees and customers support the execution of the Group's climate actions and measures. For example, the Eyes on the Planet Newsletter expanded its reach in 2025, with each issue sent to over 110,000 employees and highlighting climate initiatives and key sustainability projects within the Group.

To strengthen awareness, a dedicated dashboard displaying key environmental performance information is regularly updated and made available on the Group's main Operations sites.

In addition, interactive climate change awareness workshops, designed for small groups to better understand climate change consequences and encourage individual engagement reached more than 5,300 employees across 55 countries, counting a total of more than 1,300 workshops delivered since their launch in 2020. Virtual classrooms on climate change are also regularly hosted on the Leonardo learning platform.

To support its climate journey, EssilorLuxottica seeks to work with Business Partners that run their businesses and supply chains responsibly and in compliance with applicable laws and regulations and, more specifically, that are keen to address climate change and preserve the environment by reducing energy consumption, limit the carbon footprint across the value chain and be resilient to climate-related risks. Environmental criteria are assessed through the EcoVadis platform and on-site Responsible Sourcing audits. The Responsible Sourcing team defines requirements and related evaluation criteria to seek and assess suppliers' answers to questions dedicated to climate change and energy consumption. In general, suppliers must comply with all national laws and international regulations regarding environmental compliance and governance, which includes documentation on environmental permits/licenses and a clear identification of roles and responsibilities. For more information on the Company's Responsible Sourcing program, refer to Section 3.2 *ESRS S2 – Workers in the Value Chain.*

Reducing Scope 3 emissions is a key element of EssilorLuxottica's climate journey. As shown in Section 2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)*, Scope 3 emissions represent more than 89% of the Group's carbon footprint, with a significant part related to the purchasing of raw materials, components, products and services. Several of the Group's key suppliers, representing approximately 65% of emissions associated with purchased goods, were asked to complete a questionnaire aimed at gathering information about their sustainability strategy to reduce carbon emissions, the availability of emission factors and Life Cycle Assessment data for the products supplied to the Group.

This questionnaire was designed to engage suppliers, foster collaboration to reduce value-chain emissions and improve the accuracy of the Group's carbon footprint assessment. The same questionnaire has also been shared with major indirect procurement suppliers, those providing services to the Group. The objective is to obtain supplier-specific emission factors derived from GHG intensity ratios, such as the one disclosed by EssilorLuxottica in Section 2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)*. In 2025, this initiative resulted in the collection of new product-specific emissions factors from suppliers of different direct procurement categories, leading to an improvement of the Group carbon footprint assessment accuracy. In line with its new Scope 3 emissions reduction target, the Group will continue to engage its suppliers and business partners through dedicated initiatives designed to support them throughout the decarbonization process along the value chain.

Overall, the initiatives described in this section enabled the Group to reduce its emissions by approximately 700,000 tons of CO_2e in 2025 compared to the 2022 baseline. This figure excludes other variables that might affect the Group's emissions. The full GHG emissions trend is disclosed in 2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3).*

It should be noted that progress on these actions depends on several enabling conditions, including access to financial resources, local regulatory frameworks, energy market dynamics and the level of supplier engagement.

Information related to the EU Green Taxonomy is available in Section 2.5 *EU Taxonomy Disclosure*. Following the simplification of the Taxonomy regulation, certain energy reduction initiatives launched by the Group under the transition plan fall below the Taxonomy materiality thresholds (e.g., photovoltaic systems) or are currently non-eligible under the existing Taxonomy framework (e.g., eco-kit or replacement of high-efficiency motors). Accordingly, no direct reconciliation between the transition plan disclosed under ESRS E1-3 and EU Taxonomy-aligned CapEx is provided. The Company is continuously investing in its sustainability activities; nevertheless, following the internal assessment, the CapEx and OpEx associated with the transition plan have been assessed as not significant, as they remain below the applicable materiality thresholds, and are therefore not disclosed.

2.1.6 Targets

Since its creation, EssilorLuxottica has been committed to minimizing its environmental impact across the entire value chain and to mitigating the impacts of climate change.

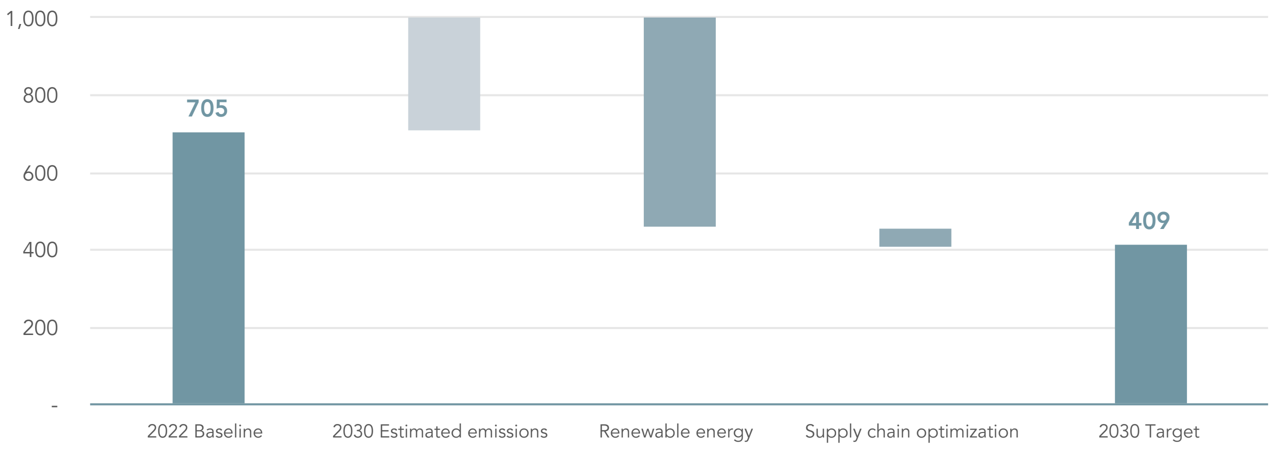
A significant milestone was reached in 2024 with the validation of the Company's near-term greenhouse gas (GHG) emissions reduction targets by the Science-Based Targets initiative.

As detailed in Section 2.1.3 *Transition Plan for Climate Change Mitigation*, EssilorLuxottica has committed to reducing absolute Scope 1 & 2 GHG emissions by 42% by 2030, from a 2022 baseline. Additionally, the Group has committed to reducing absolute Scope 3 GHG emissions – covering purchased goods and services (excluding the Equipment, Instruments and Wearables sub-categories), fuel- and energy-related activities, upstream transportation and distribution and waste generated in operations by 25% within the same timeframe.

To define its reduction pathway for Scopes 1, 2 and 3, the Group first modelled the projected growth of emissions to 2030 in the absence of mitigation measures. It then estimated the impact of each decarbonization lever over the same timeframe and applied these reductions to the model. These levers and their associated impact are presented in Section 2.1.5 *Actions and Resources*.

The charts below show the main carbon reduction levers that EssilorLuxottica has identified to achieve its 2030 targets for Scope 1 & 2 and Scope 3. The magnitude of the expected impact deriving from these levers will naturally evolve in line with the Group's internal strategies, progress and new initiatives:

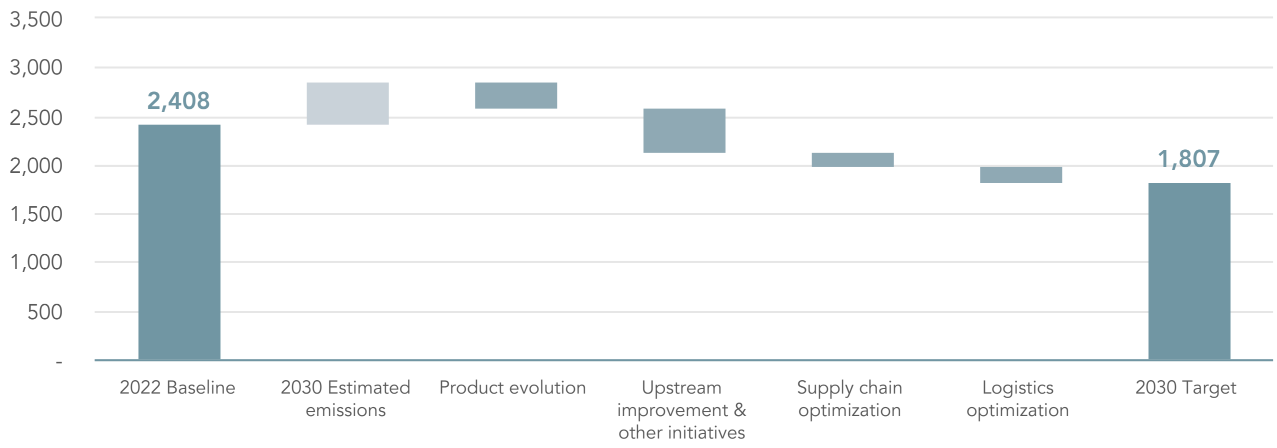
Scope 1 & 2 emissions reduction plan *(Ktons CO_2e)*



For Scopes 1 and 2, the Group will continue to invest in renewable energy production and procurement while further expanding the implementation of energy-efficiency best practices and optimizing its supply chain network.

In the 2022 baseline, Scope 1 accounted for 23% of combined Scope 1&2 emissions and Scope 2 represented the remaining 77%. The target for Scopes 1 and 2 has been validated by SBTi and is recognized as aligned with the 1.5 °C mitigation pathway.

Scope 3 emissions reduction plan *(Ktons CO_2e)*



For Scope 3, EssilorLuxottica intends to reduce emissions by advancing from the design and evolution of its products – lowering their energy and materials usage – while also leveraging the supply chain and logistics optimization measures previously described, as well as making improvements across the upstream part of its value chain.

The Scope 3 target has been validated by SBTi and is recognized as aligned with a "well below 2 °C" pathway, consistent with the short-term climate mitigation efforts outlined in the United Nations 2015 Paris Agreement.

The table below summarizes the Company's Scope 1&2 and Scope 3 science-based targets.

Emissions reduction targets – Scopes 1, 2 and 3	2022 (baseline)	2030 target	Absolute reduction	% reduction
Scopes 1 and 2 *($KtCO_2e$)*	705	409	-296	42%
Scope 3 *($KtCO_2e$)*	2,408	1,806	-602	25%
TOTAL *($KtCO_2e$)*	**3,112**	**2,215**	**-897**	

Consistency between the Company's GHG emissions reduction targets and its GHG inventory boundaries was ensured during the SBTi target submission and validation processes. The cross-sector pathway provided by SBTi was used. The target boundary includes land-related emissions and removals from bioenergy feedstocks.

No specific targets for 2050, intensity targets or dedicated targets for climate change adaptation, renewable energy deployment or energy efficiency improvements have been established.

2.1.7 Energy Consumption and Mix

The table below provides a summary of the Group's energy consumption for 2025 by energy type.

	2025	2024
Total electricity consumption *(GWh)*	**1,994.26**	**1,923.76**
Of which produced on site from renewable sources:	*46.71*	*20.90*
• *from photovoltaic panels*	*46.71*	*20.90*
Of which from renewable energy credits	*1,074.78*	*927.36*
Of which purchased from the local grids	*872.77*	*975.50*
• *from nuclear*	*90.00*	*94.97*
• *from fossil coal*	*158.12*	*224.23*
• *from oil*	-	-
• *from natural gas*	*297.37*	*330.40*
• *from other fossil fuel sources*	*24.96*	*20.84*
• *from renewable sources*	*302.32*	*305.06*
Steam, Heating, Cooling purchased for consumption *(GWh)*	**20.13**	**6.04**
• from fossil fuel sources	4.52	4.56
• from renewable sources	15.61	1.48
Liquid fuel *(GWh)*	**6.12**	**16.12**
• from fossil fuel sources	6.12	16.12
• from coal and coal product	-	-
• from crude oil and petroleum products	-	-
• from natural gas	-	-
• from renewable sources	-	-
Natural gas *(GWh)*	**201.85**	**215.01**
Fuel for company cars *(GWh)*	**5.85**	**4.97**
Coal and coal products	-	-
Other fossil sources	-	-
Non-renewable energy production	-	-
Consumption of self-generated non-fuel renewable energy	-	-
TOTAL FOSSIL ENERGY CONSUMPTION *(GWh)*	**698.80**	**816.13**
Share of fossil sources in total energy consumption *(%)*	31%	38%
Consumption from nuclear sources *(GWh)*	**90.00**	**94.97**
Share of consumption from nuclear sources in total energy consumption *(%)*	4%	4%
TOTAL RENEWABLE ENERGY CONSUMPTION *(GWh)*	**1,439.42**	**1,254.80**
Share of renewable sources in total energy consumption *(%)*	65%	58%
TOTAL ENERGY CONSUMPTION *(GWh)*	**2,228.22**	**2,165.90**

For more information on the reporting rules for energy and on the estimation methodology, please refer to Section 6 *Methodology Note*.

In 2025, the Group's total energy consumption registered a slight increase compared to 2024, with a significant increase in the use of renewable energy. In fact, thanks to constant investments and the progressive deployment of photovoltaic systems and the new biomass plant in Agordo, on-site renewable energy generation increased threefold compared to the previous year. Purchased renewable energy backed by Energy Attribute Certificates (EACs) also grew, rising by 16% compared with the previous year. In line with EssilorLuxottica's climate roadmap, the overall share of renewable energy consumption significantly increased in 2025, amounting to 65% of the total energy consumption.

Energy consumption in 2025 was distributed across geographies as follows: Asia-Pacific (53%), EMEA (23%), North America (13%) and Latin America (11%).

The Group's 2025 energy intensity was 0.08 kWh/€ (vs. 0.08 kWh/€ in 2024). The sector used is based on the NACE code "Manufacture of medical and dental instruments and supplies", which corresponds to the Group's primary activity. Revenues used in the intensity ratio amount to €28,491 million, as reported in Chapter 5 of the 2025 Universal Registration Document, Section 5.1.1 *Consolidated Statement of Profit or Loss*. No additional revenue streams were included in calculating GHG intensity.

Renewable energy credits

As described in Section 2.1.5 *Actions and Resources*, the Group continues to advance the global transition to renewable energy. Through its ongoing efforts to shift to renewable energy sources worldwide and the renewable energy purchasing program, the Group achieved an equivalent reduction of over 657,000 tons of CO_2e in its market-based carbon footprint for 2025. The contractual instruments used to source renewable energy in 2025 were distributed as follows: Green Electric Certificates (GECs) accounted for 39%, International Renewable Energy Certificates (I-RECs) accounted for 29%, Guarantee of Origin (GO) for 30% and Renewable Energy Guarantee of Origin (REGO) for 2%.

2.1.8 Total GHG Emissions (Scopes 1, 2 and 3)

EssilorLuxottica applies the Operational Control, as defined by the GHG Protocol to consolidate its GHG emissions. This choice reflects the Group's level of vertical integration and its commitment to accounting all emissions associated with the activities driven by the Group.

In 2025, EssilorLuxottica updated its global carbon footprint assessment to reflect the Group's ongoing evolution and integrate the most recent information and emission factors. This assessment resulted from a coordinated effort involving multiple functions, including Procurement, Logistics, EHS, Product & Operations Sustainability, Operations Engineering, HR, Real Estate and Finance. This refinement led to a re-assessment of the 2024 data, as disclosed in the table below, incorporating the latest methodological improvements and ensuring comparability with 2025. Following the GHG Protocol guidelines, the analysis provided a complete understanding of the Company's direct and indirect CO_2e impacts at each stage of the value chain, including a clear overview of all Scope 3 emissions relevant to the Group's activities.

	2025	2024 Restated	2024 Disclosed	Base year 2022	% of evolution 2025 vs 2022
SCOPE 1 GHG EMISSIONS *(tCO_2e)*	**118,744**	**116,092**	**116,092**	**160,244**	**(26%)**
Stationary combustion	38,963	49,536	49,536	56,644	(31%)
Mobile combustion	21,921	18,468	18,468	19,926	10%
Fugitive emissions	57,860	48,088	48,088	83,674	(31%)
LOCATION-BASED SCOPE 2 GHG EMISSIONS *(tCO_2e)*	**958,319**	**958,447**	**958,447**	**788,024**	**22%**
Electricity consumption – Location-based	957,106	956,580	956,580	787,360	22%
Company cars – Location based	290	133	133	215	35%
Steam	924	1,734	1,734	449	106%
MARKET-BASED SCOPE 2 GHG EMISSIONS *(tCO_2e)*	**381,685**	**475,555**	**475,555**	**544,442**	**(30%)**
Electricity consumption – Market-based	380,176	473,579	473,579	543,771	(30%)
Company cars – Market-based	586	242	242	222	164%
Steam	924	1,734	1,734	449	106%
SCOPE 3 GHG EMISSIONS *(tCO_2e)*	**4,144,791**	**3,831,997**	**3,528,307**	**3,422,043**	**21%**
1. Purchased goods and services	2,270,840	2,078,045	1,879,135	1,822,207	25%
2. Capital goods	405,619	370,364	370,364	439,864	(8%)
3. Fuel- and energy-related activities (not included in Scope 1 or Scope 2)	141,813	127,852	127,852	171,843	(17%)
4. Upstream transportation and distribution	446,022	391,997	390,546	431,587	3%
Of which logistics managed by EssilorLuxottica	*315,685*	*313,863*	*313,863*	*302,789*	4%
Of which logistics managed by suppliers	*130,337*	*78,134*	*76,682*	*128,798*	1%
5. Waste generated in operations	34,505	36,922	36,922	49,422	(30%)
6. Business travel	40,680	41,126	41,126	42,171	(4%)
7. Employee commuting	211,347	206,291	127,025	80,399	163%
10. Processing of sold products	375,726	383,781	383,781	161,543	133%
11. Use of sold products	109,716	101,326	80,879	72,826	51%
12. End-of-life treatment of sold products	60,837	49,930	46,315	59,219	3%
14. Franchises	32,497	34,434	34,434	46,291	(30%)
15. Investments	15,189	9,929	9,929	44,672	(66%)
TOTAL GHG EMISSIONS (LOCATION-BASED) *(tCO_2e)*	**5,221,854**	**4,906,536**	**4,602,846**	**4,370,311**	**19%**
TOTAL GHG EMISSIONS (MARKET-BASED) *(tCO_2e)*	**4,645,220**	**4,423,644**	**4,119,953**	**4,126,729**	**13%**
Scope 1&2 GHG emissions (market-based) part of the science-based target	500,429	591,647	591,647	704,686	(29%)
Scope 3 GHG emissions part of the science-based target	2,355,709	2,432,730	2,390,706	2,407,658	(2%)

EssilorLuxottica's reporting boundaries consider emissions from the relevant Scope 1, Scope 2 and Scope 3 categories. Scope 3 emissions from GHG categories "Upstream Leased Assets" (3.8), "Downstream Transportation and Distribution" (3.9) and "Downstream Leased Assets" (3.13) are excluded since they are considered not relevant or applicable to the EssilorLuxottica context. None of the Scope 1 GHG emissions are regulated by trading schemes. The Group, while disclosing both location- and market-based emissions, applies the market-based method for the planning and deployment of its decarbonization strategies, as well as for the emissions reduction targets set in the reporting year.

In 2025, total GHG emissions disclosed in the table above increased compared to the restated 2024 figures (+222 ktons CO_2e) due to the inclusion of integrated Med-tech operations and the remarkable growth in wearable glasses volumes. The GHG category contributing most to this overall increase is "Purchased Goods and Services" (3.01), reflecting the new integrations and wearables growth. Compared to the 2022 base year, emissions from "Processing of sold products" (3.10) and "Employee Commuting" (3.07) rose as a result of updated methodologies, specifically a substantial review of the emission factors applied to the number of sold lenses and updated country-level commuting statistics for employees across the Group.

However, focusing the analysis only on the GHG emissions in the categories included in the Company's science-based targets, a significant decrease can be appreciated in Scope 1 and 2 emissions compared to the baseline (-204 ktons CO_2e), as well as an improvement in Scope 3 emissions (-52 ktons CO_2e). The continued expansion of renewable energy use is a key driver of these reductions across Scopes 1, 2 and 3. In addition, in 2025, Scope 3 emissions decreased driven by the efforts to increase recycled and lower-carbon products and materials sourcing, enabled by the engagement of key suppliers.

The Group is also committed to reducing emissions in all other GHG categories, with the expectation that the different decarbonization levers described in Section 2.1.5 *Actions and Resources* will progressively contribute to further improvement of its carbon footprint. Moreover, EssilorLuxottica continues to explore new initiatives to lower its GHG emissions and considers stakeholder engagement as key to achieving a low-carbon future.

In 2025, the Company did not undertake any GHG removals or storage projects.

Finally, during 2025, the Group updated its stance on carbon credits, placing priority on reducing emissions directly within its the value chain, in line with its SBTi-validated near-term reduction targets.

In 2025, the distribution of Scope 1 emissions per geographical area was as follows: Asia-Pacific (35%), EMEA (40%), North America (16%) and Latin America (9%). The distribution of Scope 2 location-based emissions per geographical area was as follows: Asia-Pacific (65%), EMEA (14%), North America (14%) and Latin America (7%); as for Scope 2 market-based emissions, the geographical distribution was as follows: Asia-Pacific (40%), EMEA (10%), North America (33%) and Latin America (17%).

Biogenic CO_2 emissions occurring within the value chain are not included in the Scopes calculation, nor is the CO_2 uptake. This is because the share of biogenic materials used by EssilorLuxottica is not significant and the methodology applied to calculate the emission factors considered does not account for biogenic CO_2 emissions or removal. For more information on the calculation and estimation methodology including the emission factors used, please refer to Section 6 *Methodology Note*.

In 2025, EssilorLuxottica's carbon intensity per euro of revenue amounted to 0.184 kg CO_2e/€ for location-based emissions (vs. 0.185 kg CO_2e/€ in 2024 – restated) and 0.163 kg CO_2e/€ for market-based emissions (vs. 0.167 kg CO_2e/€ in 2024 – restated). The intensity calculations are based on Group revenues of €28,491 million as reported in the financial statements (see Chapter 5, Section 5.1.1 *Consolidated Statement of Profit or Loss* of the 2025 Universal Registration Document).

To respond to the increasing demand for environmental transparency, EssilorLuxottica has disclosed through the Carbon Disclosure Project (CDP) Climate Change questionnaire since 2022, and in 2025 received an "A" score (following an "A-" score in 2024), in recognition of the improved environmental disclosure and performance. In addition, in 2025, the Company completed its first EcoVadis sustainability assessment and was ranked in the 89th percentile, earning a Silver Medal[1].

No significant events or changes occurred between the reporting dates of the entities and the date of the general-purpose financial statements.

Finally, the Group, based on its activities, is not excluded from the EU Paris-aligned Benchmarks.

2.1.9 Internal Carbon Pricing

The Group has not yet introduced an internal carbon price, as it is currently assessing both the applicability and feasibility of such a mechanism in light of the existing and planned decarbonization levers across its operations. In this context, the financial and operational implications of adopting an internal carbon pricing scheme will also be evaluated.

2.2 ESRS E2 – Pollution

2.2.1 Introduction

EssilorLuxottica is committed to eliminating or minimizing all possible impacts on the environment and on Health & Safety deriving from its operations, products and stores throughout the design, manufacturing, distribution and use of its products. This means ensuring its products and operations are safe for its employees, customers and consumers, as well as for the environment, in compliance with chemical and product safety regulations. The Company maintains strict control over hazardous substances in its chemicals, materials and components, and replaces those presenting a risk to human health, regardless of exposure levels or potential mitigation measures.

This Section provides an overview of policies, actions, metrics and, when available, targets to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities related to pollution.

(1) *For more information please refer to Ecovadis Silver Medal | ESSILORLUXOTTICA SA.*

2.2.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome*.

Material ESG topic	IRO name	Policy	Main actions	Target/Metric
Pollution Prevention	Risk of infringements of pollution-related regulations and of costs due to remediation actions	• EHS Policy • Business Partners' Code of Conduct • Product Stewardship – Safety and Compliance of Chemicals, Materials and Components Policy • Group Water Management Policy • Environmental compliance policy	• Implementation of treatment systems • Periodical analysis • Mapping of chemicals used	• Zero PCL1 chemicals in its manufacturing processes • No introduction of PCL2 chemicals or PFAS for new products and processes
Product Safety	Potential impact on human health and the environment			

2.2.3 Policies

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies*.

Document	Function	Scope	Availability
Environment, Health & Safety Policy	EHS	Own operations	Public
Business Partners' Code of Conduct	Compliance/Sourcing & Procurement	Upstream and downstream	Public
Product Stewardship – Safety and Compliance of Chemicals, Materials and Components Policy	EHS	Own operations	Internal
Group Water Management Policy	EHS	Own operations	Internal
Environmental compliance policy	EHS	Own operations	Internal

In addition to these corporate policies, local procedures may also be implemented and overseen by local management to meet specific regulatory requirements, for example, emergency or incident action plans, investigation procedures and an approval process for new chemicals and direct materials.

2.2.4 Actions and Resources

In 2025, the Group introduced its Environmental Compliance Policy to ensure consistent adherence to all applicable environmental laws and regulations across sites, including compliance with permitting requirements and the prevention of water and air pollution. In 2025, the Group also published its global Water Management Policy.

The initiatives below outline the actions EssilorLuxottica has implemented to minimize or eliminate potential environmental and Health & Safety impacts across its value chain.

Water quality

The quantity and quality of water discharge are monitored and managed whenever operational processes could pose a risk, i.e., when it is known that specific chemicals or processes are used and could generate pollutants and as per local regulations. On-site wastewater treatment systems – integrating wastewater treatment and recycling of wastewater into a single flow or complete process – have been installed at EssilorLuxottica's facilities.

Suspended solid parameters are monitored through the "Wastewater Model" program, which helps to identify the necessary actions to prevent water discharges that exceed permitted limits, especially in situations where reduced water withdrawals may increase pollutant concentration. It also helps identify opportunities for closed-loop water solutions, making water reusable and suitable for manufacturing processes.

To reduce water use and recover wastewater, on-site closed-circuit water recycling systems have been installed across most prescription lens generation processes and in galvanizing and painting processes. In addition, a cascading water project for the hard-coating process has been completed in European Rx labs, enabling water to be reused across sequential steps of the process.

Air emissions

For air pollution control, the Company complies with international, regional and local regulations, applying and managing air emissions permits where needed. Through regional/local guidelines, the EHS function oversees the assessment of air permit needs and supports the business in applying for it and meeting all compliance obligations. Where specific requirements apply, appropriate treatment systems are installed and managed to guarantee compliance with all permitted parameters. For example, sites using coating processes are required to install regenerative thermal oxidizer systems to remove volatile organic compounds and comply with emissions limits. Periodic air-emissions analyses are performed at site level and submitted to local authorities as required, ensuring compliance with applicable regulations.

Microplastics and plastic pollution

Microplastics and plastic pollution are given great attention by the Company, ensuring that plastic particles are not released from its operations process into the environment.

Microplastics primarily originate from lens surfacing and edging, as well as from acetate frames cutting processes. Environmental and health and safety risk analyses are performed and the microplastics generated are collected as waste and either disposed of, thermally valorized (with ashes reused in downstream processes to avoid residual waste), or recycled for specific applications, in line with local regulations and the Group's waste recycling policy.

Substances of concern/high concern

In line with its Product Stewardship Policy, the Company strives to minimize the use of substances of concern.

Its prohibited and restricted chemicals list and Priority Chemical Levels (PCL) rules apply globally and are based on mandatory international regulations. Where evidence indicates potential risks to people and the environment, these internal requirements impose stricter limitations than local regulations. Three priority chemical levels (PCLs) and associated actions have been identified as follows:

- PCL1: prohibited chemicals: substitute it now, which means, the use of PCL1 chemicals is prohibited in any EssilorLuxottica workplace;
- PCL2: restricted chemicals: plan for replacement, implying that they are prohibited in case of any new chemical or direct material introduction, whereas for existing uses strong efforts must be made to identify and validate replacement solutions without undue delay;
- PCL3: chemicals that may be escalated: consider safer alternative wherever technically/economically possible.

All existing chemical inventories must be screened by facilities on a regular basis as per local regulations to track substances classified under PCL chemicals. Moreover, the Group has been developing a unified Chemicals Management tool to allow strict control over existing and newly introduced chemicals, managing compliance checks, industrial hygiene and risk assessments to proactively evaluate, manage and mitigate chemical-related risks. Also, the Company is currently working on a comprehensive global database of all environmental permits to support centralized compliance monitoring. This is an ongoing activity and the objective is to have full implementation in two years on a full scope.

As part of its sustainability initiatives and in line with regulatory frameworks, the Company regularly updates its internal list to include new hazard classes. At the same time, the Group continues to reinforce its due diligence processes to thoroughly assess all substances of concern – whether used in manufacturing, present in marketed products, or released into the environment – aiming to minimize such emissions and promote responsible chemical management.

Similarly, existing PFAS used within EssilorLuxottica are being replaced with non-PFAS alternatives in line with international and local regulatory timelines and the Group is committed to not introducing any new PFAS. Therefore, any new chemical or direct material containing PFAS cannot be approved unless exceptional circumstances apply (e.g., temporary unavailability of PFAS-free alternatives, or a formally granted derogation). Such temporary derogation requests must be reviewed and approved by Business Unit Leaders and the EHS function. Because PFAS information is often not disclosed in safety data sheets or other relevant documentation, and because no complete inventory of PFAS with associated CAS numbers currently exists, suppliers must provide specific information confirming their products do not contain PFAS. Accordingly, a signed PFAS declaration from the supplier is mandatory before any new chemical or direct material can be evaluated by EHS and introduced at a facility.

Building on previous years' efforts, the Company has evolved its approach by establishing an internal PFAS program and a technical team composed of EHS and engineering representatives to increase focus and oversight on the topic. In parallel, the Company completed mapping of all chemicals used internally and advanced its prioritization of PFAS elimination across manufacturing processes, based on risk assessments and chemical exposure evaluation for the main applications.

Value chain engagement

EssilorLuxottica oversees these risks along its value chain, monitoring the potential and actual impacts of its suppliers. As described in ESRS E1 in Section 2.1.5 *Actions and Resources*, the Responsible Sourcing team defines requirements and related evaluation criteria to seek and assess suppliers' answers on questions dedicated to the environment. Regarding air emissions and climate change, suppliers must comply with national legislation and commit to actions to tackle climate change on their own sites. In the context of Responsible Sourcing audits with suppliers, where relevant and necessary, suppliers must have appropriate permits for the management of waste and hazardous materials, including the identification of storage areas, clear labeling, bulk chemical storage, spill response, storage tanks, as well as solid waste, soil and groundwater management. For more information on the Company's Responsible Sourcing program, refer to Section 3.2 *ESRS S2 – Workers in the Value Chain*.

2.2.5 Targets and Metrics

Air and water emissions

Air and water emissions are tracked and monitored locally on Operations sites where required, ensuring compliance with applicable regulations, thresholds and permit conditions. The Group has also performed a comprehensive analysis across its largest sites, covering multiple countries and business units. This analysis confirmed that, in addition to meeting all local regulatory requirements, site-level emissions remain below the thresholds defined by ESRS and related regulations.

Substances of concern

Regarding substances of concern/high concern, EssilorLuxottica aims yearly at zero PCL1 chemicals in its manufacturing processes as well as no introduction of PCL2 chemicals or PFAS for new products and processes. In 2025, no new PCL1 chemicals have been introduced and no PCL2 or PFAS have been approved for new products/processes, through the corporate approval process.

To meet the reporting requirements of substances of concern, the Company is gathering a significantly large amount of detailed information, through the following actions:

- building an inventory of substances, identifying concentration ranges and hazard classes;
- collecting comprehensive data regarding the composition of components, materials and chemicals;
- consolidating substance quantities within products currently manufactured by the Company.

However, associated metrics are not yet consolidated at central level, as the Group is establishing the processes and controls required to collect, validate and aggregate this information across its operations. Once supported by reliable data, these processes will enable more comprehensive reporting on a relevant scope.

Microplastics

The Group continues to focus its attention to the reduction of microplastics' presence within its Operations processes. Microplastics generated in Operations are collected and managed as waste, with disposal, recycling or valorization treatments to ensure plastic particles are not released into the environment.

Extensive mapping of the different sources of microplastics generation is being performed in line with internal policies and circular strategies.

2.3 ESRS E3 – Water and Marine Resources

2.3.1 Introduction

Water is a key natural resource for the Company's activities, and it is a primary element for lens and frame manufacturing processes. Robust water management is not only important to ensure the quality, continuity and efficiency of production operations, but it is also essential for the well-being of the Group's employees and local communities where present.

This section provides an overview of policies, actions, metrics and, when available, targets to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities related to water resources.

2.3.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG topic	IRO name	Policy	Main actions	Target/Metric
Water Management	Risk of inefficient water management practices Use of water resources that might impact local communities and the environment	• EHS Policy • Business Partners' Code of Conduct • Group Waste Management Policy • Group Water Management Policy	• Designing new production processes • Metering and automation • Closed-circuit recycling systems	• Water withdrawals

2.3.3 Policies

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies.*

Document	Function	Scope	Availability
Environment Health & Safety Policy	EHS	Own operations	Public
Business Partners' Code of Conduct	Compliance/Sourcing & Procurement	Upstream and downstream	Public
Group Waste Management Policy	EHS	Upstream and own operations	Internal
Group Water Management Policy	EHS	Own operations	Internal

2.3.4 Actions and Resources

Priority is given to those water-saving solutions that can limit withdrawals, especially in the regions at risk, and avoid direct discharge, making it possible to recycle or repurpose process water internally. Through specific technical solutions, it is possible to close water loops in Operations, reducing withdrawal volumes and maintaining the quality required for water reuse.

Water risk assessment and reduction of water use

Water risks are periodically assessed in areas where EssilorLuxottica operates sites with the highest water withdrawal volumes. This enables the Company to identify potential impacts and monitor the implementation of water stewardship projects.

Based on an updated analysis conducted in 2025 using the WWF Water Risk Filter across the Group's sites with the highest volumes of consumption, none are currently located in areas classified as very high or extreme water scarcity risk. Nine sites – primarily in India, Thailand, Mexico and the US – are located in high-risk areas, with total water withdrawals in 2025 amounting to 1.561 million m^3.

EssilorLuxottica mitigates water-related risks by defining a more stringent water roadmap for high-risk sites including specific efficiency targets, water supply management, prioritized deployment of water policies, stricter performance monitoring, dedicated improvement projects and interaction with local communities. Overall, the Company undertakes several initiatives to reduce its water withdrawals, including:

- mapping water use in laboratories and manufacturing sites that exceed a defined withdrawal threshold or are located in water-stressed areas, and recommending this practice for all remaining sites;
- installation of smart meters to accurately measure water consumption with different levels of granularity, enabling structural improvements of traditional resource-intensive processes, such as galvanization or washing lines;
- benchmarking site water performance against a standardized process reference or "water model";
- installing closed-circuit water recycling systems across prescription lens generation processes – an internal best practice now standardized across the organization, with focus in North America and Mexico where water stress is relevant;

- defining medium-term site-level plans to reduce water use;
- adopting rainwater harvesting systems that collect and store rainwater from rooftops for later use, such as landscape irrigation, washing applications, ornamental pond and fountain filling, cooling tower make-up water and toilet and urinal flushing;
- collection and definition of best practices to help define future standards;
- designing new equipment with a reduced water withdrawal impact, as per the above-mentioned Group Water Policy.

Where water stress is material, the focus of the Company is on technologies whose water needs are zero or close to zero.

The Company is also planning dedicated activities on WASH (water, sanitation and hygiene), a comprehensive framework aimed at ensuring safe access to water, adequate sanitation services and the promotion of hygiene practices to protect health, support wellbeing and contribute to sustainable development. From a water management standpoint, the Company already applies WASH principles. Additional actions will be defined and planned in 2026.

Manufacturing sites

Frame and lens manufacturing are water intense due to washing systems needed at different stages of the production process. In this regard, the Company has invested in the continuous improvement of manufacturing processes to further reduce its environmental impact, such as the installation of evaporator systems and wastewater treatment systems.

In 2025, the Company continued investing in smart meters and preventive activities for water conservation, such as piping controls to detect leakage and strengthen best practices across the manufacturing sites. Significant progress was achieved in several frame-production facilities, particularly in China – with approximately 600 m^3 saved per day, where the sharing of best practices contributed to meaningful reductions in overall water consumption.

Sites in Italy invested in new technologies to optimize their water withdrawals. In Agordo, enhanced metering and automation enabled a 30% reduction in water consumption in an entire manufacturing department. In Pederobba, the introduction of water-recycling systems in cleaning units resulted in annual savings of more than 7,000 m^3.

Designing new production processes that eliminate water-rinsing steps or reduce current withdrawals is another area of focus, as highlighted in the Water Management policy. Several opportunities are currently being assessed with the development of new hard-coating equipment. This work will continue in 2026, alongside the definition of corporate guidelines for the most water-intensive processes.

Rx manufacturing process

The Company has continued to focus on hard-coating applications, with many sites increasing their water reuse rates. Hard-coating processes remain a major source of pilot projects and optimization proposals.

A water cascading project for hard-coating was completed in European Rx labs in 2024, saving up to 0.5 liters per lens and has since been extended to other eligible sites. In 2025, the Company also invested in new material developments to further optimize and reuse water from other types of hard-coating equipment, particularly those used in smaller facilities.

In 2025, the Company also invested in the design of a new closed-loop solution for surfacing processes, piloted in Thornbury (England). The pilot will help to create a new standard solution applicable to most laboratories, with an expected 10% reduction in total water withdrawals.

In addition, the Company will finalize, in 2026, the deployment of a coolant reuse solution that compacts surfacing residues and recovers filtered liquid for reuse in the process.

Cooling systems

Another initiative deployed across different regions and business units relates to the cooling systems using adiabatic technology (closed-loop cooling tower), which enables reuse of cooling water, maintains optimal water hardness and significantly reduces withdrawal volumes. This has been identified as a good practice and would be implemented in the main locations across multiple years.

For example, the Foothill Ranch site in California installed an electrochemical treatment that ramped up at the beginning of 2025 for its cooling towers, eliminating the need for fresh water additions and reducing withdrawals by more than 10%. The Company is assessing opportunities to replicate this or similar solutions at other sites, with priority given to those located in water-stressed areas.

Value chain engagement

In addition to the initiatives implemented within its own operations, EssilorLuxottica monitors water-related risks across its value chain, assessing both the potential and actual impacts linked to its suppliers. As part of the Responsible Sourcing audits program (ELRSM – *EssilorLuxottica Responsible Sourcing and Manufacturing Program*), suppliers are requested to monitor and report their water consumption and wastewater discharge and to have a wastewater treatment plant whenever applicable. In 2026, the Group plans to reinforce its engagement with its main suppliers on water-related issues, mirroring its approach on climate (e.g., by using questionnaires to gather information about their water strategy, reduction initiatives, water resilience). For more information on the Company's Responsible Sourcing program, refer to Section 3.2 *ESRS S2 – Workers in the Value Chain*.

2.3.5 Targets and Metrics

Given the Group's ongoing evolution and the integration of recently acquired entities, EssilorLuxottica is prioritizing the stabilization of its reporting perimeter to ensure that future water-related targets are robust and consistent over time. In the interim, the Company monitors the effectiveness of its current strategy primarily through its water withdrawal metric.

EssilorLuxottica has been reporting its water footprint for many years, detailing the withdrawals from various water sources across its operations sites and retail stores. The water withdrawn and managed within the Group's sites and facilities is discharged according to local regulations, with an actual consumption of water along its manufacturing processes that is considered not significant. Water consumption occurs primarily through limited vaporization within the cooling systems installed on the Operations sites, as well as through minor leakages or evaporation. For this reason, the Group considers its water discharges to be practically equivalent to its withdrawals and therefore continues to report water withdrawal data, broken down by source. Information on water reused and recycled is monitored locally on sites where such systems are in place. However, these metrics are not consolidated at Group level.

	2025	2024
TOTAL WATER WITHDRAWAL *(m^3)*	**10,466,530**	**11,108,868**
Third-party water	9,222,847	9,397,726
Natural water	1,243,683	1,711,141
of which surface water	*3,215*	*2,243*
of which groundwater	*1,240,469*	*1,708,898*

In 2025, the Group registered a notable reduction in total water withdrawal, which decreased by more than 5% compared to 2024. A particularly significant improvement concerns Natural Water consumption, which fell by over 20% year-on-year. The Company continued to implement efficiency actions to limit water withdrawals, with specific attention to groundwater used for geothermal purposes. As mentioned above, water withdrawn for manufacturing processes is almost entirely discharged after use, taking care of its reintroduction into nature or the grid. For additional information on the methodology of data collection and estimation, please refer to the Methodology Note in Section 6 *Methodology Note*.

As with climate change, EssilorLuxottica responds to the increasing demand for environmental transparency and in 2025 submitted the Carbon Disclosure Project (CDP) Water questionnaire, receiving an "A-" score (vs. "B" in 2024).

In 2025, EssilorLuxottica's water intensity per euro of revenue amounted to 0.37 liter/€, significantly decreasing compared to the 0.42 liter/€ of 2024). The revenue used to calculate the water intensity ratio is €28,491 million as mentioned in the financial statement in Chapter 5, Section 5.1.1 *Consolidated Statement of Profit or Loss* of the 2025 Universal Registration Document.

2.4 ESRS E5 – Resource Use and Circular Economy

2.4.1 Introduction

EssilorLuxottica's climate commitment is deeply intertwined with its circularity goals in its own operations and along the value chain, leveraging its sustainable innovation expertise across its materials, processes, products and services. One of the most important drivers of EssilorLuxottica's sustainability efforts is the idea that sustainability, products and services go hand in hand, right from the development phase. Aligned with the Eyes on Circularity pillar of the Eyes on the Planet sustainability program, the Group continues to advance its commitment to transitioning from a linear to a circular economy, leveraging sustainable innovation expertise across materials, processes, products and services, while optimizing resources and ensuring high product standards. In 2025, the Group took its efforts further by announcing a new objective to reduce single-use plastic packaging[1] by 2030.

This section provides an overview of policies, actions, metrics and, when available, targets to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities related to resource use and circular economy.

[1] *Single-use plastic packaging is an item made of plastic, specifically placed on the market to be used once and for the purpose for which it was designed. Unlike reusable plastic items, single-use plastics are not intended for repeated use and lack the durability to be repurposed.*

2.4.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome*.

Material ESG topic	IRO name	Policy	Main actions	Target/Metric
Circular Sources, Products and Services	Use of raw materials and natural resources	• Group Circularity Policy • Global Environment, Health & Safety Policy • Business Partners' Code of Conduct • Sustainable Packaging Policy • Point of Purchase (POP) Sustainability Policy • Waste Policy • Material Recycling Policy	• Use of responsible materials • Adopt eco-design principles and Life Cycle Assessments • Valorize internal material waste • Develop care, repair and recycling services • Processes improvements to reduce or valorize waste	• Shift from fossil-based materials to biobased and/or recycled materials • Embed eco-design in all innovation developments by 2025
	Developing alternative materials (to the benefit of the entire industry)			
	Risk of limited access to certain raw materials (scarcity, stringent regulations)			
	Risk of not answering product and services sustainability expectations			
Waste Management	Waste generation			• Increase waste valorization rate by 10 points by 2029 (compared to 2024) • Reduce single-use plastic packaging by 60% in B2C and 30% in B2B streams by 2030 (compared to 2023)
	Risk of lack of compliance with waste regulations			

2.4.3 Policies

Resource use and circular economy topics are incorporated in several existing policies and guidelines, listed in the table below.

In addition, the Company's commitment to circularity is supported at the highest level. Oversight is provided by the Board of Directors, which supervises the broader sustainability strategy and its execution under the Eyes on the Planet program. The Chief Corporate Sustainability Officer, along with other relevant top managers, provides regular updates to the Board and its committees. A cross-functional task force, including Corporate Sustainability, R&D, Product & Operations Sustainability and EHS functions, coordinates the deployment of fundamental workstreams, spreads internal policies, eases collaborative projects, supports key decision-making, ensures program progress and facilitates alignment between functions. Training in circular economy principles is made available to employees and customers through the Leonardo platform.

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies*.

Document	Function	Scope	Availability
Circularity Policy	Corporate Sustainability	Own operations	Public
Environment, Health & Safety Policy	EHS	Own operations	Public
Business Partners' Code of Conduct	Compliance/Procurement (Responsible Sourcing)	Upstream and downstream	Public
Sustainable Packaging Policy	Product & Operations Sustainability	Upstream and own operations	Internal
Point of Purchase (POP) Sustainability Policy	Product & Operations Sustainability	Upstream and own operations	Internal
Waste Policy	EHS	Upstream and own operations	Internal
Material Recycling Policy	EHS	Upstream and own operations	Internal

2.4.4 Key Products and Materials

The Group develops eyecare and eyewear solutions that meet the world's growing vision care demands and changing consumer lifestyles. EssilorLuxottica's key products are the following:

- Eyewear: Optical and sun frames of both house and licensed brands. From an R&D perspective, every frame is the result of an ongoing process that anticipates and interprets the needs, desires and aspirations of consumers, while embracing a commitment to eco-design and exiting fossil dependence. The three main technologies are acetate, injected plastic and metal, which in 2025 accounted respectively for 26%, 47% and 27% of frames. To pursue the goal of switching from fossil to bio-based and/or recycled sources in line with its sustainability commitment, EssilorLuxottica has been introducing bio-based and recycled materials, including those coming from internal recycling opportunities.

  In 2025, the Group further expanded the permeation of responsible materials (bio-based and/or recycled materials) in its eyewear collections and, as a result, 36% of active assortment is made with responsible materials for frames, plano and demo lenses. Considering only collections launched in 2025, such permeation goes up to 52%.
- Lenses: EssilorLuxottica produces prescription (finished and semi-finished) or plano lenses. In general, finished lenses are produced for simple eyesight corrections such as myopia, hyperopia and some astigmatisms. Semi-finished lenses are intended for more complex corrections including presbyopia, while plano lenses without corrective power are typically used for sunglasses. The circularity approach is different for plano lenses and prescription lenses:
  - Plano lenses: plastic and mineral lenses for sunglasses application. The circularity approach focuses on introducing bio-based and/or recycled materials. Responsible materials for lenses include bio-based nylon and bio-circular polycarbonate,
  - Prescription lenses: as a medical device, the inclusion of bio-based and/or recycled materials requires significant developments. For this reason, as of now, the circularity focus is on the production process, specifically on waste reduction initiatives.
- Eyeglass cases and accessories: the 2022 acquisition of Giorgio Fedon & Figli S.p.A. marked a key step in advancing the Group's sustainability goals. In 2025, Fedon reinforced its strategy under the Eyes on the Planet program, adopting a circular approach across the product lifecycle; covering resource use, process impact and innovative design. The focus includes bio-based and recycled materials, reduced weight and volume and limiting single-use plastics; minimizing production impact through renewable energy, efficiency and waste valorization; and enhancing circularity with mono-material, easy-to-disassemble designs. Leveraging Fedon's commitment and engaging packaging suppliers, in 2025 EssilorLuxottica promoted its Sustainable Packaging Policy setting more stringent requirements to assess packaging developments. In 2025, 44%[1] of new core collection packaging kits launched follow the new criteria.
- Smart eyewear and wearables: over the years, the Group has strengthened its R&D, manufacturing and distribution capabilities in the wearables category, leveraging collaborations with leading technology pioneers to explore new ways of integrating technology, fashion and lifestyle. This emerging category is currently undergoing a comprehensive mapping and assessment phase. The aim is to understand how to best leverage and capitalize on existing sustainability initiatives (for example, those related to alternative materials for frames, sun lenses and packaging, as well as process and technology innovations in prescription lens manufacturing) and study new specific initiatives for this category. In addition, EssilorLuxottica is actively working with its partners and key suppliers to ensure responsible sourcing and development of electronic components.

EssilorLuxottica considers the quality and durability of its products an essential value for the success of the Company. For prescription lenses, the average wearing period is two years, covered by a legal warranty. However, it should be noted that, as medical devices, the durability of prescription lenses is closely tied to the evolution of the prescription, which is the primary driver for product replacement. As for eyewear, the average wearing period is also two years, covered by a legal warranty. That said, the lifespan of a frame can often be much longer, and EssilorLuxottica implements several initiatives to extend the life of its products. These initiatives include:

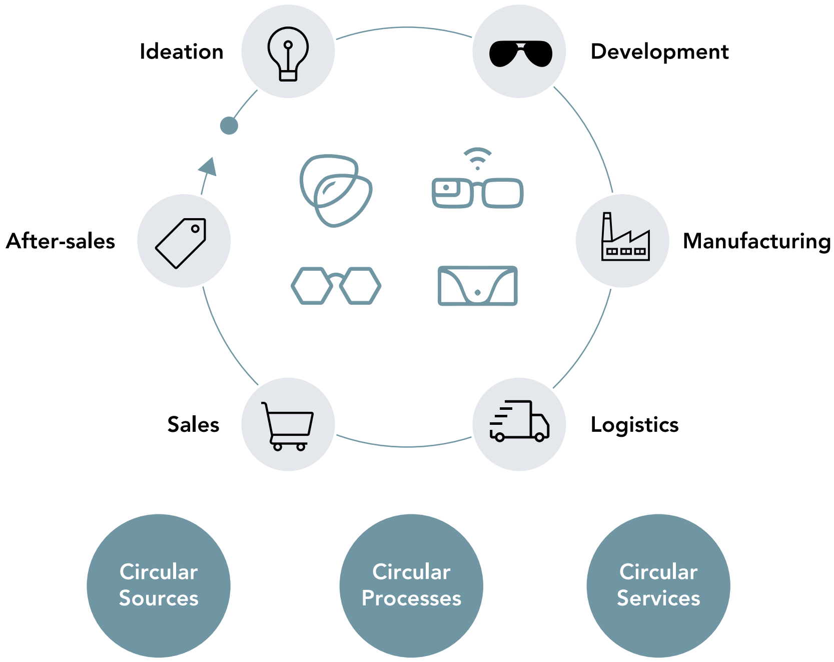
a. providing consumers with guidelines on how to properly wear, clean and protect their glasses;
b. offering spare parts for at least three years after product discontinuation, allowing for the replacement of key components (e.g., screws, end tips, nose pads);
c. providing repair and renewal services as outlined above.

For more information regarding the Group's products, please refer to Chapter 1 of the 2025 Universal Registration Document.

(1) *A direct comparison between the 2025 and 2024 data is not appropriate, as the assessment framework has changed. Under the previous criteria, the percentage would have increased; however, the introduction of more stringent and mandatory requirements – such as FSC certification, PVC exclusion and minimum content of alternative materials – has resulted in a different reported figure.*

2.4.5 Actions and Resources

From product and design innovation to reimagining the consumer experience and establishing new business models, EssilorLuxottica teams constantly question how the Company can better serve its consumers. The activities span from researching and sourcing new materials to shifting from fossil to bio-based and/or recycled materials across several product categories, with a special focus on limiting single-use plastic. Additional efforts are also made on the application of eco-design principles, internal recycling capabilities and implementation of circular services to extend product life or give products a second life.



Materials

Materials for eyewear, plano and demo lenses application

Since 2019, bio-based and recycled materials have been introduced into EssilorLuxottica's portfolio of plastic raw materials for eyewear frames and lenses applications.

Ever since, the Group has been increasing their permeation, which represented 33% of total sourced materials for frames and lenses in 2025 (29% in 2024). Examples include the increase of demo lenses having a recycled content (Recycled Polymethyl Methacrylate – RPMMA) of over 80% and the introduction of Everflex, a new flexible material compliant with toy safety regulations and ideally suited for kids' eyewear; it is made with a combination of two polymers having 46% and 93% bio-carbon content respectively, reflecting the Group's commitment to responsible innovation.

Since 2024, the Company has worked with suppliers of precious-metal-based solutions, used for plating, and with suppliers of plated-metal components to ensure that all precious metals come from recycled and certified sources. In 2025, engaged suppliers based in Italy and China accounted for 74% of total spending on raw precious metals, in line with the previous year, and 100% on plated-metal components. Additionally, the Company is working with non-precious metal suppliers, asking them to transparently declare and attest recycled content inside different metal alloys, according to ISO 14021, aiming at continuous monitoring and improvement of recycled content over time.

Materials for packaging application

In line with the internal sustainability packaging policy, a focus has been placed on the recycled version of paper and synthetic fabrics. Focusing on these materials, Fedon's plants in Shenzhen (China) and Alpago (Italy) are certified according to Global Recycled Standard (GRS) certification for fabrics and Forest Stewardship Council (FSC) certification for paper. These certifications underscore Fedon's commitment to responsible sourcing and manufacturing, allowing the brand to offer certified accessories that uphold high social and environmental standards, as well as trace and attest recycled content inside its products.

Materials for Point of Purchase application

In 2025, the Company continued to work with a strong focus on Point of Purchase (POP) materials used in stores to showcase products and enhance the consumer purchasing experience. These include, for example, countertop displays and shelving units, promotional signage, seasonal cardboard stands, floor-standing totems and branded decor elements for in-store corners. The assessment covered both permanent and seasonal tools for the wholesale channel, as well as permanent tools for retail, accounting for more than 1.2 million units per year, representing around 93% of all units managed.

Following the introduction of the POP sustainability policy applied to all new tools, the use of PVC has been brought down to almost zero, and certified paper continues to account for the vast majority of seasonal items. Work on increasing the use of recycled materials remains ongoing, along with efforts to ensure tools are monomaterial or easy to disassemble.

Single-Use Plastic

With reference to Single-Use Plastic (SUP), the Group is constantly playing its part to limit the amount of plastic designed and conceived to be used only once for a specific purpose.

In 2024, EssilorLuxottica established a dedicated taskforce to define a clear methodology for identifying and reducing SUP items. The approach is based on a comprehensive definition aligned with current and anticipated regulations: plastic items designed for one-time use and lacking durability for repurposing. The annual assessment process involves all key functions, including Sourcing, Supply Chain, EHS and Logistics, ensuring a consistent and collaborative effort.

The Company categorizes SUP items into the following streams:

- B2C – Packaging and other products that constitute a sales unit designed or conceived for the final user or consumer at the point of retail;
- B2B – Packaging for materials, components and partially manufactured or finished goods, as well as other products intended for distribution and handling between manufacturers and/or other intermediaries.

On World Oceans Day 2025, EssilorLuxottica officially disclosed its target (see 2.4.6 *Targets and Metrics*) to significantly reduce single-use plastic packaging worldwide by 2030, excluding medical devices and products for which the Company acts solely as a trader. To achieve these targets, the Group is implementing concrete measures, including the replacement of plastic components (e.g., protective temple sleeves, cleaning cloth envelope) in eyewear packaging with paper-based solutions and the removal of plastic sun-lens marketing stickers. Similar initiatives were extended to other product categories such as lenses, AFA and instruments, and to logistics packaging, with a broader adoption of paper-based materials including paper void fill and paper tape.

Application of circular design

The adoption of eco-design principles and Life Cycle Assessments (LCAs) are part of the Company's wider vision of how to integrate sustainability into business and operational practices. In 2021, the Group first launched a proprietary eco-design tool, Sustainability Assessment Methodology (SAM), for its lens division, followed in 2024 by a new proprietary tool (SAM2.0), for prescription lenses and eyewear, to strengthen the quantitative assessment of environmental and social impact aligned with the Product Environmental Footprint (PEF) methodology. Starting in 2025, EssilorLuxottica has been systematically assessing the environmental impact of all innovations launched on the market within its business areas: prescription lenses and eyewear. In addition, the Company has implemented a specific policy for eyewear packaging design, aimed at reducing material usage, improving recyclability and eliminating single-use plastics, in line with its broader sustainability strategy.

Over the years, EssilorLuxottica has consistently invested in building internal capabilities in Life Cycle Assessment (LCA), grounded in ISO 14040/14044 standards. By autonomously modeling products and activities, the Company has enhanced its understanding of the environmental impacts across its vertically integrated business model. This approach aims to identify key improvement areas (hotspots) and to inform internal decision-making with a clear sustainability perspective. As part of these efforts, EssilorLuxottica has also developed an innovative simulation tool for CO_2 emissions calculation to support supply-chain optimization.

This Life Cycle Assessment expertise is further leveraged to strengthen supplier engagement, both by supporting the measurement of impacts associated with new materials and by fostering constructive dialogue with suppliers to help them better understand their own environmental footprints and jointly identify opportunities for improvement.

In selected cases, LCA outcomes validated by third parties have been used to support publications associated with new product launches. For example, analyses conducted for the launch of Varilux® Physio® extensee™ demonstrated a 19% reduction in plastic use and a 6% reduction in CO_2 emissions compared to the previous version, thanks to new semi-finished lenses, optimized in-lab processes and paper packaging.

Circular business practices

Circular processes

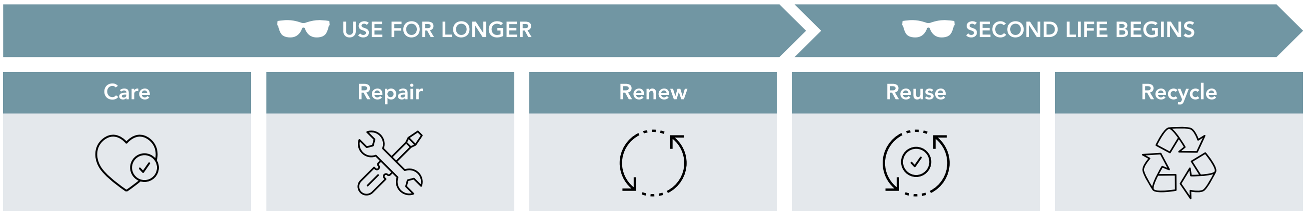
The Company continues carrying on projects to valorize its internal material waste. The Tristar plant in China and Agordo plant in Italy have been recycling nylon plastic scraps (since 2023 and 2022 respectively) derived from the injection manufacturing of frames into black raw nylon. Also in 2025, the Campinas plant in Brazil entirely internalized the process. All plants involved in the process achieved the International Sustainability & Carbon Certification (ISCC) Plus for the Circular Economy covering 2025-2026.

The third-party certification ensures, through the mass balance approach[1], the traceability of the material throughout all production phases: from waste collection to injection molding. The recycled granule maintains the high standards of quality and performance of the original and this makes it suitable to be injected again to produce new frames or for other circular initiatives. In 2025, together the plants recycled over 95 tons of nylon, in line with the previous year.

Since 2024, the Group enabled new opportunities for the use of the above-mentioned nylon waste accurately sorted and collected in the Agordo plant. It is transformed by an external partner and used to create plastic displays for in-store purposes. Since last year, when the project started, almost 8 tons of nylon scraps have been recycled, producing more than 40,900 displays that have been distributed across EssilorLuxottica's stores in EMEA, both mono-brand (Ray-Ban stores and Oakley stores) and retail (Sunglass Hut, Solaris, Salmoiraghi & Viganò and GrandVision). This initiative is part of a broader in-store sustainability roadmap that includes major investments in its brick-and-mortar activities related to energy efficiency, building less and better, responsible use of construction materials and waste management.

Circular Services

EssilorLuxottica also applies circularity principles by engaging and involving its consumers in different phases of the product lifecycle through two different levers: use for longer and second-life activation.



Use for longer

To use products for longer, the Group is focusing its efforts to:

- provide guidelines on how to properly wear, protect and clean glasses to ensure their maintenance;
- offer in-store repair and renewal services, through frame adjustment and fitting or replacement of spare parts; in this regard, wholesale customers and final consumers can order original spare parts to replace damaged ones.

In this context, EssilorLuxottica has been testing various initiatives to then expand them to a larger scale.

Indeed, between June and October 2023, Ray-Ban launched a brand specific initiative, the "Repair & Care Hub". This in-store available service encouraged customers to take care of their eyewear products by entrusting them to repair experts. It started as a pop-up that became permanent in 2024, totaling 12 stores in EMEA and 2 in the US as of 2025.

In 2025, a new station was designed by Nextore, a Group division dedicated to Construction, Design and Fleet services, owned by EssilorLuxottica, to enhance the visibility of both the service and its features. For the first time, a polishing machine was integrated into the setup, offering customers a premium, more comprehensive repair experience. Overall, more than 10,700 customers benefited from the Ray-Ban Repair & Care service in 2025 (3,850 in 2024).

Similarly, in April 2024, Salmoiraghi & Viganò launched "Officina Rinnovo" (Renovation workshop). This model area was designed to test the Repair & Renewal Service under a multi-brand banner for the first time and led to Salmoiraghi & Viganò winning at the 2024 Retail Awards in the Best ESG & Sustainability Project category. First piloted in two stores in Milan, for three weeks in each store, at the beginning Officina Rinnovo featured the presence of technicians from EssilorLuxottica plants. In 2025, a new phase started, with dedicated training provided to store staff at the EssilorLuxottica plant in Sedico.

Lastly, in 2025, Persol also committed to integrating care into its brand strategy. This was achieved through a dedicated landing page aimed at educating consumers on proper frame care and wear. Additionally, the brand introduced Persol Care Week, a unique opportunity for customers to meet Persol artisans and receive personalized restoration treatments. The initiative was offered for one week at the Milan store, with plans to expand the project to other Persol stores in the coming year.

(1) *Mass balance is an accounting approach that tracks and allocates recycled inputs through the production process, ensuring that claimed content does not exceed the input.*

Second life begins

This lever consists in collecting post-consumer products in store to reuse or recycle the materials they are made of. Since April 2023, the Company has been offering consumers the opportunity to bring unused sunglasses and prescription glasses of any brand back to the store, free of charge. EssilorLuxottica takes responsibility for the recovery of materials or donates them for educational purposes in the optometry field.

Starting this year, the donation stream involved 29 Italian optical schools, one optical school in Sweden and another one in Denmark. This service is available in all Salmoiraghi & Viganò and GrandVision stores in Italy. In 2025, the service was expanded to other optical banners across EMEA, including GrandOptical in France, Pearle in the Netherlands and Belgium, and 37,500 frames have been collected from stores and sorted in Sedico. For the first time, the service was also introduced in EssilorLuxottica's sun banners in Italy, specifically in Solaris and Ray-Ban stores.

Among EMEA optical banners providing the 'Vision as a Service' spectacle subscription model, Synoptik was a forerunner, launching the program in Denmark and Sweden in 2019. To maximize the product lifetime of returned spectacles from this service, the banner launched the PreLoved concept in 2022 whereby spectacles are sold second-hand. Additionally, from November 2024, returned spectacles that are not sellable under PreLoved are either used for educational purposes at optometry schools or disassembled into plastic, metal and glass components.

To manage eyewear end-of-life at scale, the Company built a dedicated area inside the plant in Rovereto (Italy) to properly disassemble eyewear frames, identify materials and recycle them. This investment is the result of two years of research of innovative technologies to be able to manage the variety in terms of types of materials and product shapes.

In 2025, the plant obtained the required environmental authorizations for waste management and transformation and pilot tests have begun, marking a key step forward in integrating end-of-life processes for eyewear products and further strengthening the Company's knowledge and expertise in this field.

Collaborations

EssilorLuxottica internal experts are also engaging with an entire ecosystem of companies, start-ups, think-tanks and academic institutions to build innovative solutions that require collaborative actions. For example, in 2021, EssilorLuxottica, along with other multinationals, jointly launched the first international research chair devoted to the circular economy at ESSEC Business School, known as the "Global Circular Economy Chair", aimed at training future circular economy leaders and accelerating the transition toward a circular economy.

In addition, EssilorLuxottica has partnered with different players in industry to further develop responsible materials while maintaining the exact same performance as traditional ones. Thanks to the collaboration agreement signed in 2021 with Mazzucchelli 1849, the Group has further boosted the development of alternative types of acetate, with the aim of increasing sustainable features of bio-based and recycled acetate. Different innovation levers have also been activated, aimed at reducing the environmental impact of Mazzucchelli's plants and processes, in terms of energy efficiency and waste reduction through internal scraps recovery and valorization; additional efforts have been made to improve materials performances, testing new acetate formulations to offer more responsible eyewear products while maintaining high quality and performance.

Furthermore, the R&D and Engineering teams continuously seek to diversify their supply sources for secondary or innovative raw materials by collaborating with multiple industries. This approach helps reduce reliance on virgin or fossil-based materials. Several projects are currently underway with suppliers. For instance, EssilorLuxottica has partnered with Bureo to launch the Costa Del Mar Untangled collection, featuring frames made from recycled fishing nets. Discarded nets are collected from commercial fishing ports in South America and transformed by Bureo into raw material pellets. EssilorLuxottica then uses these recycled pellets to produce frames.

Waste

Waste management is a crucial pillar of EssilorLuxottica's commitment to reducing its environmental footprint. It encompasses several initiatives to effectively reduce waste generation from industrial operations and contribute to a more circular economy. These include reducing raw material loss, implementing policies to recover, reuse and recycle residual parts and scraps during production activities and processes, managing discarded consumables, and minimising packaging and chemical waste throughout production processes.

The Company completed a waste generation analysis of its main manufacturing plants, distribution centers and laboratories to determine the type and weight of waste generated and improve the identification of waste management solutions with a focus on the potential for material recycling and energy recovery. It is updated annually and was extended to new plants in 2025 (covering in total 58 sites representing nearly half of Rx lenses and more than 60% of mass production lens volumes as well as frame manufacturing plants). This approach will be rolled out to more plants in 2026.

The table below reports the main types of waste at EssilorLuxottica (including lenses, frames and non-manufacturing activities). These types of waste are treated mostly by third-party waste service suppliers.

Waste type	%	Description	Main waste treatment
Liquid waste	33%	Mostly wastewater, solvent, acid and base from manufacturing processes	Physico-chemical treatments
Plastic	28%	Mostly scrap lenses, process residues, packaging and plastic films	Energy recovery or recycling
Others	26%	Mostly general industrial waste, absorbents, filter materials, drums, sludge and personal protective equipment	All treatment types align with the Group's Policies
Cardboard	11%	Mostly consumable packaging and semi-finished packaging	Recycling
Metal	2%	Mostly process losses and alloys	Recycling

The Group focuses on new industrial solutions to reduce in-house scraps to limit waste and the use of plastic as much as possible. Waste reduction is largely achieved through the improvement of manufacturing yields, mainly reducing the waste intensity of the manufacturing and Operations processes (quality management, continuous improvement, eco-design, production process optimization and reuse opportunities). Examples are listed below:

- The Slim Fit project for lens production aims to decrease input material that, consequently, reduces waste generation during the lens production process. To achieve this goal, the design for standard raw blank lenses has been optimized to obtain the same final high-quality lens. The roll-out of the Slim Fit project in the Group's biggest Rx labs around the world has accelerated, avoiding more than 2,100 tons of waste in 2025;
- Continuous process optimization has led the Company to scale compacting processes for the surfacing residues of all substrates. This reduces the weight and volume of waste by nearly 50% (less picking rotation, with an impact on CO_2e), and recycles water. Water is then filtered and reinjected into the prescription laboratory's in-house system, following a circular approach. Three new equipment items were added in 2025 decreasing the waste intensity for each site by 18% on average;
- Additional waste management initiatives are also ongoing with partners like Mazzucchelli, and several recycling initiatives are taking place locally, including one in Mexico, contributing to the economic development of local communities. Indeed, in 2025, the SOFI plant sent 53 tons of waste, mostly made of plastics (production consumables), to a small recycling company employing local communities. They turn that waste into ready-to-use raw materials, sold to other companies in the country, producing final items like sandals, crates or insulating materials. Part of the revenue supports the activity of the Index association, which helps local workers and their families with educational and health programs (access to medicine, kindergarten, dental care, etc.);
- Specifically concerning plastic recycling, the Company has been investigating different options to recycle the swarf resulting from the surfacing of Rx lenses. Some studies are ongoing with third parties and the University Research Center to identify a solid process for recycling, to allow more options for circular applications. On this topic, important steps have been taken in 2025 to identify a scalable and reliable process to recycle plastic swarf into applications requiring good mechanical performance.
- New applications related to wet waste have been implemented. In 2025, in China, the implementation of a mud dryer saved around 450 tons of waste, with a low energy-consuming approach;
- In France, in the EssilorLuxottica Excellence Laboratory, chip compaction contributes to a 46% reduction in waste, while more than 95% of waste is reused;
- The Company is continuously encouraging initiatives at local level, allowing bottom-up processes to collect best practices from every region, for example a food digestor implemented in Thailand (ELTL), reducing waste by 70 tons. This initiative is gin the process of being endorsed for deployment in 2026 as a new standard for the largest sites with significant food waste streams;
- In 2022, EssilorLuxottica launched its first waste expertise training session, for employees who contribute to reducing the Group's waste footprint. Following this successful pilot, waste training was deployed in North America for all relevant activities. A Waste & Circularity category in the Group's internal 'Operation Best Practices Portal' was created in 2024 and deployed in 2025;
- In 2025, following the two new waste-related policies, two online training courses were released on the Leonardo platform and cascaded in all regions.

EssilorLuxottica's manufacturing flexibility and improved demand forecasting capabilities are also key to reducing waste in its plants. Over the years, its retro-planning approach for the creation and launch of each eyewear collection has allowed better planning of production volumes.

In more recent years, the Company has also invested in the continuous improvement of manufacturing processes to further reduce its environmental impact, for instance the installation of evaporator systems and wastewater treatment systems, as presented in Section 2.3 *ESRS E3 – Water and Marine Resources*.

Another major initiative largely adopted, specifically in North America, is plastic waste valorization with energy recovery, then with use of the downstream product as a raw material for the cement industry, thereby closing the loop and recycling the resulting outcome in a circular way, turning it into a new product.

2.4.6 Targets and Metrics

The Company's goal of "Shifting from fossil-based materials to bio-based and/or recycled materials" is global and mostly pertains to the upstream part of the Company's value chain related to sourcing alternative materials and to operations for the recycling of industrial scraps. From a category standpoint, this target refers to the eyewear and plano lenses category, where it is possible to introduce bio-based and/or recycled materials while still guaranteeing the same excellence and quality as well as the best vision experience.

With regard to prescription lenses, as they are medical devices, it is quite challenging to include bio-based and/or recycled materials. For this reason, for prescription lenses, the circularity focus is on the production process. In 2025, the Group has been increasing the permeation of alternative materials, which represented 33% of total sourced materials for frames and lenses in 2025 (29% in 2024). More specifically, 27% of bio-materials and 6% of recycled materials were sourced in the plastic category of materials for frames and plano and demo lenses.

With the ambition of incorporating eco-design into innovation processes, in 2025 EssilorLuxottica carried out quantitative sustainability assessments for all new lens product innovations brought to market, as well as for all new materials introduced in the frame segment. This represents an important milestone as part of a circular improvement framework aimed at quantifying impacts and identifying potential levers to increase circularity across materials, processes and the value chain, as well as exploring new areas for progress. Among these areas of progress, assessing the impacts of materials used in its products from the ideation stage allows the Group to guide its choices toward more responsible materials.

In 2025, the Company officially committed to reducing single-use plastic packaging by 60% in its B2C and virgin single-use plastic packaging by 30% in its B2B streams by 2030 (considering the 2023 assessment as a baseline).

To support the achievement of these targets, the Group adopted a structured approach focused on the elimination of single-use plastics and the systematic substitution of such materials with reusable, non-plastic or recycled alternatives.

In 2025, the Company achieved a 7% reduction in the B2C stream compared to the baseline, following the implementation of significant and ongoing packaging optimization and redesign for eyewear and AFA products. These initiatives focused on the replacement of plastic components with paper-based alternatives and, where feasible, on the rationalization or elimination of selected packaging elements.

Over the same period, a 12% reduction was recorded in the B2B stream, primarily through the optimization of transportation and industrial packaging for both eyewear and lenses. Actions included the development and testing of paper-based packaging solutions, alongside an increased use of recycled plastic where plastic materials remained necessary.

Regarding waste, EssilorLuxottica has quantified a waste valorization target, calculated as the proportion of waste that is being sent to waste service suppliers for their final treatment, either for energy recovery or material recycling streams. This objective encourages local entities to search for new treatment methods but also decreases the quantity of waste being sent to non-valorization streams, including landfill or incineration without energy recovery. The target is to increase the waste valorization rate by 10 points in the next five years compared to 2024. The increase in the valorization rate helps to reduce the use of fossil resources, when waste is used as an alternative combustible to fuel or gas (e.g., swarf sent to cement factories) or recycled (e.g., polycarbonate lens scrap in mass production).

The table below shows the Company's waste generation in 2025 and the evolution compared with 2024.

Waste

	2025	2024
TOTAL WASTE GENERATED	133,122	142,160
TOTAL AMOUNT OF HAZARDOUS WASTE	**39,853**	**47,284**
Hazardous waste diverted from disposal	**16,697**	**16,851**
Hazardous waste diverted from disposal due to preparation for reuse	-	-
Hazardous waste diverted from disposal due to recycling	10,793	11,469
Hazardous waste diverted from disposal due to other recovery operations	5,904	5,381
Hazardous waste directed to disposal	**23,156**	**30,433**
Hazardous waste directed to disposal by incineration	3,238	3,601
Hazardous waste directed to disposal by landfilling	19,918	26,833
Hazardous waste directed to disposal by other disposal operations	**-**	**-**
TOTAL AMOUNT OF RADIOACTIVE WASTE	**-**	**-**
TOTAL AMOUNT OF NON-HAZARDOUS WASTE	**93,269**	**94,876**
Non-hazardous waste diverted from disposal	**71,918**	**72,444**
Non-hazardous waste diverted from disposal due to preparation for reuse	-	-
Non-hazardous waste diverted from disposal due to recycling	41,112	45,928
Non-hazardous waste diverted from disposal due to other recovery operations	30,806	26,516
Non-hazardous waste directed to disposal	**21,350**	**22,432**
Non-hazardous waste directed to disposal by incineration	2,325	2,628
Non-hazardous waste directed to disposal by landfilling	19,025	19,804
Non-hazardous waste directed to disposal by other disposal operations	**-**	**-**
WASTE VALORIZED	88,616	89,295
Waste valorization rate	67%	63%
NON-RECYCLED WASTE	81,216	84,762
Non-recycled waste rate	61%	60%

In 2025, the total waste generated by the Group decreased significantly compared to the previous year, driven by a remarkable 16% reduction in hazardous waste. In fact, the Company continued to focus its efforts on the reduction of Hazardous Waste, limiting its generation across different Operations processes through efficiency measures and improved waste management practices. Moreover, in line with the above-mentioned target, the Group registered a relevant increase of 4 percentage points on its valorization rate, reaching 67% in 2025 compared with 63% in 2024. For additional information on the methodology used for data collection and estimation, please refer to the Methodology Note in Section 6 *Methodology Note*.

The table below shows the Company's progress on other circularity metrics in 2025:

Other metrics	Progress
Rate of recyclable content in products	25%
Rate of recyclable content in product packaging	A packaging recyclability assessment will be carried out in due course with a methodology aligned with the European Union Packaging and Packaging Waste Regulation (PPWR), which sets European standards on this matter.

2.5 EU Taxonomy Disclosure

Context of the EU Taxonomy

The EU Taxonomy Regulation supports the European Green Deal by providing a unified framework to classify environmentally sustainable economic activities. Published on June 22, 2020 in the Official Journal of the European Union and entering into force on July 12, 2020, Regulation (EU) 2020/852 – the EU Taxonomy Regulation (hereinafter also referred to as the "Taxonomy" or "Regulation") and other Delegated Acts provide a classification system for defining economic activities that can be considered environmentally sustainable, to support investment flows in a more sustainable economy.

The Regulation defines turnover, capital expenditure (CapEx) and operating expenditure (OpEx) associated with the Taxonomy-eligible and Taxonomy-aligned activities such as the Taxonomy KPIs that must be reported on.

On July 4, 2025, the European Commission adopted Commission Delegated Regulation (EU) 2026/73, introducing simplifications to the EU Taxonomy reporting framework, namely the introduction of a materiality threshold (allowing exclusion from the publication of activities below 10% of turnover, CapEx or OpEx), streamlined reporting templates and adjustments to certain 'Do No Significant Harm' (DNSH) criteria. These updates were formally published in January 2026 following the end of the scrutiny period. EssilorLuxottica has applied the simplified framework in its 2025 reporting, including the updated disclosure tables.

According to the Regulation, to be eligible and qualify as a potentially sustainable activity, an economic activity needs to be listed in the Delegated Acts of the Regulation and contribute to at least one of the six environmental objectives defined in Article 9:

- climate change mitigation;
- climate change adaptation;
- the sustainable use and protection of water and marine resources;
- the transition to a circular economy;
- prevention and reduction of pollution; and
- the protection and restoration of biodiversity and ecosystems.

To ascertain if an eligible activity is Taxonomy-aligned, it must meet the following technical screening criteria:

- substantial contribution: the activity must contribute substantially to one or more of the environmental objectives;
- Do No Significant Harm (DNSH): it must not cause significant harm to the remaining five environmental objectives;
- Minimum Safeguards (MS): it must respect international standards on Human Rights, anti-corruption, taxation and fair competition.

Following the official adoption of Article 3 of the Regulation (Criteria for sustainable economic activities), EssilorLuxottica assessed the eligibility and alignment of its activities against the six environmental objectives (included in Climate Delegated Act – Annex I and Annex II, Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486): climate change mitigation, climate change adaptation, the sustainable use and protection of water and marine resources, the transition to a circular economy, prevention and reduction of pollution, and the protection and restoration of biodiversity and ecosystems.

It is worth remembering that the European Commission has prioritized the establishment of technical screening criteria for economic activities with the highest potential contribution to environmental objectives.

EU Taxonomy disclosure is an integral part of EssilorLuxottica's CSRD reporting, which adopts the European Sustainability Reporting Standards. EU Taxonomy requirements are integrated within the CSRD framework to ensure consistency. Following the simplification introduced by Commission Delegated Regulation (EU) 2026/73, certain Group activities fall below the 10% materiality threshold under the EU Taxonomy and are therefore not considered material for Taxonomy reporting purposes. These activities nonetheless form part of the Company's transition plan and continue to be implemented and monitored. In addition, the Group has undertaken other initiatives under its transition plan – such as energy-saving measures – that are currently considered non-eligible under the EU Taxonomy, as they are not covered by the existing version of the Regulation. Consequently, in accordance with the Taxonomy simplification measures applicable for the reporting period, no explicit reference between the EU Taxonomy-aligned CapEx and the transition plan is disclosed under ESRS E1-3.

EssilorLuxottica's Analysis

The analysis was performed across all six environmental objectives, namely: climate change mitigation, climate change adaptation, the sustainable use and protection of water and marine resources, the transition to a circular economy, prevention and reduction of pollution, and the protection and restoration of biodiversity and ecosystems.

Given its vertically integrated business model covering the design, manufacture and distribution of ophthalmic lenses, frames and sunglasses (see Section 1.3 *Strategy*), EssilorLuxottica's core economic activities are not described in the current version of the Regulation and are therefore not considered "eligible" nor aligned. Consequently, as in 2024, the Group did not generate significant Taxonomy-eligible or Taxonomy-aligned turnover in 2025.

Nevertheless, as an industry leader committed to sustainability, in 2021 EssilorLuxottica launched Eyes on the Planet, an integrated and far-sighted sustainability program, which includes its commitments on climate change (see Section 2.1 *ESRS E1 – Climate Change*) and circular economy (see Section 2.4 *ESRS E5 – Resource Use and Circular Economy*).

To deploy and achieve its sustainability commitments, the Company has launched several initiatives and projects that, when assessed individually, qualify as Taxonomy-eligible investments (CapEx) (e.g., photovoltaics, building components, mechanical and electrical equipment like HVAC systems, energy efficient lighting, charging stations, green vehicles or Acquisition and ownership of buildings). Each project is evaluated against the activities and related technical screening criteria listed in the Climate Delegated Act – Annex I and Annex II.

Disclosure of Taxonomy KPIs

Turnover KPI

In 2025, as in 2024, EssilorLuxottica did not generate any significant turnover that could be considered Taxonomy-eligible or Taxonomy-aligned. For this reason, the indicator is considered not material for 2025, as was also the case in 2024, and no detailed Taxonomy Turnover table is disclosed. The Group turnover equals €28,491 million (€26,508 million for 2024), as presented in the line item Revenue of the consolidated statement of profit or loss (Chapter 5, Section 5.1.1 *Consolidated Statement of Profit or Loss* of the 2025 Universal Registration Document). EU Taxonomy-eligible turnover represents less than 10% of total turnover, corresponds to non-core activities and is considered non-material.

OpEx KPI

Based on the assessment of the denominator, the analysis confirmed that the Group's business model did not generate significant OpEx within the categories defined by the Regulation. Operating expenses under the EU Taxonomy definition (denominator) represent less than 10% of the Group's total consolidated operating expenses, which include Cost of Sales and Total Operating Expenses as presented in the 2025 consolidated financial statements (Chapter 5, Section 5.1 *Consolidated Financial Statements of* the 2025 Universal Registration Document). For this reason, the indicator was considered not material for 2025, as was also the case in 2024, and no detailed Taxonomy OpEx table is disclosed.

CapEx KPI

Since the list of eligible economic activities provided by the Regulation does not cover the Group's core business, its CapEx cannot be associated with eligible economic activities generating turnover. However, based on the Delegated Act – Annex I Article 8, § 1.1.2.2, point (c), related to the purchase of output or individual measures from Taxonomy-aligned economic activities with the aim of reducing greenhouse emissions, the Group identified the following eligible activities that can be considered individually as Taxonomy-eligible investments:

- transport by motorbikes, passenger cars and light commercial vehicles (Activity 6.5);
- construction of new buildings (Activity 7.1);
- renovation of existing buildings (Activity 7.2 and Activity 3.2);
- installation, maintenance and repair of energy efficiency equipment (Activity 7.3);
- installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings) (Activity 7.4);
- installation, maintenance and repair of instruments and devices for measuring, regulating and controlling energy performance of buildings (Activity 7.5);
- installation, maintenance and repair of renewable energy technologies (Activity 7.6);
- acquisition and ownership of buildings (Activity 7.7).

CapEx related to the above activities is reported under the lines Additions and Business Combinations of the items Properties, Plant & Equipment (Activity 7.1, 7.2/3.2, 7.3, 7.4, 7.5, 7.6 and owned buildings of 7.7) and Right-of-Use Assets (Activity 6.5 and rented buildings of 7.7) as presented in the 2025 consolidated financial statements (Chapter 5, Section 5.1.6 *Notes to the Consolidated Financial Statements* of the 2025 Universal Registration Document).

These activities form part of the Group's sustainable initiatives across the production sites, laboratories and stores. The analysis of costs associated with Group properties is based on accounting records used for the preparation of EssilorLuxottica consolidated financial statements/information. For directly managed stores, data was assessed on a full scope. For production sites and laboratories, the analysis was performed in 2025 on a full scope for frames sites and lens facilities.

Following the application of the materiality threshold by Commission Delegated Regulation (EU) 2026/73, only CapEx related to activity 7.7 Acquisition and ownership of buildings was assessed as material for the Group and therefore disclosed. All other Taxonomy-eligible activities fell below the materiality threshold and were considered non-material for reporting purposes.

Total CapEx reported in the consolidated financial statement is €2,803 million (Chapter 5 of the 2025 Universal Registration Document, Section 5.1.6 *Notes to the Consolidated Financial Statements*, Note 10 *Goodwill and Intangible Assets*, Note 11 *Property, Plant and Equipment*, and Note 12 *Leases;* Additions and Business combinations excluding goodwill). After applying the 10% materiality threshold introduced by Commission Delegated Regulation (EU) 2026/73, the analysis of the CapEx KPI resulted in 36.26% (2024: 38.29%) of eligibility and 0.47% (2024: 0.73%) of alignment. 2025 assessment relates exclusively to activity 7.7 Acquisition and ownership of buildings, which was the only activity considered material for the Group during the reporting period, following the application of the materiality threshold. 2024 data is therefore not fully comparable, as it was prepared under the previous Taxonomy methodology.

Most of the eligible and aligned CapEx derives from the inclusion of costs related to the Right of Use of stores and other buildings.

Below are the steps carried out to assess alignment with the EU Taxonomy, starting from compliance with Minimum Safeguards.

Compliance with the Minimum Safeguards

Compliance with EU Taxonomy minimum safeguards is based on Article 18 of the Regulation, and on the recommendations set out in the Final Report on Minimum Safeguards published by the EU Platform on Sustainable Finance (October 2022). The report identifies four core areas for assessment: Human Rights, corruption, taxation and fair competition.

To assess the alignment of its eligible CapEx, the Group must verify that minimum safeguards are respected for each CapEx-related activity and, therefore, that the supplier engaged by the Group complies with the minimum safeguards described in Article 18. For consistency, EssilorLuxottica is also required to comply with minimum safeguards for its own operations.

In fact, ethical behavior is a foundation principle of the Company. The Code of Ethics and the Business Partners' Code of Conduct define the principles that apply to all EssilorLuxottica employees, contractors, vendors and suppliers, and represent a minimum set of standards that cannot be compromised, including the respect of Human Rights, labor conditions and fair competition. EssilorLuxottica's suppliers are required to comply with these documents. The Group maintains a strong vigilance framework on human rights throughout its value chain, supported by a proactive approach consistent with French Law no. 2017-399 (*Devoir de Vigilance*), which mandates supply-chain due diligence to identify and manage human-rights risks (Section 3.2 *ESRS S2 – Workers in the Value Chain*).

In line with its Code of Ethics and the Business Partners' Code of Conduct and applicable international and local regulations, such as the Duty of Care and Sapin II Laws in France, the Group has established a global Anti-Bribery and Corruption program (see Section 4.1 *ESRS G1 – Business Conduct*).

The Tax function is responsible for monitoring and ensuring that the Group meets all minimum requirements related to tax laws and regulations, consistent with the values of honesty and fairness outlined in EssilorLuxottica's Code of Ethics.

EssilorLuxottica is committed to complying with the rules of competition law within its business practices. The Company has a formal Competition Law Compliance Program and has implemented a Competition program that defines principles of conduct in the management of business practices and includes specific training activities.

In the event of investigation, dispute, conviction or penalty, the Company adopts a transparent and accountable approach, conducting investigations, implementing corrective actions and enhancing governance frameworks to prevent future occurrences.

For this reason, EssilorLuxottica considers that it ensures compliance with minimum safeguards for the activities covered by CapEx point (c).

Alignment assessment

Below is a summary of the alignment assessment for each activity identified as eligible after the application of the materiality threshold.

Activity	Substantial Contribution	DNSH
Acquisition and ownership of buildings (7.7)[a]	The Company is continuously working to strengthen the alignment of its real estate activities with EU Taxonomy requirements. In 2025, the Company is actively progressing its alignment efforts by reinforcing the primary energy demand assessment for its building portfolio, to increase the proportion of Taxonomy-aligned assets going forward. Where complete technical documentation was not available, in particular for assets located outside the European Union, a conservative approach was applied. EssilorLuxottica acknowledges the challenges of aligning retail and lease activities with Taxonomy technical specifications, particularly due to the diverse nature of the retail businesses located within larger mall environments, and regulatory and contextual differences applicable to non-EU countries.	For the lease of stores, the projects were subject to a physical climate-risk assessment and adaptation plan for the climate risks assessed. For certain buildings, particularly those situated outside the EU, differences in regulatory standards and data availability may affect the DNSH compliance, thus a conservative approach has been applied in these cases.

(a) For 2024 reporting the new building construction activities have been classified in this activity. The associated technical criteria for these projects have been analyzed as per the activity 7.1. For 2025 reporting, as activity 7.1 fell below the materiality threshold, activity 7.7 represents only Acquisition and ownership of buildings.

The Company is committed to continuously improving its alignment with Taxonomy standards and will actively work toward integrating more projects and initiatives into alignment frameworks in the future. In 2025, the Company enhanced its processes for 7.7 alignment, resulting in an overall increase in the alignment level for the year.

As specified in Chapter 5 of the 2025 Universal Registration Document, Section 5.1.6 *Notes to the Consolidated Financial Statements* and Note 26, *Contingencies and Commitments* , in 2024, the Group announced the signing of a long-term pre-letting agreement for its new global headquarters in Paris. The related Right-of-Use assets and Lease liabilities will be recognized at the date on which this building is made available by the lessor to the Company, and thus it was not included in this year's Taxonomy assessment for the CapEx KPI.

Based on the assessment above, the following table shows the proportion of turnover, CapEx and OpEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering FY 2025. Following the application of the materiality threshold, the 2025 and 2024 data is not fully comparable, as 2024 data represents the disclosure under the previous Taxonomy methodology.

Financial year (N)	2025				Breakdown by environmental objectives of taxonomy-aligned activities										
KPI (1)	Total (2) (*€ millions*)	Proportion of Taxonomy-eligible activities (3)	Taxonomy-aligned activities (4) (€ millions)	Proportion of Taxonomy-aligned activities (5)	Climate Change Mitigation (6)	Climate Change Adaptation (7)	Water (8)	Circular Economy (9)	Pollution (10)	Biodiversity (11)	Proportion of enabling activities (12)	Proportion of transitional activities (13)	Not assessed activities considered as non-material (14)	Taxonomy-aligned activities in previous financial year (N-1) (15) (*€ millions*)	Proportion of Taxonomy-aligned activities in previous financial year (N-1) (16)
Text	*Currency*	%	*Currency*	%	%	%	%	%	%	%	%	%	%	*Currency*	%
Turnover	28,491	-%											0.01%		
CapEx	2,803	36.26%	13.24	0.47%	0.47%								3.04%	26.94	0.73%
OpEx	25,111	-%											2.86%		

Based on the assessment above, the following table shows proportion of CapEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering year 2025:

Financial year (N)	2025				Environmental objective of taxonomy-aligned activities								
Economic activities (1)	Code (2)	Taxonomy-eligible KPI (3)	Taxonomy-aligned KPI (4) (*€ millions*)	Taxonomy-aligned KPI (5)	CCM (6)	CCA (7)	WTR (8)	CE (9)	PPC (10)	BIO (11)	Enabling activity (12)	Transitional activity (13)	Proportion of Taxonomy-aligned in taxonomy-eligible (14)
Text		%	*Currency*	%	%	%	%	%	%	%	*E*	*T*	%
7.7 Acquisition and ownership of buildings	CCM 7.7	36.26%	13.24	0.47%	0.47%								1.30%
Sum of alignment per objective													
TOTAL KPI		**36.26%**	**13.24**	**0.47%**	**0.47%**								**1.30%**

3 Social Information

3.1 ESRS S1 – The Company's Workforce

3.1.1 Introduction

EssilorLuxottica's results are driven by the collective contribution of more than 200,000 employees, who deliver products of exceptional technical and stylistic quality alongside unmatched levels of service. This worldwide community embodies a distinctive expertise and DNA, aligning with the Company's Mission "Empowering Humans".

To ensure the development of an inclusive and nurturing working culture, the Group is committed to respecting and promoting Human Rights, placing particular importance on applicable laws, regulations and international standards, as well as on the prevention and remediation of material breaches of Human Rights and fundamental freedoms. The Code of Ethics sets forth the principles that apply to all EssilorLuxottica employees, embedding key principles and "golden rules" that represent a minimum set of standards that cannot be compromised. The roll-out of the internal reporting system SpeakUp, the audits performed on the Group's businesses and the different training activities, among others, are key initiatives that support EssilorLuxottica's ethical commitment toward its workforce.

In 2024 and 2025, EssilorLuxottica reaffirmed its commitment to fostering a thriving, inclusive and innovative workplace, aligning its people-centered approach leveraging on the five Company Values and in line with its Mission and business strategy. The year also marked significant consolidation of many Diversity, Equity and Inclusion (DE&I) practices and progress in many aspects such as the Gender Equality certification obtained in France following a similar certification obtained in Italy in 2024. The overall objective of the Group's many DE&I initiatives is to allow each and every employee to express their full potential by being their true self at work.

In 2025, EssilorLuxottica kept nurturing talent through global and regional development programs, mentorships, international job rotations and personalized coaching. These initiatives were enhanced by opportunities to learn directly from senior leaders, cultivating a culture of continuous growth and leadership excellence. In this sense, Leonardo, the Group's innovative learning ecosystem, continued to play a pivotal role in professional education and knowledge-sharing. Delivering over 12 million hours of education in up to 35 languages, it empowered employees, customers and eyecare professionals to expand their skills and expertise, shaping the future of the eyewear and vision care industry.

EssilorLuxottica's approach to employee well-being was also reinforced in its comprehensive support systems, including health benefits, psychological resources, flexible working arrangements and family-focused initiatives such as summer camps and family days. This was complemented by a compensation policy that ensures competitive pay, equal opportunities and merit-based rewards. Employee shareholding programs further strengthened alignment between individual contributions and organizational success, fostering a sense of shared responsibility.

Employee Health & Safety remained a top priority and a fundamental principle guiding daily operations. EssilorLuxottica adopted all necessary measures, consistent with international standards, to minimize work-related accidents, aiming for zero incidents. Through robust Health & Safety programs, including risk prevention measures, action plans, procedures and on-site audits, the Group continued to ensure a safe and secure work environment for all employees.

These efforts, detailed in this section, reflect the Group's core belief that the unique contributions and perspectives of individuals are invaluable assets – enhancing its heritage and equipping the Company to tackle global challenges with strength and resilience.

Workforce composition

EssilorLuxottica's workforce is composed of employees and non-employees who play integral roles in its operations and are subject to material impacts driven by the Company's activities.

As of December 31, 2025, EssilorLuxottica employed 201,176 people worldwide, across various divisions, functions and locations. Considering the Company's vertically integrated business model, employees can be divided into three main groups:

- **Operations employees:** employees engaged in production, assembly and distribution processes across EssilorLuxottica's extensive network of manufacturing plants, RX labs and logistics centers;
- **Store and sales employees:** employees working in EssilorLuxottica's retail stores and wholesale distribution channels who are directly involved in customer engagement and sales;
- **Corporate and administrative staff:** professionals involved in managerial, administrative, research and development and support functions that drive innovation, strategic decisions and operational efficiencies.

EssilorLuxottica also relies on non-employee workers, like agency workers. These are individuals hired and paid by an agency, which in turn has an agreement with the Company to recharge the employee's labor cost. They are employed for specific projects or temporary assignments, particularly in manufacturing, supply chain activities or stores.

The tables below provide a detailed overview of the Company's workforce, including regional and country-specific breakdowns, as well as employee characteristics categorized by gender, contract type, job category and age as of December 31 of each year. The tables present data excluding acquisitions completed during the respective year (Optegra, Optical Investment Group and A-Look Group and other minor acquisitions for 2025, and Heidelberg Engineering and Supreme for 2024).

Total workforce

	2025		2024	
	Number	%	Number	%
TOTAL WORKFORCE	**214,272**	**100%**	**206,533**	**100%**
Total number of employees	201,176	94%	195,428	95%
Total number of temporary/agency workers	13,096	6%	11,105	5%

Note: In 2025, the Group's total workforce increased by 4%, driven primarily by higher activity in labs and plants mainly in Asia-Pacific, growth in retail operations and the integration of 2024 acquisitions. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

Employees breakdown by region

	2025		2024	
TOTAL NUMBER OF EMPLOYEES	**201,176**	**100%**	**195,428**	**100%**
North America	44,322	22%	43,772	22%
EMEA	73,012	36%	71,781	37%
Asia-Pacific	58,376	29%	54,270	28%
Latin America	25,466	13%	25,605	13%

Note: The geographical breakdown of employees is aligned with the regions used for revenue disclosure. The employee distribution by region remained consistent with 2024, with EMEA continuing to represent the largest share of the Group's employee population. The Asia-Pacific population increased, driven primarily by higher activity in plants in China and Thailand. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

Employees breakdown by country (in countries with at least 50 employees representing at least 10% of total employees)

	2025		2024	
TOTAL NUMBER OF EMPLOYEES	**201,176**	**100%**	**195,428**	**100%**
United States	40,639	20%	40,107	21%
China	28,926	14%	26,725	14%

Note: As of December 31, 2025, the Group has two countries with at least 50 employees and representing at least 10% of total employees. The United States represents 20% of total employees and China represents 14%. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

Employees breakdown by gender

	2025		2024	
TOTAL NUMBER OF EMPLOYEES	**201,176**	**100%**	**195,428**	**100%**
Total number of women	120,225	60%	117,436	60%
Total number of men	78,731	39%	76,125	39%
Total number of unknown	2,164	1%	1,827	1%
Total number of other	56	-%	40	-%

Note: As of December 31, 2025, women represented 60% of the Group's employees, maintaining the same level as in 2024. In 2023, the Group introduced a new category, "Unknown", and in 2024, following the guidelines of the European Directive, added the "Other" category. The "Unknown" category includes individuals who choose not to disclose their gender, while "Other" refers to employees who are legally registered with a third, neutral or other gender. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

Employees breakdown by contract type and by gender

	2025		2024	
TOTAL NUMBER OF EMPLOYEES	201,176	100%	195,428	100%
TOTAL NUMBER OF PERMANENT EMPLOYEES	**155,975**	**78%**	**153,498**	**79%**
of which women	93,482	60%	92,205	60%
of which men	61,453	39%	60,420	39%
of which unknown	998	1%	841	1%
of which other	42	-%	32	-%
TOTAL NUMBER OF FIXED-TERM EMPLOYEES	**45,201**	**22%**	**41,930**	**21%**
of which women	26,743	59%	25,231	60%
of which men	17,278	38%	15,705	37%
of which unknown	1,166	3%	986	2%
of which other	14	-%	8	-%
of which total number of non-guaranteed hours employees	***12,536***	***6%***	***13,082***	***7%***
of which women	*7,653*	*61%*	*8,133*	*62%*
of which men	*3,869*	*31%*	*4,034*	*31%*
of which unknown	*1,000*	*8%*	*908*	*7%*
of which other	*14*	*-%*	*7*	*-%*

Note: As of December 31, 2025, employees with permanent contracts represented 78% of the Group's workforce, consistent with 2024. Women accounted for 60% of the Group's employees and remained the majority across all contract types. Non-guaranteed hours contracts (casual contracts) introduced in 2024 following the European Directive, made up 6% of the total workforce, primarily in stores and plants. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

Employees breakdown by contract type and by region

	2025		2024	
TOTAL NUMBER OF EMPLOYEES	201,176	100%	195,428	100%
TOTAL NUMBER OF PERMANENT EMPLOYEES	**155,975**	**78%**	**153,498**	**79%**
North America	33,918	22%	33,660	22%
EMEA	65,875	42%	64,743	42%
Asia-Pacific	32,964	21%	31,678	21%
Latin America	23,218	15%	23,417	15%
TOTAL NUMBER OF FIXED-TERM EMPLOYEES	**45,201**	**22%**	**41,930**	**21%**
North America	10,404	23%	10,112	24%
EMEA	7,137	16%	7,038	17%
Asia-Pacific	25,412	56%	22,592	54%
Latin America	2,248	5%	2,188	5%
of which total number of non-guaranteed hours employees	***12,536***	***6%***	***13,082***	***7%***
North America	*9,332*	*75%*	*9,113*	*70%*
EMEA	*531*	*4%*	*561*	*4%*
Asia-Pacific	*2,673*	*21%*	*3,408*	*26%*
Latin America	*-*	*-%*	*-*	*-%*

Note: As of December 31, 2025, 78% of the Group's employees were hired under permanent contracts, with the highest concentration in the EMEA region. Permanent contracts represented the majority across all regions, accounting for approximately 90% of employees in both EMEA and Latin America. In North America, 23% of employees were hired on fixed-term contracts, while in Asia-Pacific, fixed-term contracts accounted for 44% of employees, mainly in plants and stores. Non-guaranteed hours contracts were used predominantly in North America, reflecting common practice in the local labor market, characterized by greater contractual flexibility. These contracts are not utilized in Latin America. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

Employee turnover

	2025	2024
TOTAL DEPARTURES	**27,814**	**29,610**
Asia-Pacific	3,103	3,296
EMEA	8,805	9,111
Latin America	7,792	8,067
North America	8,114	9,136
TOTAL TURNOVER	**18%**	**20%**
Asia-Pacific	10%	11%
EMEA	14%	15%
Latin America	33%	35%
North America	24%	27%
of which voluntary	***13%***	***14%***
Asia-Pacific	*8%*	*9%*
EMEA	*10%*	*11%*
Latin America	*19%*	*21%*
North America	*18%*	*21%*
of which retirement	***1%***	
Asia-Pacific	*1%*	
EMEA	*1%*	
Latin America	*-%*	
North America	*1%*	

Note: The turnover rate is calculated as the number of permanent employees who left the Group during the reporting period divided by the average number of permanent employees at the end of each month. Voluntary resignation refers to contract termination initiated solely by the employee for reasons such as career development, personal matters, compensation, termination during probation, no-show or mutual agreement. In 2025, the turnover rate, including voluntary turnover, decreased by two percentage points compared with 2024. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

From a gender perspective, women accounted for 59% of all departures and men for 39%, proportions that reflect their respective representation in the workforce. Employees categorized as “Unknown” or “Other” represented 1% and a negligible share, respectively. The Company’s total turnover rate reached 18%, with women and men showing identical rates. Voluntary turnover stood at 13%, similarly balanced across genders.

Looking at age, employees aged 18–29 and 30–50 accounted for 42% and 44% of all departures respectively, reflecting their strong presence in retail and production roles. Departures among employees over 50 represented 13% of total departures, while the number of departures among those under 18 remained minimal. Total turnover rates by age group reached 33% for employees aged 18–29, a figure driven primarily by the high concentration of retail roles among younger employees, 14% for those aged 30–50 and 12% for employees over 50.

From a job-category perspective, departures were mainly concentrated among production and shop staff, who accounted for 79% of all departures, reflecting the size and naturally higher turnover of frontline retail and manufacturing roles. Professional (white-collar) employees represented 16% of departures, Managers and Experts 4%, and Senior Management around 1%. In terms of total turnover, rates reached 21% for Production and Shop Staff, 14% for Professional (white-collar) employees, 9% for Managers and Experts and 7% for Senior Management.

	2025	
TOTAL NEW JOINERS (PERMANENT CONTRACTS)	**25,162**	**100%**
Asia-Pacific	2,423	10%
EMEA	7,126	28%
Latin America	7,154	28%
North America	8,459	34%

Note: In 2025, the Group welcomed 25,162 new permanent employees, with recruitment trends reflecting its global footprint and operational model. Hiring was strongest in North America (34%), followed by EMEA and Latin America (each 28%), and to a lesser extent Asia-Pacific (10%).

New joiners were predominantly early-career talents: employees aged 18–29 represented 54% of all hires, compared with 39% for those aged 30–50 and 7% for employees over 50. From a gender perspective, recruitment remained well balanced and aligned with the Group's overall workforce composition, with women accounting for 59% of new hires and men for 39%. Recruitment was primarily concentrated in frontline roles, with production and shop staff accounting for 84% of all hires. Professional positions represented 13%, Managers and Experts 3%, while Senior Management hiring remained limited.

Impacts, risks and opportunities related to the Workforce

EssilorLuxottica's employees, as highlighted for each section in relation to the material topics, can be subject to material impacts related to working conditions, Health & Safety protocols, skills development and career growth opportunities within the Company's global operations, while both employees and non-employees can experience material impacts related to supply chain practices, labor standards, ethical business practices and sustainability requirements. The Company's commitment in these areas is evidenced in its policies on Health & Safety, fair labor practices, diversity and inclusion, and ongoing investments in workforce development and well-being.

The identified opportunities, such as driving efficiencies through a diverse and inclusive environment and providing employee benefits, can strengthen the organization's connection with global markets, fostering greater efficiency and sustainable growth. The various identified IROs generally relate to the entire workforce, with particular attention paid to the most vulnerable categories. Currently, efforts are primarily focused on promoting gender balance, through the DE&I team's global strategy, which is then implemented locally to respond to specific needs, as a key area of action to enhance the Company's profile in this regard.

The identified risks, established through the double materiality assessment, can include challenges such as a potential lack of attractiveness for certain scarce profiles (e.g., doctors and optometrists essential to supporting the retail business), difficulties in retaining employees (particularly among Gen Z), and risks related to non-compliance with working hours and work environment regulations.

These issues could lead to reputational and financial consequences, adversely affect workers' health and increase the likelihood of workplace accidents. Negative impacts related to the workforce are also shaped by systemic challenges depending on the region, such as potential concerns around fair wage practices, limited social dialogue measures or inadequate Human Rights practices, as well as global risks tied to the Group's activities, including potential exposure to various workplace hazards.

As of today, the Group has not identified any material negative impacts on its workforce stemming from transition plans aimed at reducing environmental impacts and achieving climate-neutral operations. The procedure for setting targets related to managing material impacts, risks and opportunities varies depending on the specific topic, ensuring that each area is addressed with the appropriate level of attention and precision.

For social factors, the approach could involve engaging with local stakeholders (e.g., social dialogue channels like the European Works Council) or conducting surveys among employees to understand their concerns and priorities (e.g., "Your Voice"). Whenever relevant or possible, the Company commits to gathering internal feedback through the various communication channels described in the following sections. Additionally, in some cases, targets are specifically designed to align with international guidelines, best practices or local regulations. For example, the Company may set targets that conform to the expectations outlined in global frameworks such as the United Nations Sustainable Development Goals (SDGs) or align with local laws like the Rixain law, which mandates specific gender equality measures in the workplace, or to pursue internal goals (e.g., Talent development).

These actual and potential impacts, risks and opportunities, along with their management, will be explained in the course of this section.

3.1.2 Employee Engagement & Well-Being

3.1.2.1 Introduction

EssilorLuxottica is committed to supporting its people, continuously enhancing their sense of well-being, while providing them with opportunities to learn and grow. The Company invests heavily in employee engagement, creating an environment where everyone can thrive, feel valued and respected, and continuously learn.

The Company's dedication to employee well-being is reflected in its global approach, which includes health benefits, psychological support, flexible working arrangements and family-focused initiatives such as summer camps and family days. These efforts prioritize work-life balance, community building and a supportive workplace environment.

This approach is reinforced by a socially responsible and inclusive compensation policy that guarantees competitive pay, equal opportunities and merit-based rewards. At its core is employee shareholding, which fosters collective responsibility, aligns individual and organizational goals and offers employees a direct stake in the Group's success. Through accessible co-investment plans and performance-based rewards, EssilorLuxottica promotes engagement, equity and a sense of shared purpose, positioning employees as key contributors to its Mission and Values.

Through its various regular internal communication and feedback channels, the Company ensures adequate support for its employees, actively preventing material negative impacts and promptly addressing any issues that arise.

This section provides an overview of policies, actions, metrics and, when available, targets to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities related to EssilorLuxottica's own workforce.

3.1.2.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG topic	IRO name	Policy	Main actions	Target/Metric
Employee Engagement and Well-being	Risk of lack of attractiveness and retention of employees	• Global DE&I Policy • Global Policy on Engagement & Well-being • Global Policy on Employer Branding and Talent Attraction • Global Policy on Salary Review	• Your Voice annual global survey • Welfare and Well-being progressive mapping • Time4You pilot escalation • Work-life Balance Manifesto in Retail	• The Global listening campaign • Group turnover rate (total and voluntary)
	Risk of non-compliance with working hours regulations	• Code of Ethics	• Actively monitoring working hours, overtime and holiday usage through local HR and EHS teams	• Number of audits performed on Human Rights related topics (including working hours)
	Potential inadequate wage practices	• Code of Ethics • Group Compensation Framework • Global Policy on Salary Review	• Fair pay analysis and corrective actions	• Ensuring equity through pay gap monitoring • Integration of the Living Wage concept into the salary review process
	Granting employee benefits	• Global Policy on Engagement and Well-being	• Welfare and Well-being progressive mapping • Work-life Balance Manifesto in Retail	• Share of remote working time globally • Initiatives for flexible work arrangements (Time4You) • Social protection coverage
	Efficiencies related to promoting diverse and inclusive environment	• Global DE&I Policy • Global Anti-harassment and Discrimination Policy	• Your Voice annual global survey • Fair wages analysis and corrective actions	• The Global listening campaign • Ensuring equity through pay gap monitoring
	Reinforcement of employee sense of commitment and engagement through employee shareholding	• Group Compensation Framework	• Since the launch of the first international plan, employee shareholding has continuously evolved to include an ever-growing number of employees worldwide	• Number and rate of employees participating in company shareholding programs

3.1.2.3 Policies

To ensure employee engagement and well-being, the Company has established a series of public and internal policies with additional inclusivity principles. Aside from the Code of Ethics and SpeakUp, which have unique characteristics, all other policies listed below reaffirm the Company's commitment to conducting its activities in full compliance with legal requirements at both international and local levels. The policies aim to safeguard human rights and promote principles established by international organizations, including the 2030 Agenda for Sustainable Development and its related Sustainable Development Goals (SDGs), the United Nations Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organization (ILO) and the OECD Guidelines. The Chief People Officer and his direct reports hold ultimate responsibility for ensuring the proper implementation of these policies. All these policies were developed with the support of technical experts and in collaboration with local HR teams to ensure compliance with local legislation and alignment with the needs of all regions and stakeholders. Internal policies are accessible to employees via the Company intranet or can be provided upon request to the Human Resources function.

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies*.

Document	Function	Scope	Availability
Code of Ethics	Compliance	Own operations	Public
SpeakUp platform + Group Reporting Policy	Compliance/Human Resources	Value chain	Public
Global Diversity, Equity & Inclusion Policy	Human Resources	Own operations	Public
Global Policy on Engagement & Well-being	Human Resources	Own operations	Internal
Global Policy on Anti-harassment and Discrimination	Human Resources	Own operations	Internal
Global Policy on Salary Review	Human Resources	Own operations	Internal
Global Policy on Employer Branding and Talent Attraction	Human Resources	Own operations	Internal
Global Parenthood Policy	Human Resources	Own operations	Internal

3.1.2.4 Processes for engaging with own workers and workers' representatives

EssilorLuxottica's Values and Cultural Framework

In 2022, EssilorLuxottica started to define the Company's shared values representing its people and communities across the world, with the active participation of over 100,000 employees globally in the process. Company values have been infused in all key Human Resources processes in the organization, from performance management and development initiatives to employee listening campaigns. The resulting five Company Values were unveiled in January 2024 and are described below.

Values	Description
We are pioneers – bringing heritage into the future	We are deeply rooted in our legacy – proud of where we came from, yet always innovating and improving the rules of the eyewear and eyecare game. We never stop learning, nor would we want to. We see our search for innovative solutions as an ongoing journey, not a destination. We're curious – keeping up with trends, gathering insight and thinking about the future.
We are one – thanks to many	We are united by a shared vision and made stronger by our differences. Hundreds of thousands of talented people across the globe are the keys to our success. We move as a team – one where everyone's opinions are valuable and where diversity and inclusion are key ingredients to our culture. We want everyone to feel comfortable to be themselves – building each other up, playing on each other's strengths and as a team.
We are agile – making the complex simple	From product design, to supply logistics, to marketing and communications – this industry is far from straightforward. Our years of experience allow us to deliver sophisticated solutions with impressive speed. We thrive in this fast-paced environment, always embracing new ways of doing things and optimizing wherever possible. If there's a simpler way to achieve the same results, we'll find it. We share often and actively with all our stakeholders to identify pain points and turn them into strengths.
We are passionate – turning inspiration into impact	Passion is what wakes us up every morning, and the results are what keep us going. We are each committed to our role in the bigger picture, and we're motivated by a culture of mutual trust. We have a goal-oriented culture and we're driven to achieve the best results for the Company and for ourselves. We take pride in our roles, owning our tasks and seeing ideas through from start to finish.
We care – close to all no matter how far	The people who come through our doors are at the core of everything we do. And that includes ensuring a brighter future for all – continuing our commitment to sustainable practices. We have a global reach, but we feel connected to our customers on a personal level – always considering how our roles and decisions affect the larger customer experience. This is especially true when it comes to our products. We want to make a positive social impact, and we work hard to reduce our environmental footprint too.

Your Voice – Culture Insights

EssilorLuxottica's employee listening program, *Your Voice – Culture Insights*, is an ongoing initiative that uses confidential and anonymous questionnaires to gather valuable insights into key aspects of employees' experiences, such as sense of belonging, alignment the Company Values, workplace culture and overall working environments, as well as the Group's approach on environment and sustainability. Feedback collected through this program is transparently shared in aggregated form, highlighting strengths and areas for improvement, and driving the development and update of local and global action plans.

To ensure accessibility, the program leverages on technology, allowing employees to respond quickly and anonymously in 37 languages. In 2025, more than 140,000 employees were involved in the Your Voice listening program, resulting in a global participation rate of 80% across all regions and businesses, including offices, stores and industrial sites. The 2025 campaign has shown an incremental participation of 2%, with consistent improvement across all employee categories.

The outcome is accessible to Managers and HR teams, so they can initiate team conversations and workshops with local employees to build concrete actions for improvement. Employees are informed and involved in co-creating action plans to improve overall employee experience.

The main key indicator of EssilorLuxottica's global listening campaign is the "Sense of Belonging", an index ranging from 0 to 100 that measures the attachment employees feel toward the Group. It maps satisfaction, pride and likelihood of recommending the Company as a very good place to work. In 2025, the Sense Of Belonging score registered a solid 76/100 reflecting the work done to make EssilorLuxottica a great place to work.

Other channels

EssilorLuxottica utilizes a variety of engagement channels to maintain open and continuous communication with its employees, in alignment with the Company's five shared Values.

These include regular updates facilitated by local HR Business Partners, the "Comitato Welfare" (Welfare Committee) in Italy and the "Comité Social et Économique" (CSE, Social and Economic Committee) in France, where monthly meetings provide a platform for open dialogue. Senior HR representatives attend these meetings, such as the Italian Welfare Director and his team in Italy, or the country HR Director and his team in France.

All these processes are overseen by the Industrial Relations & Welfare Global Team to ensure alignment across the Group.

The global whistleblowing platform, SpeakUp, is also another important engagement channel (see Section 4.1.5.1 *SpeakUp reporting system* for more details).

3.1.2.5 Processes to remediate negative impacts and channels for own workforce to raise concerns

EssilorLuxottica fosters a culture of open communication through its Open-Door approach, underscoring the importance of offering employees channels to report unethical behavior, violations of the Code of Ethics or breaches of other corporate policies related to HR and well-being. These channels are designed not only to highlight potential issues related to risks and negative impacts on employees, but also to enable tailored remedial actions based on the specific issue and its severity. Employees are encouraged, by their HR Business Partner and as written in the SpeakUp policy, to raise concerns with their manager, HR department or senior leadership, or alternatively, they can directly contact the Compliance department.

If these options are not feasible, employees can use the Group's SpeakUp reporting platform, launched worldwide in 2023 (see Section 4.1.5.1 *SpeakUp reporting system* for more details).

To address specific potential negative impacts, the Company implements monitoring measures for specific KPIs, for example related to wage practices. Where necessary and feasible, remedial action plans are then developed, as detailed in the relevant Section 3.1.2.6, paragraph *Equitable and Competitive Compensation Framework*.

3.1.2.6 Actions and Resources

EssilorLuxottica's Commitment to Employee Well-Being

Employee well-being is central to the Group's organizational culture, as a healthy, balanced and engaged workforce is key to sustainable success.

EssilorLuxottica recognizes the crucial role a strong welfare system plays in unifying ongoing integration efforts. The Company continues to align its well-being initiatives through global policies that support employees' work-life balance, for example the Global Policy on Engagement & Well-being and the Work-Life Balance Manifesto promoted by EMEA Retail Optical (detailed in the following paragraphs). The global guidelines are gradually adapted and implemented across different organizational contexts to ensure relevance and effectiveness.

The implementation of welfare and well-being initiatives is in fact also guided by internal analysis such as Your Voice listening initiative insights. In 2025, the Group further advanced this work by conducting internal global mapping of welfare and well-being initiatives, engaging a total of 12 countries where the Company operates to gain more information on the welfare and well-being programs in place. This renewed effort offered a clearer overview of existing practices, highlighting synergies and helping identify potential cross-country partners to support shared well-being programs. By drawing on insights from diverse cultural contexts and employee needs, the Group aims to ensure a well-being approach that is globally coherent yet locally meaningful, maintaining a high standard of care for all employees.

The Company focuses on key areas that enhance employee well-being, fostering a supportive and inclusive environment worldwide. These initiatives, which address diverse needs while underscoring the Group's commitment to health, work-life balance and community engagement, are summarized below.

- Flexible Working Arrangements

  EssilorLuxottica prioritizes work-life balance by embracing flexible work models tailored to individual and organizational needs. For office-based teams, the Group supports variable start times, hybrid models and aims to enable remote work for up to 50% of the time, including the option to work from other locations or offices when appropriate. For industrial and corporate employees, initiatives like "Time4You" in Italy provide shift flexibility and advanced scheduling to enhance personal time management. Retail staff benefit from well-structured shift planning and, where feasible, access to part-time arrangements and adaptable work weeks, which help address personal needs, in line with the objectives of the Work-Life Balance Manifesto promoted by EMEA Retail Optical. These practices support the shared ambition to enhance work-life balance while maintaining operational performance.

- Listening Initiatives

  To continuously improve its well-being programs, EssilorLuxottica regularly conducts surveys and listening initiatives such as Your Voice. In 2025, the initiative was carried out once again to monitor results over time and foster ongoing improvement, ensuring that action plans effectively enhance the overall work environment.

- Healthcare

  EssilorLuxottica has always placed great importance on offering its employees healthcare, such as health insurance and supplementary services, in addition to the coverage provided by law. These services include medical check-ups and discounted tariffs. Those services are constantly updated to meet specific employee expectations. For instance, in several countries, flu vaccination campaigns and telemedicine services are also provided.

- Sport and Active Lifestyle

  The Company actively promotes physical activity through initiatives such as corporate gym programs, subsidized access to fitness services and, in some countries, the organization of internal or inter-company sports tournaments or equivalent alternatives. These programs encourage employees to lead an active lifestyle, enhancing both physical and mental health.

- Healthy Eating

  To support proper nutrition, EssilorLuxottica facilitates access to subsidized meals through free canteens, meal vouchers or discounts at local restaurants. Additionally, the Company has in place initiatives like the Eyes on Food program to promote healthy and sustainable eating habits in its canteens.

- Psychological Support

  Recognizing the importance of mental health, EssilorLuxottica offers free, anonymous and confidential psychological support to employees in need. These services are provided through partnerships with specialized facilities, offering both in-person and remote assistance.

- Summer Camps

  Every year, the Group organizes a summer camp in Bibione, Italy, hosting over 2,000 children of employees from more than 20 European countries. During the camp, participants engage in various sports, improve their language skills and build meaningful connections that strengthen relationships among employees' families across different countries. The initiative promotes inclusivity by welcoming children with physical or psychological disabilities, as well as those with special educational needs, ensuring that each child receives appropriate support to fully benefit from the experience. It also demonstrates a strong commitment to respecting religious and cultural diversity, for example by offering kosher meals and implementing practical measures to ensure that all participants feel comfortable, respected and fully included throughout their stay. The program continues to grow each year, with new legal entities and countries joining – in the 2025 edition, for example, Denmark participated for the first time – and the goal is to further expand participation in the coming years.

- Family Days

  In countries like Italy, the US, China and Brazil, EssilorLuxottica hosts Family Days, inviting employees and their families to visit work sites. These events build a sense of pride and belonging by opening factory doors to the community, complemented by games and interactive activities.

- Family Benefits

  Following the mapping exercise launched in 2024 and the data analysis carried out in 2025, the Group reaffirms its commitment to supporting families. This effort combines compliance with local regulations with the introduction of initiatives that go beyond what is required by law. Alongside measures and policies (such as the Global Parenthood Policy) that protect maternal roles, the Group also promotes parental leave for fathers and offers support in emergencies or unexpected situations. These initiatives are part of a broader global strategy that seeks to promote employee well-being and encourage a positive work-life balance, while considering the cultural and regulatory contexts of each country. In 2025, 94% of EssilorLuxottica employees were entitled to take family-related leave, with eligibility levels consistently high across all regions. Globally, 9% of employees made use of family-related leave, with higher uptake among women. EMEA showed the highest usage rate (13%), followed by Asia-Pacific (10%), while Latin America and North America reported lower levels of take-up. These results reflect both broad access to family-related rights and regional differences in usage patterns. The results of this process will provide the basis for the 2026 initiatives, aimed at further developing the Group's welfare approach.

EssilorLuxottica is also committed to promoting decent working time by actively monitoring working hours, overtime and holiday usage through its local HR and EHS teams. The Group aims to ensure that employees do not exceed the maximum working hours and overtime limits established by local or national laws. These principles are clearly outlined in the Code of Ethics and are communicated to employees during recruitment or upon request.

Employee volunteering

In 2025, EssilorLuxottica continued to inspire employee involvement in the impactful work of the OneSight EssilorLuxottica Foundation, as highlighted in Section 3.3 *ESRS S3 – Affected Communities*. Employees are encouraged to participate in activities that advance global eye health, such as contributing to vision clinics or supporting initiatives tied to World Sight Day.

During the year, over 7,300 employees actively volunteered in vision clinics or in skills-based activities providing patient care in their regions. This approach not only amplifies the Foundation's mission to eliminate uncorrected poor vision in a generation, but also deepens employee connection to the Company's broader purpose and social impact.

Equitable and Competitive Compensation Framework

EssilorLuxottica has established a compensation policy that is competitive, fair and aligned with market practices, designed to recognize and reward its 200,000 employees worldwide. This policy is based on three core principles: pay equity for work of equal value, performance-based compensation and the equitable sharing of value created.

By fostering a culture of excellence, innovation and diversity, the Group enhances employee engagement, drives individual and collective performance and supports talent development, all in service of its Mission: "Empowering Humans".

Beyond monetary compensation, the Group's holistic approach integrates value-sharing mechanisms, social benefits and comprehensive protection and support programs for employees and their families, all within a centralized governance framework designed to ensure fairness.

The Group's compensation policy is built on four fundamental pillars, described below:

1. Employee Shareholding: a model for Engagement and Value Sharing

Since its inception, the Group has closely involved its employees in value creation, fostering a strong sense of belonging and alignment with its long-term vision. Every year, nearly 100,000 employees are eligible to participate in co-investment plans, open to all employees without distinction of status, with flexible participation options, such as instalment payments, to facilitate investment. In parallel, more than 10,000 employees benefit from performance share plans. These plans foster alignment between beneficiaries' contributions, the Group's strategic priorities and shareholders' interests.

In 2025, up to 97,000 employee shareholders across 85 countries held a financial stake in the Group. The ambition is to increase the number of employee shareholders in order to strengthen collective engagement and the sharing of the value created.

To support employee shareholders, a dedicated internal team provides day-to-day assistance, clear and accessible information, simplified administrative procedures with financial institutions and financial education initiatives. A personalized support framework, complemented by a dedicated intranet platform, enables each employee shareholder to monitor their portfolio in real time and access relevant information and tools.

The Group is also committed to listening to employee shareholders by actively gathering their feedback to continuously refine its programs and strengthen the bond of trust and engagement.

2. Commitment to Employee Well-being

As explained in the previous section, the Group has long embedded the protection and support of employees and their families at the core of its culture, to enhance the daily lives of its employees. Through the welfare program, the Group ensures a sustainable balance between professional and personal life, offering concrete support at every stage of an employee's journey.

3. Performance-Based Compensation & Equity Promotion

The Group's compensation policy is built on a culture of performance and fairness. By recognizing individual contributions and ensuring equitable rewards, employees are empowered to realize their full potential and contribute to collective success.

The policy is structured around three core compensation processes:

a) Annual Salary Reviews;

b) Annual Variable Compensation;

c) Long-Term Incentive (LTI) Plans.

a) Annual Salary Reviews

The Group's salary review process follows a fair and structured approach, aligned with individual performance, market practices and the Group's strategy. Compensation adjustments are based on objective criteria, including achieved results, alignment with the Group's values and leadership model as well as career development potential.

This process, led by the Human Resources team in collaboration with managers, aims to recognize and reward both individual and collective contributions to the Company's success.

2025 Gender Pay Gap analysis

In line with its commitment to equity and transparency, the Group developed a methodology to analyze pay disparities, based on the fundamental principle of "equal pay for equal work".

This methodology follows a two-step approach:

- national-level analysis of pay gaps based on job classifications;
- consolidation at Group level to determine a global gender pay gap ratio.

The 2025 gender pay gap analysis, conducted on 180,000 employees, (89% of the Group's workforce), was based on annual cash compensation levels across all employees[1].

In accordance with regulatory requirements, a Group-level ratio was calculated without job classification, showing no median pay gap and an average gap of 18% in favor of men, compared with 2% and 16% respectively in favor of men in the previous fiscal year.

This methodology may lead to significant year-to-year variations, in particular due to changes in workforce composition, remuneration levels and foreign exchange effects. For illustrative purposes, the application of 2024 exchange rates would have resulted in a median gap of 1% in favor of women and an average gap of 15% in favor of men, highlighting the impact of exchange rate fluctuations.

Initiatives undertaken by the Group to improve representation of women, particularly within executive functions, together with salary review and staff mobility dynamics, helped to lower the median pay gap.

Taking into account employee classifications in each country, the global median gender pay gap amounts to 4% and the average gap to 5% in favor of men. Levels remain identical to the previous year and reflect an overall stable situation that continues to be closely monitored.

Although the data above indicates that no significant gender pay gaps have been identified, the Group remains committed to maintaining rigorous monitoring of this issue.

Concrete actions have been implemented to proactively address factors that may contribute to gender pay gaps, including:

- unconscious bias training to raise awareness among teams and managers;
- dedicated support programs to assist employees, particularly during their return from maternity leave;
- gender pay gap monitoring tools, integrated into the Group's information systems.

This proactive approach also makes it possible to anticipate regulatory developments, notably the EU Directive on pay transparency.

2025 Adequate Wage analysis

Beyond statutory minimum wage requirements, ensuring a compensation level in line with a decent standard of living is at the core of the Group's principles.

According to the ILO, an Adequate (Living) Wage is "a wage that meets the needs of workers and their families, taking into account the national economic and social conditions of a country".

In 2025, a study covering 180,000 employees, representing 89% of the Group's workforce, was conducted based on the data used for the analysis of gender pay gaps.

Using the minimum wage defined by legislation or collective bargaining agreements as a reference for a decent wage, the analysis confirms that, in all countries where a statutory minimum wage applies, 100% of the Group's employees receive a base salary above this threshold.

When additional fixed components such as seniority and holiday bonuses are included, total fixed remuneration surpasses this threshold even further.

In countries without a legal minimum wage, compensation was compared against a living wage benchmark provided by the Fair Wage Network[2].

The study identified 135 employees (0.07% of the workforce) whose compensation is below the reference decent wage, primarily due to remuneration structures specific to the retail sector. This figure, down from 236 employees in 2024, reflects a significant improvement.

EssilorLuxottica is committed to continuously improving its compensation practices. The principle of a living wage is integrated in its salary review process to ensure remuneration remains fair, competitive and aligned with evolving market standards.

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(1) *Base salary data was collected using the Group's centralized information systems. Additional information on other fixed and variable monetary compensation elements was gathered through files provided by all eligible entities, enabling the creation of a comprehensive global database. Certain populations were excluded from the analysis, including apprentices, interns and equivalent contracts, as well as entities whose remuneration data has not yet been consolidated at Group level. To ensure the reliability of results, consistency checks were carried out to confirm that all salaries were recorded on a full-time equivalent basis and to identify potential anomalies.*

(2) *The minimum wage refers to the wage floor established by governments, providing a baseline level of income, ensuring that workers receive a just compensation for their labor and can meet fundamental living costs. The living wage represents the minimum income necessary to cover the basic needs of workers and their families. The Group has calculated the living wage using the methodology of the Fair Wage Network to ensure a sustainable standard of living for employees.*

2025 Total remuneration ratio

The remuneration ratio results are presented in 4.3.3 *AFEP-MEDEF Compensation and Benefits Tables of the 2025 Universal Registration Document*.

These ratios show the gap between the remuneration of executive corporate officers and the average and median employee remuneration, in accordance with the PACTE Law (2019-486) and Ordinance 2019-1234.[1]

The individual ratios for each executive, as well as the methodology, are detailed in this section.

b) Annual Variable Compensation

The annual variable compensation ("MBO") for corporate executive officers is based exclusively on quantitative objectives. For 2025, three key criteria have been defined: earnings per share, revenue growth and adjusted operating income.

These three criteria form the Group-wide component of the variable pay scheme, applicable to 22,000 eligible employees. This Group component is further complemented by quantitative objectives specific to each business unit and function, ensuring a fair and relevant performance evaluation.

Few Group employees are also eligible for corporate social responsibility (CSR) criteria as part of their annual variable compensation. These criteria primarily relate to the reduction of carbon emissions, waste recovery and the reduction of water consumption. In addition, CSR indicators are also integrated into the roadmaps of lens manufacturing operations, applying to approximately 800 employees and covering energy consumption and waste management.

c) Long-Term Incentive (LTI) Plans

These plans, designed to align employees with the Group's strategic priorities and to strengthen long-term engagement, are based on conform performance criteria applicable to all 10,000 beneficiaries. For the 2025-2028 plan, these criteria are structured as follows:

- 50% based on cumulative adjusted net earnings per share;
- 30% based on annualized share price growth;
- 20% based on corporate social responsibility (CSR) objectives.

As explained in Appendix 2 of Section 4.3.2.2.3 *of the 2025 Universal Registration Document*, starting in 2024 a CSR criterion is integrated into the performance share plan.

4. Centralized Governance & Local Adaptation

A strong governance framework is essential to ensure a coherent and equitable compensation policy across the Group. The Board of Directors defines the executive compensation policy, which is then rolled out to all employees, incorporating country-specific adaptations when necessary.

The three key compensation processes – annual salary reviews, annual variable compensation and long-term incentive plans – are managed at the corporate level. Corporate teams establish timelines, principles and guidelines while providing the necessary digital tools to ensure a harmonized and efficient remuneration system. Local teams are responsible for implementing these directives while applying adjustments required by national regulations and market conditions. This balance between centralization and local flexibility helps maintain overall consistency while addressing the specific needs of each country.

To ensure maximum transparency, compensation and benefits, information is communicated through multiple channels, including Group-wide information sessions, intranet updates, email communications, welcome booklets and personalized letters. HR teams and local managers play a key role in supporting employees and addressing their queries, strengthening trust in the process.

The Group encourages an open and constructive dialogue to continuously improve its compensation policies. Employees can share their concerns and suggestions through various tools, including the "Your Voice" engagement survey or by reaching out directly to HR and local managers. If necessary, these concerns can be escalated to higher levels of management.

As a last resort, a confidential SpeakUp hotline allows employees to report sensitive issues anonymously. This approach ensures that every voice is heard and that appropriate actions are taken, fostering an equitable and respectful work environment.

(1) *As a reminder, in order to cover at least 80% of the payroll in France, while taking into account the Group's development, the scopes used to calculate total remuneration ratio for France are Essilor International SAS, EssilorLuxottica SA, BBGR, Luxottica France, GrandVision France and Sunglass Hut France. The workforce used to calculate average and median compensations corresponds to a full-time equivalent workforce present continuously over the last two fiscal years. Compensation taken into account to calculate the ratios includes:*
- *for Corporate Officers: base salary, annual variable compensation paid during the year in respect of the previous year, long-term incentive vested during the year, benefits in kind, Directors' compensation due in respect of the year;*
- *for employees (full-time equivalent): fixed compensation, annual variable compensation paid during the year in respect of the previous year, profit-sharing and collective incentive plans paid in the year, long-term incentive vested during the year, benefits in kind, individual premiums paid during the year.*

The valuation of long-term incentives reflects the amounts actually vested during the year. The compensation taken into account for Corporate Officers and employees is gross and does not include the employer's contributions.

3.1.2.7 Targets and Metrics

The Company pursues continuous improvement through specific targets and monitors the impact of its actions using defined metrics, as detailed so far and in the following section:

Welfare & Well-being

EssilorLuxottica continues to actively foster a supportive and inclusive work environment. In 2025, the Group has been strengthening its commitment through the mapping of welfare and well-being initiatives with the purpose of defining central guidelines to be cascaded at local level. Moreover, this effort aims to share and align best practices across regions, create synergies, and identify, where possible, cross-country partners to support shared well-being programs. By leveraging insights from diverse cultural contexts and employee needs, the Group ensures that its well-being strategies remain globally consistent while locally relevant, maintaining a high standard of care for all employees worldwide.

Compensation

Adequate Wages: EssilorLuxottica strives to continuously improve (with progress compared to 2024) its compensation practices to ensure fairness and sustainability. The concept of living wage is integrated into the salary review process, reinforcing the Group's commitment to providing wages that support a decent standard of living.

Gender Pay Equity: while the available data indicates that no significant gender pay gaps are observed at the Group level, EssilorLuxottica recognizes the importance of maintaining constant vigilance to ensure pay equity. The Group is committed to regularly monitoring gender pay gaps and taking necessary measures to ensure equity at all levels.

3.1.3 Health & Safety

3.1.3.1 Introduction

For EssilorLuxottica, guaranteeing and protecting employees' Health & Safety is a top priority and a common principle that will continue guiding daily operations. EssilorLuxottica has adopted all necessary measures, consistent with international standards and the target for reducing work-related accidents to a minimum.

EssilorLuxottica is committed to achieving zero work-related accidents through the implementation of strong Health & Safety programs that focus on identifying and preventing employee risks in the workplace. To achieve this, the Group has policies, action plans, procedures and on-site audits aimed at reducing the occurrence, frequency and severity of accidents.

3.1.3.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome*.

Material ESG Topic	IRO name	Policy	Main actions	Target/Metric
Health & Safety	Potential exposure to various workplace hazards	• EHS Policy • Product Stewardship Policy • Code of Ethics • EssilorLuxottica Machinery Safety Policy • Group EHS Roles and Responsibilities policy • Group Ergonomics Risk Assessment Procedure • EHS Global Incident and Investigation policy • Group Lockout-Tagout (LoTo) Procedure	• Deploying a safety culture within the Company (e.g., through procedures, trainings, newsletters) • Assessing H&S risks • Audits and certifications	• Zero work-related fatality • Frequency rate • Severity rate

3.1.3.3 Policies

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies.*

Document	Function	Scope	Availability
Code of Ethics	Compliance	Own operations	Public
Environment Health & Safety Policy	EHS	Own operations	Public
Product Stewardship – Safety and Compliance of Chemicals, Materials and Components Policy	EHS	Own operations	Internal
EssilorLuxottica Machinery Safety Policy (ELMS)	EHS	Own operations	Internal
Group EHS Roles and Responsibilities Policy	EHS	Own operations	Internal
Group Ergonomics Risk Assessment Procedure	EHS	Own operations	Internal
EHS Global Incident and Investigation Policy	EHS	Own operations	Internal
Group Lockout-Tagout (LoTo) Procedure	EHS	Own operations	Internal

At Group level, the Environment, Health & Safety function reports hierarchically to the Chief Operations Officer, being part of a larger group of supporting functions that provide risk management, mitigation activities and programs across different business divisions.

The EHS Organization has a capillary presence from Corporate to site level. Four pillars have been identified at global level, to support the Company's main business areas:

- Frames manufacturing;
- Mass Production manufacturing;
- Prescription lenses manufacturing;
- Retail & Offices.

The EHS Excellence Team acts as cross-organizational liaison to ease approach in terms of definition and standardization.

Each pillar has a Corporate EHS Team responsible for coordination and supervision, as well as Regional EHS coordinators that help at regional level. At country/site level, EHS representatives are appointed whenever there is deemed to be a specific organizational need..

Corporate and regional EHS teams are responsible for:

- deploying EHS policies and standards related to the business areas;
- ensuring appropriate application/monitoring/reporting of implementation levels, performance, achievements and compliance.

They represent the point of reference for all regional leaders and support site directors in environmental protection, occupational health and safety and loss prevention.

The EHS Excellence team enhances current practices by providing Group guidelines, standards and policies, in line with the most updated applicable rules/regulations and with the Group's commitments, to identify and control safety risks for employees.

In 2025, the global EHS organization comprised more than 300 professionals.

3.1.3.4 Engaging with own workforce on Health & Safety

EssilorLuxottica is strongly committed to consolidating a sense of belonging and safety in the workplace by implementing two-way communication on Health & Safety issues.

A number of global and local initiatives support the continuous development of the Company's safety culture:

- Safety Committees – At regional and local levels, site leaders involve employees in safety-oriented initiatives on a regular basis (weekly to monthly), including observations and feedback on unsafe acts/unsafe conditions, with the goal to build action plans to mitigate all risks observed. Insights from these initiatives may feed into decision-making processes at Group level.
- Behavior-based Safety Program – Present in every region on different sites, this program encourages employees to observe and identify potential risks. By so doing, the Safety culture within the organization is enhanced. In Italy, an advanced BBS program has been developed, with a dedicated policy and guidelines released in 2025.
- Safety Corners – These are designated spaces for posting information on Health & Safety matters and reporting unsafe or risky situations for workers.
- Incident reporting – Safety Policies and procedures in force allow employees to escalate any safety incident to management. This ensures the Company keeps visibility of all the processes directly with the eyes of the workers. Moreover, EssilorLuxottica tracks and monitors a series of statistics related to incidents, near misses and potentially unsafe actions and conditions that constitute leading KPIs for continuous improvement.
- Safety Bulletins – They enable timely communication of relevant information to all workers within the site. The information spread is often related to specific topics raised by the workforce itself.

- Safety Days – These events represent one of the Global initiatives that allow the Company, annually or more often, to create engagement, inform and educate on safety-related topics, often raised by the workforce itself.
- Town Hall meetings – These regional meetings provide the organization with some updates on business, performance and EHS initiatives at global and local level.
- EHS Newsletter – A Global EHS Newsletter to the EHS and its main stakeholders' network increases visibility of initiatives and best practices within the Group. The main aim is to work on the safety culture aspect and awareness, further engaging employees at site level on EHS-related topics.
- EHS Global Alert – The system has been integrated into the overall Incident & Investigation process, to ease the cascading of information on main events, assess local situations, create actions plan and monitor potential gaps, to finally prevent reoccurrence of the same incident on another site.

Facility leaders, led by the Chief Operating Officer (COO), are responsible for the implementation of the above-mentioned initiatives.

KPIs are regularly updated on the different tools at regional or local level, while minutes of meetings and completion of actions are monitored at local level. Where regulations may require it (e.g., in Italy), specific meetings, reports and agreements may be drafted with Unions.

Respecting local regulations, EssilorLuxottica acknowledges the value of engaging with Trade Unions and Site Committees as an added dimension for sustainable business growth through participative means. The details about all the initiatives EssilorLuxottica deploys to engage its own workers are described in Section 3.1.4 *Social Dialogue and Freedom of Association*.

The Company also participates in Regional EHS Associations or Networks to contribute to conversations related to Safety and Environmental topics, to overcome specific risks or to support the development of guidelines for local authorities.

3.1.3.5 Preventing and managing Health & Safety risks to people

EssilorLuxottica is committed to ensuring healthy and safe working conditions, protecting its entire workforce in all its locations in compliance with all applicable legislation and regulations. Such commitment is based on the continuous improvement of Health & Safety policies and procedures across countries and on the application of company-wide safety procedures and vigilant preventive actions that encourage responsible behavior from all workers.

EHS policies also apply to all temporary workers, who may be engaged across the Operations for seasonal or business-specific needs, as well as for activities at site level that may be contracted out and regulated by local procedures. Whenever a relevant risk activity is identified, the Company ensures the protection of workers' health through risk mitigation actions and protective measures.

Regular health monitoring programs to prevent potential impact on workers are also implemented whenever a risk assessment indicates the need, and always in line with applicable legislation and regulations.

EssilorLuxottica operates in regions where the application of Human Rights and environmental regulations may be limited or may not fully align with international standards. In these situations, the Company strives to perform its activities in accordance with international standards for Human Rights and environmental protection, and implements preventive and remedial actions to address actual or potential impacts. For more details, please refer to Section 3.1.7 *Human and Social Rights of Own Workforce*.

The Environment, Health & Safety (EHS) function is responsible for the deployment of environmental management systems aimed at reducing environmental impacts and ensuring safe and healthy working conditions for all employees worldwide. In this respect, the gradual increase in the number of sites or regions ISO 14001 and ISO 45001 certified will support a standard approach to prevention and risk/impact mitigation. The EHS function also consolidates quantitative data collected through Gensuite®, a digital tool used by all the local EHS teams in Operations sites to report H&S KPIs, including observations and near misses raised by the workforce.

The Company also adopts escalation tools and procedures to allow local workers to report potential risks or incidents as described in Section 3.1.3.4 *Engaging with own workforce on Health & Safety*. Consolidated data and events are used to cascade across the organization, using various communication channels, all the actions and initiatives taken to prevent reoccurrence, mitigate specific risks and address the concerns raised.

EssilorLuxottica provides its employees with multiple channels to raise concerns, detect potential risks and be able to address them, thereby contributing to their well-being. The Group fosters a culture of open communication through its Open-Door approach (with the HR team or relevant management) and the global SpeakUp tool (whistleblowing), described in Section 4.1.5.1 *SpeakUp reporting system*.

3.1.3.6 Actions and Resources

Assessing Health & Safety risks

EssilorLuxottica assesses its risk exposure through the Group risk assessment process (see Section 2.1 of the 2025 Universal Registration Document), which incorporates the identification and evaluation of ESG risks such as Health & Safety, and through the EssilorLuxottica Responsible Sourcing and Manufacturing program applied to both manufacturing sites and suppliers globally (see Section 3.2 *ESRS S2 – Workers in the Value Chain*).

Each site assesses the overall and specific EHS risks by applying the Corporate and regional guidelines and adapting the outcome to applicable regional or local regulations. Tracking systems are in place to follow up on actions plan accordingly.

Moreover, a structured approach to the EHS Risk Assessment and MOC (Management of Change) procedures is taken anytime there is a substantial change in the Operations processes or a new process is introduced. The Risk Management Systems for Operations and other mentioned policies address the assessment of main risks and define the procedure to approach them, while the processes at local level are implemented having the main stakeholder drive the specific changes.

Every year, the Company invests in the deployment of the activities described and in other initiatives to improve specific conditions and mitigate material impacts.

Minimizing workplace hazards

As stated in the Group EHS policy released in 2024, EssilorLuxottica's approach to prevent and minimize workplace hazards is consistent with international standards and its target of reducing work-related accidents to a minimum. As such, in the past few years, several production and logistics sites and prescription labs have obtained the ISO 45001:2018 Occupational Health & Safety Management certification, which provides a framework to identify and improve employee safety while preventing workplace risks. In 2025, 64% of manufacturing sites were certified ISO 45001:2018. In addition, 18 lens laboratories, six logistic centers and four corporate offices were certified as well, leading to an overall coverage of approximately 61% of Operations Headcount and 34% of the total Group headcount. The Company will continue to increase the number of certified sites in the future, evolving its own certification schemes according to the Group and business needs.

To achieve the target of zero work-related accidents, Health & Safety programs focus on identifying and preventing Health & Safety risks in the workplace, actively involve employees and include on-site audits, both managed at Corporate and Regional levels.

To reduce the frequency and severity of accidents in the workplace, multiple initiatives have been implemented at Corporate and Regional levels, summarized below:

- Chemicals Management tool – To ensure full respect of the Group policy on Product Stewardship, a new digital solution is under development to manage compliance, industrial hygiene and risk assessment for any new chemicals introduced in the manufacturing processes, working proactively to assess, control and mitigate the risks. This also allows EssilorLuxottica to manage the phase-out of the PFAS group of chemicals (so called 'forever chemicals'). The goal is to roll out the new IT solution starting in 2026, to cover the entire scope of Operations by the end of 2027. Moreover, the Group has completed the mapping of the main Businesses and processes and identified the priority substances used in the Operations processes. A plan to identify the alternative substances/processes to phase out the Priority Chemicals has been defined at Corporate level and is being approached by risk prioritization.
- PFAS program – In 2023, the Company started mapping the presence of PFAS in its products and processes and has launched projects to replace them where present. The PFAS program includes the entire scope of Operations sites for the Company, being regulated by the Product Stewardship Policy who specifically requires the Company to manage those components in terms of introduction and phase-out. Ongoing projects, different for each business line, have been identified to work on substitution of known sources of PFAS. Important progress has been made with specific manufacturing processes.
- High-Risk Operations (HRO) referential – The implementation of technical reference documents is required for any process considered as a High-Risk Operation for people and the environment. The program aims to map all HROs within the Company's Operations sites and to harmonize the approach in terms of technical requirements, risk assessment and auditing process, mitigating and controlling any risks in accordance with the Group's global EHS policy. Launched in early 2024 and continued throughout 2025, the program includes: five audits conducted with an internationally recognized third-party expert, 11 process hazard analyses (PHAs) across the most relevant sites, five technical reference standard documents released to define requirements applicable to mass production manufacturing processes used across the Business.
- Machine Safety program – The new global standard for machine safety was released in 2024, targeting the implementation across Group Operations. The document aims to harmonize existing local policies according to the most stringent international technical standards, allowing the Company to buy and design machines with the highest safety criteria. Implementation started in 2024 within the Mass Production business units and will be extended to the other Operations sites over the following two years. Starting in 2026, the Group plans to apply EU International standards in addition to its internal standards, raising the level of protection. This approach will allow the design of new machines following the same CE certification criteria, regardless of the region in which they are manufactured, purchased and used.
- Behavior-based Safety Program (BBS) – As mentioned above, the program encourages employees to actively participate in detecting existing risks in Operations. First launched in Italy, the BBS program will be gradually extended to the main sites of the entire organization.

- Ergonomics Program – Throughout 2025, continuing on from the initiatives launched in 2024, competence mapping for the RX and Mass Production areas was successfully completed. The survey finalized during this period aimed to identify and consolidate the existing skills within the Group, map ergonomic risks across different sites and assess each site's level of maturity in relation to ergonomics. The insights gathered from this analysis proved essential in guiding subsequent activities such as ergonomic risk mapping and prioritization, definition of the training matrix and organization of the ergonomics network. To support these efforts, the Global Ergonomic Risk Assessment Procedure was developed and released. In 2025, structured training programs on ergonomics were launched, involving several EHS-related functions such as Automation, Time & Methods, Engineering and Manufacturing. Another significant achievement was the active participation of the central ergonomics team in various projects within Quality, Manufacturing and Automation, contributing to 20 initiatives across the RX, Mass Production, Frames and Retail areas. One of the most innovative accomplishments of the year was the launch of a central pilot project leveraging AI-supported software for ergonomic risk assessment. As part of this pilot project, this new tool has considerably enhanced the process by reducing evaluation times, increasing the number of assessed workstations and ensuring alignment of assessment criteria across all sites. Finally, a new collaboration with Satisloh was established to integrate new ergonomic standards from the earliest stages of machine design, while also collecting feedback from production teams to better reflect operators' needs and expectations when using the equipment.
- Reporting tools and digitalization plan – Gensuite® is the main tool for the collection and management of key EHS data and KPIs related to safety and sustainability, enabling the Group to achieve greater data consistency and improve information integration. A dedicated team has been working to expand tool capabilities and strengthen it as the mandatory platform for all Operations sites. In 2025, a deep review of the Gensuite® site organization tree has been completed, to reflect the organizational transformation, from an EHS perspective, on the Business units and Regions side. In 2025, an EHS Custom Power-BI dashboard was created to create tailored KPIs and views on data reporting, depending on needs and performance trends and targets to be monitored.
- Loss Prevention program – The program covers the entire Operations organization from fire, flooding and other potential risk scenarios that would impact workers' safety. A long-term agreement has been signed with an international partner for risk assessment and mitigation on this topic. An IT tool was launched in 2024 to collect and monitor all the audit outcomes to allow the Corporate Team to oversee the implementation of risk mitigation actions. In this way, compliance with the Group's EHS Global Policy and its Loss Prevention procedures is guaranteed, and a plan up to 2028 is being identified to increase the coverage rate and reduce the overall risk to the expected level.
- Auditing system – The EHS auditing system is implemented at regional level, to identify any potential non-compliance or risk situations. Standardized checklists, defined at regional or country level, are used to assess the status of overall and specific EHS topics. The audit focus is primarily on industrial sites, where risks and level of exposure in terms of exposed people to the different risks may be higher. Rotation of sites undergoing audits is pursued to allow more coverage over time. Action plans are established and their completion is measured accordingly. The audit system is also enhanced by the ISO certification process. For instance, in North America, a comprehensive program covering all Rx & Logistics facilities has been launched. It includes weekly safety walks ("Gemba Walks"), using a standardized checklist and common guidelines on how to manage risk mitigation actions.
- Health & Safety training – Regular awareness-raising and training initiatives are delivered to employees via dedicated e-learning modules available on Leonardo and in face-to-face settings.
- WELL certification – Since 2023, the Company has committed to a three-year implementation plan aimed at obtaining WELL certification for 400 optical and sun stores in Europe and US, starting with Salmoiraghi & Viganò in Italy. WELL certification provides a performance-based framework for evaluating and optimizing retail environments across key health-related metrics, including air and water quality, lighting performance, thermal and acoustic comfort, materials safety and operational policies. Its purpose is to ensure that store design and retail management practices measurably support the health, well-being and productivity of both employees and customers. This achievement demonstrates tangible progress toward the goal of transforming the customer and employee experience through healthier environments.

3.1.3.7 Targets and Metrics

EssilorLuxottica is committed to achieving zero work-related fatalities, while bringing major injuries to zero. The Company monitors Health & Safety KPIs at global, regional and local levels, ensuring for all these KPIs that continuous improvement is pursued.

The Company ensures two-way communication with its workers on Safety topics, as described previously. Visibility of consolidated H&S data is given at central level and down to the single facilities where KPIs are presented and shared with workers, who may actively participate to identify actions through the initiative mentioned above.

In specific countries, regulations may require the Company to share and set targets with local workforce representatives. Generally, the targets are set at Corporate level and deployed locally. Safety KPIs are also present in the definition of manufacturing site targets and short-term variable remuneration of the functions involved.

Targets are defined and monitored, having as a reference the consolidation reports on H&S KPIs, led by the EHS Corporate function. The Company commits yearly to ensure better performance compared to the previous year. In specific cases, targets of yearly improvement of certain KPIs may be set and applied top down.

Metrics

Work-related fatalities, injuries and illness

	2025	2024
TOTAL NUMBER OF WORK-RELATED FATALITIES	-	-
Employees	-	-
Agency workers	-	-
TOTAL NUMBER OF WORK-RELATED INJURIES	634	743
TOTAL NUMBER OF WORK-RELATED INJURIES WITH ABSENCE	412	469
Employees	390	439
Agency workers	22	30
TOTAL NUMBER OF WORK-RELATED INJURIES WITHOUT ABSENCE	222	274
Employees	213	267
Agency workers	9	7
NUMBER OF LOST DAYS DUE TO WORK-RELATED INJURIES WITH ABSENCE	13,786	14,218
Employees	13,227	13,914
Agency workers	559	304
TOTAL NUMBER OF CASES OF OCCUPATIONAL ILLNESSES WITH ABSENCE	13	16
Employees	13	15
Agency workers	-	1
NUMBER OF LOST DAYS DUE TO OCCUPATIONAL ILLNESS	1,379	1,457
Employees	1,379	1,456
Agency workers	-	1
FREQUENCY RATE FOR WORK-RELATED INJURIES WITH ABSENCE	1.3	1.7
Employees	1.4	1.7
Agency workers	1.2	1.6
SEVERITY RATE FOR WORK-RELATED INJURIES WITH ABSENCE	0.05	0.05
Employees	0.05	0.05
Agency workers	0.03	0.02
TOTAL RECORDABLE INCIDENT RATE	2.1	2.6
Employees	2.1	2.7
Agency workers	1.7	1.9

In 2025, EssilorLuxottica did not register any fatalities, continuing to direct its efforts on the well-being of its workers, recording relevant improvements in Operations performance on Health & Safety. Moreover, the Health & Safety performance shown in the above table improved compared to the previous year both in terms of frequency rate (-20%) and severity rate (-11%), in line with the Group's effort to ensure a safe workplace. These results are also particularly significant considering the continuous expansion of the reporting scope, both for Operations sites and Retail stores, which led to 88% headcount coverage worldwide, up five points compared to the previous year.

3.1.4 Social Dialogue and Freedom of Association

3.1.4.1 Introduction

At EssilorLuxottica, fostering a culture of open dialogue, respect and collaboration is fundamental to its identity. The Group is dedicated to upholding the principles of social dialogue and freedom of association, recognizing these rights as essential to build a thriving and sustainable work environment. By actively engaging with employees and their representatives, EssilorLuxottica creates pathways for participation, transparency and mutual growth. This commitment, guided by the Company's Code of Ethics and aligned with national laws and practices, ensures that employees' voices are heard and respected.

3.1.4.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG topic	IRO name	Policy	Main actions	Target/Metric
Social Dialogue and Freedom of Association	Potential lack of social dialogue measures	• Code of Ethics	• Ongoing mapping of social dialogue practices and KPIs worldwide • Regular interactions with the European Works Council set in 2024 • Time4You project for blue-collar scale-up	• Representation of employees through regional works councils • Employees covered by collective bargaining • Compliance with local laws and best practices

3.1.4.3 Policies

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies.*

Document	Function	Scope	Availability
Code of Ethics	Compliance	Own operations	Public
SpeakUp platform + Group Reporting Policy	Compliance/Human Resources	Value chain	Public
Global Policy on Engagement & Well-being	Human Resources	Own operations	Internal

3.1.4.4 Processes for engaging with own workforce and workers' representatives

EssilorLuxottica attributes the highest importance to social dialogue and employee engagement. The Group recognizes that open, inclusive communication with employees and their representatives is essential to create a work environment where collaboration, trust and mutual respect can thrive. Social dialogue goes beyond a legal requirement and represents a key enabler of sustainable business development, fostering active participation and constructive exchange between the Company and its workforce.

EssilorLuxottica's Code of Ethics places a strong emphasis on respecting the principles of collective bargaining rights and the freedom of association, which is fundamental to the Group's operations across the globe. The Company adheres to applicable national laws and practices, ensuring that all employees have the right to organize and engage in collective bargaining without fear of discrimination or retaliation. The Group takes a firm stance against any form of discrimination based on trade union membership or participation in workers' associations.

The Company's approach to social dialogue is implemented in practice through processes managed locally by Human Resources (HR) representatives, ensuring that dialogue is aligned with the specific needs of employees in each region. At regional and global levels, the Group consolidates best practices and shares them across countries, maintaining consistency while respecting local laws and cultural differences.

In full compliance with local regulations, EssilorLuxottica places significant value on engaging with Factory Committees and Trade Unions, viewing them as essential partners for the Company. Through regular dialogue, the Company aims to align objectives, address challenges and find solutions that benefit both the business and its employees. This approach is embedded within the Group's corporate governance, where the President of the Employee Shareholders' Association (Valoptec Association) holds a permanent seat on the Board of Directors, highlighting the importance of employee engagement at the highest levels of decision-making. Additionally, EssilorLuxottica's commitment to promoting widespread ownership plans, such as the Boost program (employee shareholding), further reinforces the belief that a work structure driven by social dialogue and shared responsibility fosters mutual growth.

In addition, in 2024, the Group established the EssilorLuxottica European Works Council (EWC), replacing the former French Cedie established within the former Essilor perimeter in 2000. For further details, please refer to Section 3.1.4.6 *Actions and Resources.*

Through these practices, EssilorLuxottica reaffirms its belief that social dialogue, employee engagement and respect for fundamental rights are key drivers of a sustainable and successful business. By embedding these principles into its operations, the Group ensures that its growth is measured not only by financial performance, but also by the well-being and active participation of its workforce.

3.1.4.5 Processes to remediate negative impacts and channels for own workforce to raise concerns

Grievance and Whistleblowing Mechanisms

EssilorLuxottica promotes a culture of open communication through its Open-Door approach, emphasizing the importance of providing employees with avenues to report unethical behavior or violations of the Code of Ethics, which also governs the approach to social dialogue, collective bargaining and freedom of association. Employees are encouraged to raise concerns with their manager, HR department or senior leadership. Alternatively, they can contact the Compliance department directly.

If these options are not feasible, employees can use the Group's SpeakUp reporting tool. This tool consolidates various pre-existing systems and is gradually being rolled out across Group entities.

For further details on the SpeakUp reporting platform and policy and the Open-Door policy, please refer to Section 3.1.7.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns.*

To address the specific risk of a potential lack of social dialogue measures, the Global Industrial Relations function monitors key indicators such as the level of collective bargaining coverage worldwide and engages with all the relevant stakeholders at a regional level. A comprehensive global industrial relations dashboard is currently under development with the aim of monitoring key indicators at a global level, providing valuable insights into the overall workplace climate. For instance, the limited strike activity in 2025 indicates that constructive social dialogue is functioning well across the regions.

Legal disputes with employees also remained minimal and reflect differing local laws and cultures. Ongoing engagement with unions and various internal committees provides continuous feedback that helps the Group refine its strategy each year, as explained in the next section.

3.1.4.6 Actions and Resources

EssilorLuxottica's Industrial Relations function is dedicated to fostering an effective and collaborative social dialogue framework across the Group's global operations. To ensure alignment with the actual needs of employees, social dialogue is managed locally by HR representatives who address specific contexts and cultural nuances. At the regional and global levels, the Group consolidates and shares best practices, ensuring that these approaches are consistently implemented while respecting the unique characteristics of each geography.

This structured approach reflects EssilorLuxottica's commitment to maintaining a dynamic, responsive, and unified engagement process. By adhering to shared guidelines and promoting transparency, the Group seeks to cultivate trust, mutual respect, and sustainable business growth through active dialogue with employees and their representatives.

Strengthening Social Dialogue

In line with EssilorLuxottica's commitment to fostering open and transparent social dialogue, the Group established a new level of consultation and information-sharing with the creation of the EssilorLuxottica European Works Council (EWC). The EWC Constitution Agreement, signed in Paris on February 8, 2024, reinforces the Group's dedication to meaningful employee engagement across Europe.

The EWC represents employees from all 26 EU countries and the United Kingdom, designated according to the local laws and practice and covering over 53,000 employees in EU and an additional 8,000 employees in the UK. This initiative demonstrates EssilorLuxottica's commitment to inclusive social dialogue and sustainable growth through continuous collaboration with employee representatives.

Plenary meetings are organized on a yearly basis. The first one took place in 2024, in Agordo (Belluno, Italy), and saw the attendance of and presentations by company leaders, including the Chief People Officer and the Chief Operating Officer, on different key topics, such as EssilorLuxottica's global strategy, economic and financial performance, and business and operational trends. The second plenary meeting was held in June 2025, at Apollo's headquarters (GrandVision) in Germany, and addressed topics of transnational, social and DE&I relevance.

In particular, the EWC members gained a better understanding of the operational and governance structure of optical retail and learned about the launch of the Optical Retail Manifesto, a document common to all regions that outlines guidelines for work-life balance and sustainable work organization. By so doing, the Group continues to build a workplace culture rooted in collaboration, transparency and trust.

The EWC's Select Committee meets quarterly as a representative group of elected members, serving as the Council's spokesperson to maintain ongoing dialogue with Management and manage consultations on significant or exceptional matters.

The Group integrates workforce impact assessments into major business decisions, with HR teams evaluating employment implications, ensuring regulatory compliance and facilitating required consultation processes.

Across the organization, people-centered solutions are prioritized, including redeployment, re-skilling and upskilling pathways and appropriate transition measures in line with local regulatory frameworks. This approach reflects the Group's commitment to managing organizational changes responsibly and protecting employee well-being.

Time4You – Introduction of the four-day working week

Starting in 2024, EssilorLuxottica implemented a landmark agreement signed in December 2023 with national sectoral organizations in Italy, introducing a new supplementary contract for 2024-2026 and launching the four-day working week in Italian factories.

The initiative allows factory employees to work from Monday to Thursday for 20 weeks per year, on a voluntary basis and with full salary continuity, with most of the cost sustained by the Company. This model extends to manufacturing the flexibility already available to office employees globally – such as the option to work remotely up to 50% of the time – aiming to promote well-being and work-life balance without impacting productivity.

The initiative aligns with international trends where short work weeks adopted through national regulations have shown benefits in productivity and employee engagement, suggesting potential scalability to other countries. It is supported by an analysis of the EssilorLuxottica Italy workforce (generation, gender, geography) and grounded in strong industrial relations, a people-centric mindset and production flexibility.

Collective Bargaining Approach

EssilorLuxottica supports collective bargaining wherever it is provided for by law or local practices. And, where a national agreement exists, the Group encourages additional social dialogue with unions or employee representatives to improve conditions beyond national requirements.

Typically, collective bargaining within the Group focuses on:

- **improved working conditions:** it helps ensure fair wages (higher than the minimum wages provided for by law), adequate benefits, adequate working hours and safe working environments;
- **employee representation:** workers have a collective voice, enabling them to negotiate more effectively than they could as individuals;
- **stability and productivity:** agreements provide clarity and reduce the likelihood of strikes or disruptions, promoting stability in the workplace.

For example, the Group's affiliates in Italy apply a National Collective Agreement ("Contratto collettivo Nazionale di Lavoro per gli addetti alle aziende che producono occhiali e articoli inerenti l'occhialeria" for all industrial or Professional Solution business companies and "Contratto Collettivo Nazionale di lavoro per il Terziario Distribuzione e Servizi" for the Direct to Consumer business).

As in Italy, EssilorLuxottica's employees in France are governed by the Collective Agreement for the metallurgy industry. EssilorLuxottica's subsidiaries in France have also signed several company collective agreements in relation to:

- harassment and sexual harassment, with the appointment of a harassment referent in each subsidiary;
- flexible work arrangements with a certain number of days of work from home, where possible;
- annual negotiations on wages and annual increases.

Social Protection

The EssilorLuxottica Group provides various insurance coverages for its employees, which may vary by country and also within the same country due to ongoing integration processes. They share the same goal to go beyond compliance with applicable local regulations and safeguard employees' well-being as well as maintain the necessary competitiveness in attracting and retaining top talent.

Insurance policies usually include:

- benefits for medical needs and travel accidents related to business trips;
- benefits to supplement the public healthcare services in each country, sometimes extended to cohabiting family members;
- financial benefits in case of death;
- at least a minimum level of accident insurance;
- financial benefits in case of disability;
- benefits in case of work-related accidents.

Statutory social protection coverage varies across regions, reflecting differences in national social security systems and statutory benefits. At Group level, in 2025, coverage ranged from 52% for unemployment benefits to 68% for sickness and employment injury, 65% for parental leave and 64% for retirement.

Coverage was highest in Latin America and Asia-Pacific, where statutory schemes provide extensive protections. In Asia-Pacific, coverage for sickness, unemployment, employment injury, parental leave and retirement benefits ranges from 71% to 95%, with employment-injury and retirement protection showing the highest levels. Latin America similarly displays very high coverage, with most categories reaching 95–100%, except unemployment benefits, which stands at 60%.

In EMEA, coverage remained high for sickness, employment injury and parental leave (78–83%), in line with the region's robust social security frameworks. Retirement coverage stood at 69%, reflecting local variations in mandatory pension arrangements.

In North America, statutory social protection schemes differ substantially from those in other regions. Many benefits assessed under ESRS S1 – such as sickness, unemployment, parental leave, employment injury and retirement – are not mandated by law and are instead provided through employer-sponsored plans, which are not included in ESRS statutory coverage reporting.

Overall, the data illustrates how regional legislative frameworks drive variations in social protection coverage, and how the Group supplements these through internal policies where relevant.

3.1.4.7 Targets and Metrics

EssilorLuxottica is conducting a global mapping of social dialogue and collective bargaining practices to understand existing practices, processes, employee needs and cultural differences across all countries where it operates. By identifying local best practices, the Group aims to establish global standards and later define harmonization targets to ensure a consistent and effective approach to social dialogue, collective bargaining and freedom of association worldwide.

Metrics

Employees covered by collective bargaining per region

The regional coverage percentages reflect customary local practices in collective bargaining, shaped by each area's regulatory framework, unionization levels and collective bargaining traditions.

	2025	2024
TOTAL EMPLOYEES	41%	39%
North America	1%	1%
EMEA	64%	59%
Asia-Pacific	50%	47%
Latin America	33%	37%

Note: The figures for the EssilorLuxottica workforce refer to December 31 of each year. In this scope, joint ventures and agency workers are excluded, focusing solely on employees. The baseline is consistent with other breakdowns in the section. The percentage of collective bargaining specific to the EEA area, within the EMEA region, amounts to 79% employee coverage. The coverage percentages by region are consistent with local practices and standards related to collective bargaining. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

3.1.5 Talent Management and Development

3.1.5.1 Introduction

At the very core of EssilorLuxottica are its people. They bring its assets to life and are the key drivers of its success. Based on the principle that everyone's talent makes a difference, EssilorLuxottica recruits and engages its employees with a long-term perspective in which education, development and equal opportunities for everyone play a core role throughout the employee's career.

3.1.5.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG Topic	IRO name	Policy	Main Actions	Target/Metric
Talent Management and Development	Employees' personal and professional growth	• Code of Ethics • Global DE&I Policy • Global Policy on Anti-Harassment and Discrimination • Global Policy on Onboarding • Global Policy on Performance Management, Succession Plan and Development • Global Procedure on Talent Acquisition • Global Policy on Employer Branding and Talent Attraction • Global Policy on Salary Review	• Global process collecting nominations to participate in global programs and initiatives and delivery of development offering • Scope extension of Performance Management process • Process adoption support and implementation of change management activities • Succession Planning framework cascading	• Employees engaged in global talent development initiatives and programs • Employees worldwide participating in the performance evaluation process • Total hours of education and training delivered

3.1.5.3 Policies

Aside from the Code of Ethics and SpeakUp, all other policies listed below reaffirm the Company's commitment to conducting its activities in full compliance with legal requirements at both international and local levels. The policies aim to safeguard Human Rights and promote principles established by international organizations, including the 2030 Agenda for Sustainable Development and its related Sustainable Development Goals (SDGs), the United Nations Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organization (ILO) and the OECD Guidelines. All these policies were developed with the support of technical experts and in collaboration with local HR teams to ensure compliance with local legislation and alignment with the needs of all regions.

Internal policies are accessible to employees via the Company intranet or can be provided upon request to the HR Admin. The Chief People Officer and their direct reports are ultimately responsible for ensuring the proper implementation of all HR policies.

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies.*

Document	Function	Scope	Availability
Code of Ethics	Compliance	Own operations	Public
Global Diversity, Equity & Inclusion Policy	Human Resources	Own operations	Public
Global Policy on Anti-Harassment and Discrimination	Human Resources	Own operations	Internal
Global Policy on Onboarding	Human Resources	Own operations	Internal
Global Policy on Performance Management, Succession Plan and Development	Human Resources	Own operations	Internal
Global Procedure on Talent Acquisition	Human Resources	Own operations	Internal
Global Policy on Employer Branding and Talent Attraction	Human Resources	Own operations	Internal
Global Policy on Salary Review	Human Resources	Own operations	Internal

3.1.5.4 Processes for engaging with own workers and workers' representatives

EssilorLuxottica leverages multiple engagement channels to ensure seamless and ongoing communication with its employees. Alongside regular internal communication through local HR Business Partners, in 2025, the second global corporate culture survey, Your Voice, was launched. Additionally, the Company continued to expand the scope of its performance management process, OnePerformance, designed to ensure regular feedback. All of this is driven by its five shared Values, which shape the unified corporate culture of the Group. In particular, EssilorLuxottica's Competency Model has been developed in alignment with these five Company Values and defines the competences to grow and succeed at EssilorLuxottica. Complementing this, OnePerformance reinforces employee engagement by allowing them to set clear objectives, share expectations and deliver meaningful feedback. It recognizes achievements, celebrates individual contributions and emphasizes development opportunities.

As explained in the Talent Management and Development section below, Company Values and competencies have been infused in all key HR processes in the organization, from performance management to development initiatives to employee listening campaigns.

3.1.5.5 Actions and Resources

At EssilorLuxottica, nurturing talent remains a top priority. In 2025, the Company continued to enhance the global development initiatives while broadening participation across regional programs, each designed to support growth and career advancement. For high-potential talents and successors, opportunities include global and regional mentorship programs, comprehensive leadership development initiatives, international job rotations, personalized leadership coaching and capability assessment tools. These efforts are complemented by unique opportunities to learn directly from the Group's most senior leaders, fostering a culture of continuous growth and leadership excellence.

Talent Development

EssilorLuxottica aims to create a continuous learning culture and further dial up the leadership skills rooted in its five Company Values (as detailed in 3.1.2.4 *Processes for engaging with own workers and workers' representatives* – EssilorLuxottica's Values and Cultural Framework) and the 15 associated competencies that define success within the Company.

The EssilorLuxottica Competency Model outlines the behaviors that bring these values to life: for each Value, three leadership behaviors are identified and described in detail as they relate to organizational competencies.

Drawing on both the Values and the Competency Model, a Competency Hub has been launched on Leonardo for all employees: a new dedicated learning resource that helps employees at every level to reach their full potential and further develop critical competencies, in alignment with the Values.

Other development initiatives include global and regional mentorship, leadership capability assessment tools and individual leadership coaching to help unlock talents' potential and further boost their performance and growth, as well as virtual coffee chats with EssilorLuxottica leaders to learn from and be inspired by their experience.

In addition, future leaders are offered international job rotations and six-month leadership development programs, such as i) Enable, dedicated to emerging talents, ii) Empower, dedicated to middle manager talents and iii) Advance, dedicated to functional leaders.

Committed to fostering gender balance at all levels of the organization, as well as retention and career development, two programs dedicated to female talent have been launched: EmpowerHER for middle managers and AdvanceHER for functional leaders.

Global Talent Initiatives and Programs involved over 1,500 talents in 2025, in line with 2024 and previous editions, giving large exposure to talents coming from all geographies, different Business Units and Functions and across different levels. The impact of leadership development goes beyond participation in Global Programs and is complemented by a wide variety of local and regional initiatives.

One of those initiatives is Future Makers for Leaders, initially kicked off in 2023 with about 25 participants in the Manufacturing function only, dedicated to select middle manager profiles across EMEA Operations, and designed to reinforce competencies essential to become a leader of the future, including managing change, managing stakeholders and effective management of teams. In 2025, 54 employees were selected to attend the program, reflecting a steady increase in participation since its launch.

Talent Management and Development

Since 2023, a unified and consistent approach to performance mmanagement, known as OnePerformance, has been rolled out across the organization, reaching around 63,000 employees worldwide in 2025, while continuing to work on its expansion in other entities and countries.

OnePerformance focuses on two key elements: the "WHAT", achievements related to business goals, which are cascaded from Company and Functional priorities, and the "HOW", the expected behaviors as per the Competency Model.

At the beginning of the year, the process kicks off with the "Goal Setting and Continuous Feedback" phase, where employees and managers agree on individual goals aligned with Company and functional priorities.

Throughout the year, continuous feedback takes place as an ongoing, agile conversation between managers and employees, aimed at guiding, supporting and redirecting performance in real time. These exchanges can occur at any moment, ensuring that the process remains dynamic, continuous and embedded in everyday work.

The process then moves to the "Self and Manager Evaluation" phase, which happens at the end of the year. In this stage, employees are highly encouraged to evaluate their own performance to raise their self-awareness around their strengths and barriers and where managers evaluate the "what" and "how" dimensions and provide an overall evaluation.

Once the evaluation is completed, the resulting ratings are reviewed during the "Talent Discussion" phase, where functional managers and their direct reports discuss the performance and identify development and career opportunities.

The calibrated ratings are shared with employees by their managers during the "Performance Conversation" phase. This phase is designed to foster a constructive conversation around performance, strengths, improvement areas and career aspirations.

The process ends with the "Employee sign-off" phase, where employees can see the final evaluation and can sign-off the form to confirm receipt after the feedback conversation and track additional comments after the "Performance Conversation". This phase ensures full alignment and transparency.

The performance management process plays a pivotal role in determining pay and rewards. It aims to create a powerful tool for employees to excel, contribute to the Company's success, retain top talent, enhance motivation and engagement, boost productivity and foster a culture of continuous improvement. The Global Salary Review policy is founded on the principle of pay-for-performance, meaning employees are rewarded based on their individual achievements (please refer to Section 3.1.2.6 *Actions and Resources* for more details).

Moreover, both the performance management and succession planning processes serve as the foundation for identifying development needs, which are the basis for designing effective skills development programs.

Indeed, a global succession plan framework allows internal candidates to be identified who are ready to advance within the organization, ensuring continuity in the critical roles and strengthening the Group's future leadership pipeline.

Succession readiness is assessed across three levels:

- Ready Now: employees fully prepared to assume the incumbent's role as it is currently structured;
- Ready in 1-2 Years: employees who, with targeted development and resources, will be prepared to step into the incumbent's role as it is currently structured within 1-2 years;
- Ready in 3-5 Years: employees who require further development to be prepared for the incumbent's role as it is currently structured within 3-5 years. Alternatively, the role may need redesigning to reduce complexity for an earlier transition.

Specific dashboards on gender representation in performance evaluations and succession planning are updated and shared among Human Resources communities and leaders. By so doing, potential biases in these processes are immediately identified, supporting the development of action plans that ensure fairness and equal treatment across the organization.

Talent Attraction and Employer Branding

To make the candidate journey more seamless and coherent, the Company has introduced several initiatives to strengthen its visibility and engagement with potential candidates. A carefully crafted LinkedIn editorial plan raises awareness about the EVP (Employee Value Proposition), while a revamped careers page reflects the Group's Values and highlights professional growth opportunities. Together, these tools ensure a consistent and compelling experience for candidates, positioning EssilorLuxottica as an employer of choice.

The Group's talent attraction strategy is built on three strategic pillars:

1. **Creating a solid talent pipeline** to ensure the availability of talent for critical roles;
2. **Ensuring diversity**, with a focus on building inclusive teams that reflect the Company's global presence;
3. **Acquiring and developing the critical skills** needed for the Company's success in a fast-changing environment.

EssilorLuxottica continues to invest in partnerships with top-ranking universities and business schools worldwide, including MIT, Harvard, NYU, Columbia University, HEC, ESADE, Bocconi University, Politecnico di Milano, Fudan, PolyU Hong Kong and Tianjin Medical University. These collaborations involve participation in careers events, hosting of information sessions and engagement of students through real case studies. Partnerships like CEMS (an alliance of over 30 business schools worldwide) and associations such as AEBG (Alliance of European Business Games) further demonstrate the Company's commitment to fostering emerging talent.

In 2025, the Group launched Universe, a one-day, mono-brand event featuring an engaging agenda with thought leaders and brand representatives, delivering a comma after seamless immersive and gamified EssilorLuxottica experience. Universe aims to position EssilorLuxottica as an attractive employer within the med-tech industry worldwide for early talent, leveraging a cohesive global format and maximizing the impact of a strong communication plan.

From cutting-edge optical innovations to connected devices, the aim is to ignite curiosity and create impactful learning moments. The roadshow in the world's leading universities started in 2025 and will continue during the 2026 academic year, targeting Bachelor's, Master's and PhD students and recent candidates in the Economics (finance, marketing, business, etc.) and STEM fields (engineering, data science, IT, etc.).

In 2025, EssilorLuxottica also partnered with Women in Tech Global, an organization dedicated to closing the gender gap and empowering women to embrace technology, with the aim of making it more attractive to female profiles with a background in STEM disciplines.

To support its Talent Acquisition activities, global training for both recruiters and hiring managers has been introduced on the Leonardo learning platform: "The Talent Acquisition Process at EssilorLuxottica". This course takes an in-depth look at the different stages of the Group's Talent Acquisition process, showing how to ensure a fair, bias-free approach that reflects the Group's Values and Competency Model every step of the way.

EssilorLuxottica's commitment to education and talent development is also exemplified through its flagship program, the Operations Talent Program (OTP) – a two-year development path tailored to new graduates in the STEM fields, equipping them with the essential skills they need to thrive in EssilorLuxottica's operations. Initially launched in Agordo (Italy) and Créteil (France), the program expanded globally in 2025 to include Thailand, China, Brazil and the United States. This latest edition featured a focus on Digital Transformation and the selection of candidates specialized in Artificial Intelligence, Computer Science, Mathematics, Engineering and Telecommunications. With a continued commitment to diversity, the 2025 cohort achieves full gender balance with 50% women participation. The OTP remains a cornerstone of EssilorLuxottica's strategy to build an international pipeline of future operational leaders.

Through these combined efforts, EssilorLuxottica strengthens its ability to attract, develop and retain top talent. By investing in both external partnerships and internal engagement, the Group creates a dynamic and inclusive environment where individuals thrive and contribute to its ongoing success.

Accessible Education through Leonardo, the Group's Learning Ecosystem

Leonardo, EssilorLuxottica's open learning ecosystem, offers expert-curated content that can be tailored to learners' needs, fostering a true learning organization where EssilorLuxottica experts actively contribute to content creation by sharing their knowledge and experience, while also benefiting from the input of renowned external experts – particularly in the field of vision care, including medical and clinical topics. It has been designed to be accessible for every member of the eyewear and vision care community across the world. It addresses EssilorLuxottica employees and customers, as well as eyecare professionals at every level and in every role, offering them the opportunity to continuously expand their skills, knowledge and mindset. With this broad "unlocking" of knowledge, EssilorLuxottica makes an investment that represents one of the levers used to help unravel the potential of the industry.

Since its launch in 2021, Leonardo has delivered over 12.7 million hours of education in up to 35 languages, becoming a key tool for attracting and retaining resources.

In 2025, AI-powered translations have been introduced, allowing a 50% reduction in time-to-market for videos – in fact, in the first half of the year, 3,000 modules were translated, compared to a total of 4,400 modules in the whole of 2024.

Among the 35 languages currently managed, seven new ones were introduced this year and translations in others were expanded thanks to AI-powered translations. These include Hindi, Nordic languages, Ukrainian, Greek and Hebrew. The ongoing expansion of language availability helps Leonardo strengthen its global presence, reaching and engaging a broader and more diverse audience worldwide.

Leonardo uses a blended approach to education, combining on-demand content with live sessions and both virtual and face-to-face classes. The success of this methodology is proven by the high engagement of learners across the world: since its launch, over 90,000 live sessions with more than 4.8 million participants have been delivered.

In 2025, Leonardo further strengthened its educational offering by introducing new structured programs focused on key areas of expertise, including *Frame Shape and Style Advisor, Medical Billing and Coding* and a renewed version of the Ray-Ban Expert programs.

In addition, with the launch of new product categories such as hearing aid technologies and AI glasses, Leonardo supported the development of dedicated programs for these innovations with the objective of delivering training on key product features, providing demo and selling tips to support store associates. For example, *Nuance Audio Certificate Program for Hearing Solutions* and *Inside the Innovative World of Smart Eyewear, Ray-Ban Meta AI Glasses and Oakley Meta AI Glasses*, a deep-dive into the cutting-edge world of smart eyewear.

Among the key novelties released during the year, it is worth highlighting the expansion of the Vision Care offering, which included new category training courses and educational content to support the launch of new lens technologies, such as Varilux® Physio® extensee™.

Leonardo's Vision Care content portfolio also aims to train staff in the practice and to disseminate knowledge on scientific evidence behind refractive errors. To this end, Leonardo partnered with the WCPOS (World Society of Paediatric Ophthalmology and Strabismus) to create a series of masterclasses featuring renowned professionals sharing their expertise in diagnosing and managing progressive myopia.

Additionally, Leonardo provided key highlights from major congresses, including the IMC (International Myopia Conference), featuring contributions from the EssilorLuxottica R&D team and global experts on myopia and its management, and the WCPOS, where the Group presented the latest research findings on Essilor Stellest lenses.

Moreover, its continuous commitment to learners has been solidified with a robust partnership with Harvard Business Publishing, enhancing the platform's management and leadership-related content with a selection of curated courses to enrich both personal and professional skills.

Moreover, the roll-out of the Onboarding Program for EssilorLuxottica new hires has now been released in more than 300 customized versions, tailored to new hires based on their respective working areas.

To reinforce the connection with learners and foster a sense of community globally, Leonardo organized global live events open to all EssilorLuxottica employees and partners to celebrate industry or globally renowned international days throughout 2025, marking an exclusive and unique service available only on Leonardo.

With this same objective, Leonardo introduced *Leonardo In Conversation*, a format designed to foster exploration, dialogue and inspiration through open and insightful conversations with both internal and external experts, delving into key topics shaping the optical world – from vision and fashion to technology.

Every month, a new session is organized and available for all EssilorLuxottica employees, offering either a cross-disciplinary perspective or a deep-dive into a specific theme, encouraging the exchange of ideas and promoting knowledge as a driver of industry growth.

Based on the experience gained in previous years, Leonardo has continued the roll-out of the Build Your Career path in several countries. Build Your Career is the ultimate section designed to help independent practitioners to upskill their staff and strengthen their knowledge in order to be recognized by patients as trusted optical practice members. This section offers structured programs that accompany staff in their personal and professional development, whether they are new to the industry or experienced professionals.

Sustainability-related topics in general are part of the engaging portfolio offered by Leonardo from which employees can retrieve material to increase their awareness. Indeed, the hours of education on sustainability topics delivered in 2025 represent around 12% of the total hours delivered on the platform to employees.

In 2025, the adoption of Leonardo grew strongly: 4.2 million hours of education have been delivered to employees and external networks, which represents a growth of +24% compared with 2024[(1)]. 25,149 live sessions have been organized with the participation of over 1.9 million people, reaching a total number of 95,967 sessions since the launch and a total number of over 5.3 million participants.

(1) *The 4.2 million hours delivered in Leonardo represent the total reach across the full target audience perimeter, including external networks – both in Professional Solutions and among optical students and stores. In contrast, the hours shown in the table "Hours of education and number of employees educated" reflect only internal adoption, covering the entire EssilorLuxottica employee network, and are comprehensive of centrally managed Leonardo education.*

Hours of Education and Number of Employees Educated

	2025	2024
TOTAL HOURS OF EDUCATION DELIVERED TO EMPLOYEES	3,029,843	2,591,361
Number of trainees	151,389	144,649

Note: In 2025, a total of 3 million hours of education were centrally managed and provided to Group's employees globally through Leonardo, reporting a 14.5% increase compared to 2024. Among the most significant factors that led to the increase are the education programs designed to support the innovation of EssilorLuxottica's product and solutions portfolio, and in particular the brand and category content related to the wearables and med-tech world, with the launch of training programs focused on products and solutions in the hearing segment. Over 150,000 employees were educated through Leonardo, marking a 4% increase compared to 2024. In 2025, the Group introduced a new process to centralize all training data within a single system: Leonardo. The roll-out of this enhanced process began mid-2025 with regard to locally managed training. To preserve data reliability and year-on-year comparability, only centrally managed training has been included in the 2025 reporting scope. The full process will be fully operational for the 2026 reporting cycle, with regular monitoring in place to ensure completeness, quality and consistency across all entities. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

3.1.5.6 Targets and Metrics

With the objective of further increasing effectiveness and transparency when measuring the impact of its people initiatives over time, EssilorLuxottica is progressively strengthening its analytical and governance capabilities through the following Talent project streams:

- design of a Global Job Architecture, aimed at ensuring consistent tracking of roles, competencies and career paths across the organization;
- definition of organizational dimensions, to enhance granularity and comparability of talent data across regions and functions;
- enhancement of HR systems and analytics, to enable more accurate measurement of outcomes and impact.

Some of these initiatives are already underway, while others are currently being designed or planned for phased implementation. Together, they represent a key step toward a more data-driven approach to people management, enabling EssilorLuxottica to better assess the effectiveness of its talent strategies, monitor progress toward inclusion and growth objectives and continuously strengthen its global impact.

At the same time, the Company already pursues continuous improvement and monitors the impact of its actions using defined metrics, as detailed so far and further described in the following section:

- Talent management: the 2025 OnePerformance cycle expanded its scope by 13% compared to 2024, involving around 63,000 employees. As of December 31, 2025, the global goal-setting completion rate for 2025 was at 94%, surpassing the 2023 rate by 5%. In the future, EssilorLuxottica is committed to enlarging the number of employees involved in the Performance Management process year on year;
- Talent development: global talent initiatives engaged over 1,500 individuals worldwide, consistent with 2024, driving diversity and growth. In the future, EssilorLuxottica aims to increase the number of employees involved in the Global Development initiatives year on year;
- Talent attraction: the 2025 international Operations Talent Program (OTP) cohort achieved full gender balance with 50% women participation;
- Leonardo and education:
  - 3 million hours of education have been delivered to employees, which represents a growth of +14.5% compared with 2024,
  - education offered in 35 languages, including seven new languages introduced in 2025 thanks to AI-powered translations,
  - roll-out of the Onboarding Program for EssilorLuxottica employees, released in more than 300 customized versions.

3.1.6 Diversity, Equity & Inclusion

3.1.6.1 Introduction

With a presence in over 150 countries, the Group proudly reflects a global community, enriched by a variety of cultures, identities, languages and backgrounds.

EssilorLuxottica is fiercely dedicated to fostering an inclusive environment where every employee feels valued, supported and inspired in their professional journey. The Group ensures equal pay for equal work, free from distinctions based on race, gender, age, nationality, religion, sexual orientation, political views, marital status, union membership or disability. Guided by its Code of Ethics, EssilorLuxottica strictly prohibits discrimination, harassment or intimidation of any kind.

The Company prioritizes cultivating a diverse and inclusive workplace where individual perspectives and respected and diverse viewpoints are encouraged. Career opportunities and advancements are determined through a lens of fairness and meritocracy.

3.1.6.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG topic	IRO name	Policy	Main actions	Target/Metric
Diversity, Equity and Inclusion	Efficiencies related to promoting a diverse and inclusive environment	• Code of Ethics • Global Diversity, Equity and Inclusion (DE&I) Policy • SpeakUp platform + Group Reporting Policy • Global Policy on Anti-harassment and Discrimination • Global Policy on Salary Review	• Five Awareness and Learning initiatives in 2025 to spread knowledge across the organization • Enforcing a set of policies across the group • Constant monitoring of data in key HR processes (gender pay gap, gender distribution at different levels of the organization, participation in development programs, leadership pipeline in succession planning)	• 40% women in leadership roles by 2029 (Rixain Law) • 50% women in leadership programs in 2026 • For 2026, provide a dedicated module on DE&I topics to the CEO and Deputy CEO first line

3.1.6.3 Policies and processes

At EssilorLuxottica, building an inclusive work culture through diversity is of utmost importance and reflects the Company Value "We are one, thanks to many". Its Global Diversity, Equity and Inclusion (DE&I) strategy aims to ensure a workplace where all Group employees feel welcome and valued, and can express their full potential. In this respect, awareness campaigns, inclusive processes and policies and the development of clear goals are key levers as well as the integration of DE&I principles into key stages of the employee lifecycle.

The Group has established internal policies and procedures covering DE&I, Anti-harassment and Discrimination, Parenthood, Talent Acquisition, Employer Branding and Talent Attraction, Onboarding, Performance Management and Development, as well as Well-being and Engagement.

These policies reaffirm the Company's commitment to conducting its activities in full compliance with legal requirements at both international and local levels, such as the United Nations Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organization (ILO) and the OECD Guidelines. All these policies were developed with the support of technical experts and in collaboration with local HR teams to ensure compliance with local legislation and alignment with the needs of all regions. Internal policies are accessible to employees via the Company intranet or can be provided upon request to the HR Admin. The Chief People Officer and their direct reports are ultimately responsible for ensuring the proper implementation of all HR policies.

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies*.

Document	Function	Scope	Availability
Code of Ethics	Compliance	Own operations	Public
SpeakUp platform + Group Reporting Policy	Compliance/ Human Resources	Value chain	Public
Global Diversity, Equity and Inclusion (DE&I) Policy	Human Resources	Own operations	Public
Global Policy on Anti-harassment and Discrimination	Human Resources	Own operations	Internal
Global Policy on Salary Review	Human Resources	Own operations	Internal
Global Parenthood Policy	Human Resources	Own operations	Internal

Inclusion Committee

In 2024, EssilorLuxottica established an Inclusion Committee to champion diversity, equity and inclusion across the organization. Throughout 2025, the Committee continued to meet regularly, reinforcing the Company's ongoing commitment to advancing Diversity, Equity and Inclusion.

The Committee brings together key Company leaders from various business functions, regions and organizational levels to ensure diverse perspectives and provide essential governance, guidance and advocacy on a regular basis.

Its main responsibilities are:

- Awareness and Accountability:

  Guide governance and accountability for DE&I initiatives, ensuring they reflect our Group's values and goals;
- Consultation:

  Drive discussions aimed at prioritizing and overseeing DE&I activities, contributing valuable ideas and perspectives thanks to the experience and expertise of Inclusion Committee members;
- Advocacy:

  Advocate and sponsor the DE&I program, driving change within EssilorLuxottica through active participation and support;
- Decision-Making:

  Contribute to decision-making processes that shape the DE&I program and its trajectory, fostering a culture of inclusion and belonging at all levels of the organization.

In 2025, the Inclusion Committee, which meets twice a year, reaffirmed its commitment to Diversity, Equity and Inclusion and sponsored the DE&I strategy.

The Committee reviewed and facilitated the sharing of regional DE&I best practices, assessed progress against the 2025 agenda and defined direction for 2026. This includes promoting participation in global initiatives to strengthen an inclusive culture and developing a dedicated awareness module for global leaders.

Employee training on non-discrimination policies and practices

Throughout the year, all regions (EMEA, North America, Latin America and APAC) organized workshops, training and awareness sessions on non-discrimination policies and practices, in alignment with the DE&I global agenda.

In 2025, in Italy, BRG Women Milano was established as a Business Resource Group dedicated to fostering a dynamic community of women and allies. In Brazil, affinity groups for the LGBTQ+ community and persons with disabilities were established in 2025 alongside existing gender and ethnic affinity groups. At the same time, across EMEA Retail, two new communities emerged under the Through Your Eyes campaign (a community for women across EMEA Retail to connect, share perspectives and reflect on diverse experiences):

- Through Your Eyes: Women – a network designed to bring women professionals together to connect, share perspectives and reflect on the diverse experiences and stages of a woman's journey;
- Through Your Eyes: LGBTQ+ – a supportive space created to encourage open dialogue, mutual understanding and solidarity among LGBTQ+ colleagues and allies.

Together, these communities embody EssilorLuxottica's commitment to empathy, inclusion and connection.

Furthermore, in North America, many employee-led initiatives and activations continued, including those sponsored and coordinated by the seven Business Resource Groups (BRGs) – notably EssilorLuxottica Women's Network, Kaleidoscope, Pride, Abilities, Generation Next, iChampion and Mil-Vets). The North America region also continued its long-standing partnerships with several professional and non-profit community organizations, including the Optical Women's Association, Disability:IN, Out & Equal, Latinos En Optometry, Black EyeCare Perspective and Disabled American Veterans.

In France, a series of awareness initiatives were organized. The Company also participated in the annual DuoDay event promoting the inclusion at work of people with disabilities.

The Company has also expanded its awareness campaign against sexism, holding workshops in July, September and December 2025 on production sites in France to strengthen its commitment to fairness and respect.

In Italy, in November, awareness sessions were held to prevent, recognize and address harassment and gender-based violence. These sessions were specifically aimed at all office and operations employees in Italy. Furthermore, an internal campaign was launched to raise internal awareness about violence against women in all its forms, and the HR Department received specific training on the topic.

Grievance and Whistleblowing mechanisms

EssilorLuxottica encourages a culture of dialogue and communication (Open-Door approach), and attaches particular importance to ensuring that all employees have the means to report unlawful behavior or breaches of the Code of Ethics or other HR-related global or local policies, preferably to their line manager and/or to the Human Resources department, or to the upper-level manager or HR. They can also address their concerns directly to the Compliance function.

When this does not seem possible, employees can use the Group's SpeakUp reporting tool, which is described in more detail in Sections 4.1.5.1 *SpeakUp reporting system* and 3.1.7.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns.*

3.1.6.4 Actions and Resources

Since 2022, the Global DE&I function has been shaping the Group's strategy, commitments and goals for Diversity, Equity and Inclusion. The strategy is built on three core pillars:

- Drive Internal & External Awareness by fostering a culture of inclusivity and belonging;
- Build & Evolve Inclusive Processes and Policies across the organization;
- Develop Clear, Measurable Goals by leveraging data and metrics.

Additionally, the awareness pillar includes dedicated training sessions to ensure that specific groups, such as leadership, HR and other relevant functions, are well-versed in diversity topics.

The Company is constantly working to integrate DE&I into key processes and policies to promote unbiased decision-making. In this respect, the Global DE&I Policy and the establishment of the Inclusion Committee in 2024 represented significant milestones.

To track progress with a data-driven approach, the Company measures targets and metrics through KPIs and dedicated internal dashboards to monitor different employees' characteristics such as, among others, gender, age and nationality.

Global DE&I Strategy

Awareness pillar

As part of the Company's strategy, the awareness pillar aims to foster more inclusive culture by enhancing the understanding of diversity. A global inclusion calendar features five key yearly moments with dedicated internal and external awareness-raising campaigns: International Women's Day, Mental Health Awareness Month, Pride Month, Diversity, Equity and Inclusion Week (centered on Connecting Perspectives) and the International Day of Persons with Disabilities.

These initiatives are developed in partnership with Corporate Sustainability, Corporate Communications, Leonardo and all EssilorLuxottica employees. In 2025, internationally renowned speakers and experts joined DE&I-focused virtual sessions and modules on the Leonardo platform, while local events were organized in Italy, France and other regions engaging the entire workforce through a mix of virtual and in-person events, workshops and the distribution of educational and awareness materials. These efforts fostered a deeper understanding among employees about unconscious bias, gender equality and the multifaceted nature of diversity in the workplace.

The 2025 Inclusion Calendar featured:

- International Women's Day (March)

  On March 8, the Group celebrates the accomplishments of women worldwide while raising awareness to advance gender equality.

  This year, under the theme "Together, we accelerate action" the Group hosted both global livestream events about women's achievements and challenges and local initiatives engaging employees worldwide.

- Mental Health Awareness Month (May)

  The stigma around mental health can lead to feelings of shame and isolation, preventing those experiencing these challenges from sharing their experiences openly or seeking the necessary support. In May, under the campaign "Let's talk about it" the Group shone a spotlight on the importance of mental health, with global livestream sessions and local awareness initiatives.

- Pride Month (June)

  In 2025, with the theme "Pride in being you", through global livestream events, the Group explored global perception of pride and individual journeys, and the importance of being able to be your true self. Many countries including Italy and France also hosted celebrations in offices, together with the brands and banners network.

- Diversity, Equity and Inclusion Week (October)

  EssilorLuxottica DE&I Week is a global celebration dedicated to exploring and embracing diverse perspectives that enrich our understanding throughout the year.

  The initiative, now in its third edition, focused on connecting perspectives and the impact technology can have on inclusion initiatives. Joined by a distinguished guest speaker, the global event explored the intersection of technology and inclusion, with a particular focus on Artificial Intelligence (AI).

- Training on Recognizing, Preventing and Tackling Harassment and Violence against Women (November)

  In recognition of the International Day for the Elimination of Violence against Women, the Group launched a special awareness session dedicated to all office and production employees in Italy on the topic "Recognizing, Preventing and Tackling Harassment and Gender-Based Violence". The session was also an opportunity to explain the Group's commitment to this topic and promote internal reporting tools.

- International Day for People with Disabilities (December)

  On December 3, the Company focused on breaking down prejudices around visible and invisible disabilities, with global and local initiatives, leveraging both livestream and in-person events.

DE&I Partnerships

During the year, two strategic partnerships were launched to strengthen the global attraction strategy and support the hiring of female talent in STEM. With Women in Tech Global, the world's leading organization empowering women in STEM, the collaboration includes EssilorLuxottica job postings on their platform, promotional campaigns for the Group's open positions and participation in a global women-focused event.

In parallel, the partnership with She Tech, an Italian non-profit dedicated to advancing women in the tech and digital fields, featured the Tech Drink networking event in Belluno (Italy) with three EssilorLuxottica female leaders sharing their career journeys, and will continue with the STEM Women's Recruiting Day in Agordo (Italy) in 2026, designed to connect talented women with career opportunities and foster community engagement.

Processes and Policies pillar

Following the launch of a Global DE&I Policy in 2024, EssilorLuxottica has introduced a set of policies embedding DE&I principles across the employee lifecycle – from hiring and onboarding to performance, well-being and engagement. These policies reinforce the Company's Value "We are one – thanks to many" and its commitment to human rights, ensuring an inclusive workplace where all employees feel valued and empowered.

Furthermore, in 2024, EssilorLuxottica Italy obtained the UNI PdR 125:2022 Gender Equality Certification, renewed in 2025, reaffirming the Group's dedication to advancing workplace gender equity. This nationally recognized standard evaluates organizations on measurable gender equality indicators, ensuring accountability and improvement in diversity and inclusion practices across all operations.

Also, in France in 2025, Essilor International obtained the Gender Equality European and International Standard (GEEIS) certification. GEEIS is an internationally recognized label enabling the implementation of inclusive policies and of a common culture on gender equality and diversity in the workplace.

Goals and Data pillars

This pillar is about monitoring diversity representation, mainly women's representation in leadership positions.

The Group is dedicated to fostering inclusivity across various dimensions of diversity with a holistic approach, ensuring that every individual feels respected and has a sense of belonging.

As outlined in the Global DE&I Policy, the Group is committed to gender equality by providing equal opportunities, fair pay and career advancement for all while supporting work-life balance through parental leave and policies that address gender-based discrimination and harassment. The Group nurtures a supportive environment for individuals of all gender identities and sexual orientations, promoting awareness, allyship and the removal of barriers through global and local initiatives.

Generational diversity is embraced as a driver of innovation, encouraging knowledge-sharing and collaboration across age groups through intergenerational dialogue, awareness initiatives and dedicated development programs. The Group also strives to include and support employees with disabilities by creating accessible workplaces and raising awareness of and promoting the elimination of social biases. In 2025, EssilorLuxottica conducted a dedicated pilot survey – limited to legal entities with more than 250 employees and only where permitted by local labor laws – covering approximately 147,000 employees. Within this scope, employees with a disability represented 3% of the workforce.

Also, awareness and respect for ethnic, cultural and religious diversity are integral to the Company's approach, supporting an environment where individuals feel recognized for their unique contributions.

Recognizing the diversity of its global workforce, EssilorLuxottica tailors its initiatives to the specific characteristics and legacies of each region. While maintaining a strong focus on gender equality, the Group also addresses other dimensions of diversity, in alignment with emerging needs.

3.1.6.5 Targets and Metrics

Targets

- 40% Women in Management and Senior Executive roles by 2029, in line with the Rixain Law (baseline 34% for Senior Executives and 35% for Management Bodies in 2024 – Rixain Law specific categories).
- 50% Women in Global Leadership Development Programs achieved in 2025, with the same target for 2026.
- For 2026, the target is to provide a dedicated module on DE&I topics to the CEO and Deputy CEO first line.

As at December 31, 2025, women represented 33% of the Management Bodies and 35% of Senior Executives (both categories contribute to the total Executives-Senior Management line in the table below)[1].

The composition of the Management Bodies encompasses the key global positions within Group Functions and Senior Business Leaders with extensive business responsibility. The list has evolved as a result of the ongoing integration effort and harmonization of the HR systems, which allowed greater uniformity and a higher quality of data. This process also entailed an internal global alignment on the most selective definition of Management Bodies within the Group, reflecting the continuous evolution of EssilorLuxottica and of the key global strategic positions needed to ensure its growth and success.

Senior Executives include employees who directly contribute to the definition of the Company strategy, who play roles with a high level of autonomy and decision-making power and who coordinate teams pursuing these objectives.

(1) *The Executives-Senior Management category includes Management Bodies and Senior Executive roles, with a more narrowly defined baseline to align with the requirements of the Rixain Law.*

The tables below present additional diversity metrics, such as gender distribution by job category and employee distribution by age group.

Metrics

Employee breakdown by category and gender

	2025		2024	
TOTAL NUMBER OF EMPLOYEES	201,176	100%	195,428	100%
EXECUTIVES – SENIOR MANAGEMENT	**2,782**	**1%**	**2,775**	**1%**
Women	967	35%	938	34%
Men	1,801	65%	1,829	66%
Unknown	13	-%	7	-%
Other	1	-%	1	-%
MANAGERS/EXPERTS – MIDDLE MANAGEMENT	**13,670**	**7%**	**12,933**	**7%**
Women	6,103	45%	5,669	44%
Men	7,500	55%	7,208	56%
Unknown	57	-%	45	-%
Other	10	-%	11	-%
PROFESSIONAL – WHITE COLLAR	**37,160**	**18%**	**37,881**	**19%**
Women	19,865	54%	20,437	54%
Men	17,107	46%	17,285	46%
Unknown	179	-%	148	-%
Other	9	-%	11	-%
PRODUCTION/SHOP STAFF – BLUE COLLAR	**147,564**	**73%**	**141,839**	**73%**
Women	93,290	63%	90,392	64%
Men	52,323	36%	49,803	35%
Unknown	1,915	1%	1,627	1%
Other	36	-%	17	-%

Note: The Group's job level categories remain consistent with those of 2024. Production/Shop staff (i.e., Blue Collar) represent 73% of the workforce, primarily in retail and operations. Females account for 45% of middle management, a slight increase compared to 2024. The proportion of females in Executive-Senior Management roles has also slightly increased from 34% to 35% in 2025, confirming the trend of the previous year. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

Head count by age group

	2025		2024	
TOTAL NUMBER OF EMPLOYEES	201,176	100%	195,428	100%
Below 18	530	-%	507	-%
Under 30	59,050	29%	56,574	29%
30-50 years old	108,092	54%	106,056	54%
Above 50	33,504	17%	32,291	17%

Note: EssilorLuxottica has a strong youth employment rate, with around 30% of employees under 30, primarily in facilities and stores. Overall, 83% of employees are under 50, and the average age is 38. For further information on reporting methodology and scope, please refer to Section 6 Methodology Note.

3.1.7 Human and Social Rights of Own Workforce

3.1.7.1 Introduction

As stated in the Code of Ethics, EssilorLuxottica is firmly committed to respecting human rights and labor rights of the people in its own workforce. EssilorLuxottica is an equal opportunities employer, for every employee at all levels, and pays employees equally for the same work, regardless of race, gender, age, nationality, religion, sexual or political orientation, marital status, union affiliation or disability. The Group does not tolerate any form of discrimination, intimidation or harassment. The Company is firmly committed to building a work culture that is inclusive and nurtures diversity to allow unique perspectives and novel ideas to flourish.

3.1.7.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG topic	IRO name	Policy	Main actions	Target/Metric
Human and Social Rights of Own Workforce	Potential inadequate Human Rights practices	• Code of Ethics	• SpeakUp reporting tool • Open-Door approach • Audits	• Number of allegations • Number of audits

3.1.7.3 Policies

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies.*

Document	Function	Scope	Availability
Code of Ethics	Compliance	Own operations	Public
Reporting (whistle -blowing) Policy	Compliance	Own operations and value chain	Public
EssilorLuxottica Responsible Sourcing and Manufacturing (ELRSM) program	Risk Management/ Sourcing & Procurement	Own operations & Upstream value chain	Internal
EssilorLuxottica Responsible Manufacturing Policy	Risk Management	Own operations	Internal

The Group's ethical commitment is in line with the provisions of the International Labor Organization (ILO) Core Conventions and the principles of United Nations Global Compact on Human Rights. The Company places particular importance on respect for human rights and the environment, along with applicable laws and regulations (e.g., 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 on Responsible Business Conduct. Generally speaking, EssilorLuxottica aims to ensure that its activities comply with the International Bill of Human Rights and the principles of the fundamental rights set out in the Declaration on Fundamental Principles and Rights at Work of the ILO.

EssilorLuxottica's Code of Ethics explicitly prohibits human trafficking, forced or compulsory labor and child labor, in any form whatsoever, in its operations. The provisions apply to all employees as well as temporary and agency workers. All forms of human trafficking during employment, either directly or through contractors, are strictly prohibited. In relation to child labor, the hiring of individuals below 16 years of age (or below the legal minimum age for employment in the applicable country or jurisdiction, whichever is higher) for work is strictly prohibited.

Exceptions apply to trainees and apprentices as part of their educational curriculum, reflecting the Group's commitment to the development of future talents. Hiring of individuals (either employees or temporary staff) below 18 years of age for positions involving hazardous work is also strictly prohibited. These categories of workers must be protected and EssilorLuxottica's policy ensures that they are not subject to long hours interfering with their education and that their tasks are strictly related to their education.

As detailed in the EssilorLuxottica Vigilance Plan (Section 2.3 *EssilorLuxottica Vigilance Plan* of the 2025 Universal Registration Document), the Group maintains a very high level of vigilance and proactivity, with action plans on, among other themes, human rights and business ethics. These include programs on anti-bribery and corruption and privacy compliance. The vigilance system is reinforced by the implementation of the internal reporting tool, SpeakUp, which is open and publicly accessible to employees and other stakeholders and allows the reporting of incidents related to human rights and labor rights – please refer to Section 3.1.7.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns* for more details.

3.1.7.4 Processes for engaging with own workers and workers' representatives

EssilorLuxottica constantly works to anticipate and manage actual and potential impacts on its workforce deriving from potential inadequate human rights practices that can damage the work environment and jeopardize the Group's reputation. For this reason, the Group gathers feedback from its workforce through several actions such as employee surveys and its internal reporting channel, using the insights to inform actions and procedures to address the issues raised.

Moreover, respecting local regulations, EssilorLuxottica acknowledges the value of engaging with Factory Committees and Trade Unions as an added dimension for sustainable business growth through participative means. As explained in Section 3.1.4 *Social Dialogue and Freedom of Association*, EssilorLuxottica regularly engages with employee representatives as per local applicable laws. Indeed, in France and Italy, the Code of Ethics was presented to works councils. From an operational perspective, Human Rights and labor-related policies and procedures are overseen by: the Human Resources, Compliance, Environment, Health & Safety and Global DE&I teams. In addition, a dedicated Human Rights procedure is in the process of being defined. More details can be found in the Sections 3.1.2 *Employee Engagement & Well-Being*, 3.1.3 *Health & Safety* and 3.1.6 *Diversity, Equity & Inclusion*.

3.1.7.5 Processes to remediate negative impacts and channels for own workforce to raise concerns

The CSR Committee is regularly updated on specific topics including the Double Materiality Assessment and management of sustainability issues. The CSR Committee also coordinates with the Audit and Risk Committee for all matters related to the CSR Committee's areas of intervention. In addition, the Environment, Health & Safety function at EssilorLuxottica is responsible for the deployment of environmental management systems aimed at reducing environmental impact and ensuring the Health & Safety of all employees worldwide.

EssilorLuxottica carries out its activities in more than 150 countries in multiple economic and sociocultural contexts, which may present risks relating to Human Rights and the environment. Identifying, assessing and managing these risks is an integral part of EssilorLuxottica's corporate culture and is strengthened over time. The Group assesses its risk exposure through the Group risk assessment process, which incorporates the identification and evaluation of ESG risks such as health & safety, and through specific programs that apply to both manufacturing sites and suppliers globally. Risk mapping has helped to raise awareness and prioritize action plans at corporate and regional levels. For each main risk family, the relevant functions involved coordinate the appropriate mitigation and management measures with a continuous improvement process.

The processes for providing or contributing to remediation of negative impacts include a whole set of corrective actions, either individual or general, such as:

- discussion with Human Resources and manager (or the upper-level manager) to discuss the matter in hand and recommended actions, proportionate to the negative impact;
- coaching and/or specific training of the employees involved;
- reminder of the applicable policies to the employees involved ("reset expectations");
- enhancement of the existing training for the exposed part of the workforce;
- review and enhance the policies and procedures, if necessary;
- interim measures such as suspension of an employee during investigation;
- internal reorganization such as change of department or assignment to a new store;
- disciplinary measures, from a verbal or formal warning, up to termination of employment.

Moreover, to prevent or mitigate material negative impacts on its own workforce, the Group has also put in place different types of audits, both internal and external, to ensure that appropriate working conditions are implemented in the different entities of the Group:

- Different audits are performed on a yearly basis by external auditors in the Group's major manufacturing sites and prescriptions laboratories. Group sites can be audited either as part of SMETA expectations or as part of the EssilorLuxottica Responsible Sourcing and Manufacturing (ELRSM) program. This program aims to verify the compliance of the Group's value chain (including own operations) with international standards, all applicable laws and regulations and the Group Code of Ethics. The ELRSM audit checklist is composed of four main sections, which refer to Labor & Human Rights (including among other topics working hours, wages and benefits, child and forced labor, freedom of association and collective bargaining), Occupational Health & Safety, Environment and Governance and Ethics. Each section is composed of multiple questions and there is clear evidence of those that are essential for EssilorLuxottica. Zero-tolerance criteria are clearly expressed (e.g., employment of children under 16 years of age, retention of workers' passports or other identification papers, working time systematically recorded, etc.);
- Internal audits on a wide range of topics (training, health & safety, etc.) are conducted both at operations/production site level and at store level depending on the audited topics and in accordance with the approved Audit Plan.

For both cases, audited sites are selected based on a risk assessment methodology that considers the following main criteria:

- country risk profile/external third-party index;
- headcount numbers;
- audit cycle/results of previous audits;
- internal control system: the Internal Audit Department and Risk Management Department conduct interviews with key stakeholders at corporate and local level to obtain a comprehensive understanding of the business context and associated risks;
- insights from the Enterprise Risk Management process.

After each audit, ad-hoc action plans are defined between the auditors and the relevant functions to correct the identified improvement points. In 2025, 24 audits have been performed covering around 20% of EssilorLuxottica's global headcount. Over the past three years, the assessment has covered 28% of the Group's headcount. Risks were identified in 14% of the total assessed operations, 100% of which have been addressed.

Moreover, EssilorLuxottica encourages a culture of dialogue and communication, and attaches particular importance to ensuring that all employees have the means to report ethical breaches. Given the size of the Group, its global footprint and the multiplicity of applicable regulations, several channels are in place for EssilorLuxottica's employees to raise concerns:

- Open-Door approach – the Group encourages employees to speak up to their manager, higher-level manager or the Human Resources department;
- Freedom of association – EssilorLuxottica respects the principles of freedom of association and collective bargaining. In several countries, the Group has works councils, unions or employee representatives to whom employees can raise concerns;
- Local grievance procedures – where applicable, some entities have written grievance procedures in place, for example via e-services on internal portals, or specific HR procedures, to handle allegations of discrimination, harassment or inclusion-related issues in the workplace that may be prescribed by local laws;
- SpeakUp reporting tool – employees can report concerns through the Group's SpeakUp reporting tool (more details below). Where applicable, like in North America, SpeakUp can also be used for grievance purposes notably for employees who want to report anonymously, outside of the e-service portal;
- External reporting (EU) – in the European Union, employees have the possibility, as an alternative to the internal Group reporting (whistleblowing) system, to raise their concerns to state-designated external agencies. Employees are informed of this possibility in the Group Reporting Policy.

The SpeakUp tool is hosted on a secure third-party vendor platform, which enables case management and tracking of incidents. All cases are identified with a case number, and several metrics can be tracked, including the case opening and closing dates, the date of the incident, any follow-up, and the case history (appointment of investigator, notifications sent, etc.). The system contains reporting and analytics features enabling detailed reports to be issued. All entities of the Group have been set up in the system and organized by region, so it is possible to obtain precise analytics by region and country.

EssilorLuxottica strives to comply with the timeframes set out in the Directive on the protection of whistleblowers, which are also clearly set out in the Reporting Policy. SpeakUp is being rolled out across Group entities – which may have diverse internal channels for reporting – thanks to both global (communication on the Group intranet and specific actions with key managers, distribution of FAQs) and local (specific deployment with subsidiaries, dedicated posters, digital animations, etc.) communication initiatives. Investigations are conducted by trained investigators at corporate and local level, with the support, as necessary, of relevant subject matter experts. The outcomes of the procedures comply with applicable laws and internationally recognized human rights, and disciplinary procedures, if necessary, must comply with applicable labor laws. More details can be found in Section 4.1.5.1 *SpeakUp reporting system*.

Throughout the SpeakUp process, EssilorLuxottica identifies insights that support continuous learning by both improving the channels and preventing future impacts. For example, the Compliance department continuously improves its investigator training, its investigation process and templates thanks to the experience acquired through the handling of cases, and a review of its Reporting policy is planned for 2026. As part of the actions to be taken further to the closing of a case, EssilorLuxottica adapts, reinforces or corrects gaps in the policies and procedures. For example, in 2025, discrimination and harassment prevention was reinforced with the publication of a new internal policy.

EssilorLuxottica determines the outcome of whistleblowing cases based on facts, as part of its management decision power, taking into account, wherever possible, the reasonable expectations of the reporters.

It is difficult to measure the effectiveness of SpeakUp using indicators. As SpeakUp was rolled out worldwide in 2024, with widespread communication, an increase in the number of cases was expected and has been achieved, particularly in regions where previous systems were not in place. In some regions, the system is more mature and employees are making extensive use of it. This trend continued in 2025. It is still too early to measure its effectiveness, but it is clear that it has revealed and corrected situations that are contrary to the Group's values.

In addition, the Group released a specific and detailed SpeakUp e-learning module available to all employees with access to the Leonardo platform, seeking to facilitate the reporting process with clear practical guidance. EssilorLuxottica has a non-retaliation policy that is clearly stated in its Reporting Policy, in the Code of Ethics and related training, on the SpeakUp posters displayed on the Group's premises and the Group's Diversity and Inclusion and Discrimination and Harassment policies.

Data privacy and data protection are priority action areas for the Group and it takes steps to comply with applicable regulations to help ensure the protection of data. Moreover, a privacy compliance program and training courses were created and dedicated functions support the business in implementing data protection where relevant. More details can be found in Section 3.4.3.6 *Actions and Resources*.

3.1.7.6 Actions and Resources

EssilorLuxottica attaches particular importance to identifying risks and preventing serious breaches of human rights and fundamental freedoms, health & safety at work (referred to below as "human rights"), as well as environmental harm. These risks may arise from the Group's activities, those of its subsidiaries or those of its suppliers and subcontractors, regardless of their position in the value chain. Identifying those risks entails a commitment to make every reasonable effort and undertake the necessary measures to guarantee compliance. Actual or potential violations of the duty of vigilance can be reported through the Group reporting system.

The Group responds proactively to risks related to potential Human Rights violations through initiatives designed to improve safeguards and reinforce the existing system. External and internal audits are performed on EssilorLuxottica's own operations. The topic is also covered in both the Group's Code of Ethics and the Business Partners' Code of Conduct.

Regular awareness-raising and training initiatives on human rights and compliance-related topics (Code of Ethics, personal data protection, Health & Safety policies, etc.) are delivered to employees through dedicated e-learning modules and face-to-face training. Training efforts continued in 2025, and the "Code of Ethics" training (launched in Q2 2024) was completed by a total of 30,382 active white collar employees as at December 31, 2025.

EssilorLuxottica also focuses on privacy and personal data training, and specific training was provided to specific functions that may impact the workforce, notably human resources, facility management or Asset Protection – please refer to Section 3.4.3.6 *Actions and Resources* for more details.

In 2025, EssilorLuxottica implemented the following actions to mitigate potential negative impacts of inadequate Human Rights practices:

- continued deployment of its Code of Ethics and the related training within the Group, covering all the areas of the Code of Ethics (including the SpeakUp platform and the Open-Door approach);
- deployment of the SpeakUp program;
- completion of corporate-level human rights salient risk mapping, based on the UNGP methodology, to consider human rights impacts across the value chain;
- ongoing drafting of the standalone Human Rights policy to ensure that the outcomes of the corporate-level human rights assessment are considered and integrated in the framework;
- engagement of the cross-functional Human Rights task force in shaping and enhancing human rights-related processes, in preparation for CS3D implementation;
- continued privacy training deployment, deploying the existing modules (general data protection course, HIPAA, etc.).

EssilorLuxottica takes seriously any gaps or issues that have an actual material impact on its workforce. Corrective actions are defined on a case-by-case basis to remedy the situation, which may include individual measures up to and including termination of employment, in accordance with applicable labor laws.

The key actions planned for 2026, and beyond, in relation to human rights and labor rights in the workforce are aligned with the upcoming CS3D implementation and refer to:

- integrating the findings of the corporate level human rights risk mapping to enhance the existing processes;
- drafting a more comprehensive Group Human Rights Policy and developing associated training;
- addressing the most salient human rights risks identified in the assessment and undertaking a deep-dive assessment, where needed;
- tracking the escalated incidents related to human rights and strengthening the grievance mechanism.

More information on the Group-wide Human Rights Risk Assessment is available in the EssilorLuxottica Vigilance Plan (Section 2.3 *EssilorLuxottica Vigilance Plan* of the 2025 Universal Registration Document).

3.1.7.7 Metrics and Targets

The setting of quantitative targets is considered not applicable for this topic.

In 2025, EssilorLuxottica received 470 allegations of discrimination, harassment and/or bullying and sexual harassment in its internal reporting channel SpeakUp. The vast majority of such allegations were related to daily employee relations in the workplace, often including misunderstanding or miscommunication issues. At the date of this report, 105 of these allegations were substantiated and 68 were found partially substantiated, for example when an allegation may not strictly be qualified as discrimination or harassment, but it is still a violation of the Group's Values or Code of Ethics.

In total, the Group received 1,433 allegations in SpeakUp in 2025. This number is a 19.8% increase compared to 2024, due to the continuous roll-out, notably in regions including entities where the system was recently rolled out, where a significant increase in system use was noted. None of these allegations had any significant financial consequences for the Group.

In addition, 307 allegations of discrimination and harassment were received in the HR channels and 72 of these cases were found substantiated. The amount of fines and penalties related to these cases is not material.

In 2025, EssilorLuxottica did not record any complaints filed with the OECD or any severe Human Rights issues and incidents connected to its own workforce that are cases of non-respect of the UN Guiding Principles or the OECD Guidelines. Indeed, to the best of EssilorLuxottica's knowledge, no severe Human Rights issues or incidents have occurred and there have been no related fines or penalties.

3.2 ESRS S2 – Workers in the Value Chain

3.2.1 Introduction

As a vertically integrated company, EssilorLuxottica manages a comprehensive and global supply chain, aiming to lead by example within the eyecare and eyewear industry. The Group bases its success on the proper consideration of local impacts, dialogue with stakeholders and the creation of shared value with business partners, suppliers, governments and local communities. The establishment of EssilorLuxottica sites contributes to local socio-economic development by creating meaningful employment opportunities in a buoyant sector and generates significant direct and indirect income.

The Group Business Partners' Code of Conduct is shared with all business partners as part of contractual agreements or in the general terms and conditions attached to the purchase order, making it a solid base for fair and honest collaboration. EssilorLuxottica seeks to work with suppliers whose operational practices comply with applicable laws and regulations and, more generally, that protect the human rights and working conditions of workers, and the environment at large.

This section provides an overview of policies, actions, metrics and targets to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities related to the workers in the value chain.

3.2.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG topic	IRO name	Policy	Main actions	Target/Metric
Working conditions and Human Rights in the value chain & Equal treatment and opportunities for all	Inappropriate working conditions, unequal treatment and Human Rights practices for business partners' employees	• Business Partners' Code of Conduct • Code of Ethics • EssilorLuxottica Responsible Sourcing & Manufacturing (ELRSM) program • Group Direct Sourcing Policy • Group Indirect Procurement Policy	• Suppliers' risk assessments and sustainability evaluations • Suppliers' on-site audits • Supplier training and capacity building • SpeakUp reporting system available to third parties	• Number of Tier 1 suppliers • Number of significant Tier 1 suppliers • Number of Tier 1 supplier audits • Number of Tier 1 suppliers assessed on risks and sustainability
	Collaborating with business partners not aligned with EssilorLuxottica's ethical principles and standards			• Number of supplier audits with critical non-conformities • Number of supplier training participants • Number of phased-out suppliers

EssilorLuxottica's commitment to responsible sourcing ensures that the material impacts of its operations across all sectors of its value chain are addressed. The Group recognizes that there may be high-risk supply chains in the eyecare and eyewear industry, as well as in apparel manufacturing, particularly manual labor-intensive processes, that require focused attention to safeguard the workers involved. These industries can be linked to systemic labor rights challenges, including forced labor, child labor, poor working and health & safety conditions and low wages. EssilorLuxottica commits to ensuring that all workers potentially impacted by its operations are included in its disclosure. Through the Eyes on Ethics pillar of its sustainability program and the Responsible Sourcing program, the Company actively works with its suppliers and business partners to manage labor risks and ensure that workers' rights are upheld.

More precisely:

- Third-party contractors' workers in the Group's facilities can be impacted by its operations. These workers include those engaged in manufacturing sites, security and cleaning services and temporary or seasonal labor. The Group ensures these workers are covered under the Code of Ethics and labor policies, ensuring fair treatment and adherence to worker welfare standards;
- EssilorLuxottica also pays close attention to the apparel, footwear and accessories (AFA) and Wearables supply chains. EssilorLuxottica works closely with suppliers to ensure sustainability risks are mitigated, applying due diligence and ethical certification standards to ensure that the extraction and processing of materials meet human rights and environmental sustainability standards.

As detailed in Sections 4.1.5.1 *SpeakUp reporting system* and 3.1.7.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns*, the Group has implemented specific initiatives to protect workers' rights, such as the SpeakUp reporting system, which includes the possibility for business partners to report violations of the Code of Conduct anonymously and confidentially to EssilorLuxottica. This includes workers that may be at a higher risk of exploitation due to their inherent characteristics or particular circumstances (e.g., migrant workers, women, young workers, home workers and trade unionists).

In several geographies across Asia and Central America, the upstream apparel supply chain is exposed to sustainability risks related to labor rights, working conditions and occupational health and safety, including potential child or forced labor. In key cotton-sourcing regions and textile and garment manufacturing hubs in Asia, issues such as excessive overtime and workplace health and safety concerns may also arise. Across key Asian manufacturing hubs, the wearables supply chain, as part of consumer electronics, may be also exposed to sustainability risks, especially concerning labor rights, working conditions and occupational health and safety. EssilorLuxottica works to eliminate these risks through supplier risk screening and sustainability assessments, on-site responsible sourcing audits conducted by independent third-party auditors, certification programs and collaborations with sustainable business networks focused on preventing environmental and human rights violations in the supply chain.

3.2.3 Policies and Engagement

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies*.

Document	Function	Scope	Availability
Business Partners' Code of Conduct	Compliance/Sourcing & Procurement	Upstream and downstream	Public
Code of Ethics	Compliance	Own operations	Public
EssilorLuxottica Responsible Sourcing and Manufacturing (ELRSM) program	Risk Management / Sourcing & Procurement	Own operations & Upstream value chain	Internal
Group Direct Sourcing Policy	Sourcing & Procurement	Own operations & Upstream value chain	Internal
Group Indirect Procurement Policy	Sourcing & Procurement	Own operations & Upstream value chain	Internal

EssilorLuxottica prevention of human trafficking, forced labor or compulsory labor and child labor

EssilorLuxottica is committed to combating any form of slavery or human trafficking. The Group has zero tolerance for forced labor, including unlawful child labor, in its own operations and in its supply chain.

As outlined in its Business Partners' Code of Conduct, EssilorLuxottica requests its Business Partners to prevent and seek to eliminate any form of forced or compulsory labor, including child labor, in employment, as defined by ILO standards, and to require the same from their own contractors and subcontractors. Business Partners must safeguard and prevent infringement of domestic and migrant workers' fundamental rights and provide them with fair and decent working 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. Besides, 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, 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. Besides, 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.

EssilorLuxottica Responsible Sourcing and Manufacturing (ELRSM) program

EssilorLuxottica is committed to respecting and promoting Human Rights across all its operations and throughout its supply chain. Business Partners are expected to uphold the human rights and labor rights of their workers and seek to comply with all applicable Human Rights and labor-related laws and conventions.

According to its Business Partners' Code of Conduct, EssilorLuxottica conducts risk-based due diligence and background checks on its Business Partners and may require them to undergo self-assessment questionnaires and/or on-site responsible sourcing audits, performed either directly or by third parties, in order to verify the adequacy of their business with the principles set out in the Code of Conduct.

EssilorLuxottica has mostly focused on its upstream direct supply chain, notably through audits of its suppliers, with specific attention and coverage of suppliers of its AFA (Apparel, Footwear and Accessories) division.

Indeed, supplier risk assessments and sustainability evaluations, as well as on-site audits, are at the core of EssilorLuxottica's responsible sourcing program. To ensure this, qualified third parties support supplier compliance with the Company's ethical working principles as well as environmental and social responsibilities. This approach aims to prevent the risk of serious cases of non-compliance with sensitive topics, including working conditions (health and safety, working hours and remuneration), use of child labor and forced labor and corruption when selecting and monitoring suppliers:

- Suppliers are assessed in terms of country risk, industry risk, sustainability risk, spending with EssilorLuxottica, dependency, reputational impact and previous audit results (including date of last audit). Based on this assessment, suppliers are classified as low-, medium-, or high-risk suppliers;
- Depending on the outcome of the risk assessment, suppliers are required to undergo either a sustainability assessment via EcoVadis or an on-site Responsible Sourcing audit. The results of supplier audits are mentioned in Section 3.2.4 *Actions and Resources*;
- For supplier risk and sustainability assessments, EssilorLuxottica partners with sustainability ratings providers such as EcoVadis. EcoVadis assesses suppliers based on their sustainability policies, the actions they implement to execute them, and the measurable results or outcomes achieved across the following four pillars:
    - Environment (e.g., energy use and GHG emissions, waste management, water stewardship, biodiversity),
    - Labor & Human Rights (e.g., working conditions, health and safety, child and forced labor prevention, diversity and inclusion),
    - Ethics/Governance (e.g., anti-corruption measures, data protection, fair business practices),
    - Sustainable Procurement (e.g., supplier ESG risk assessments, responsible sourcing programs, traceability initiatives and monitoring of upstream partners);
- Suppliers assessed through EcoVadis can share their sustainability scorecards with customers and benchmark their performance against industry peers through the platform's ESG comparison tools;
- Responsible Sourcing on-site supplier audits are conducted in accordance with an annual audit plan and are informed by the results of the supplier risk assessment mentioned above. These audits primarily target high-risk suppliers, suppliers with low or unsatisfactory sustainability assessment results and suppliers operating within critical supply chains (e.g., AFA). EssilorLuxottica is supported by third-party auditors in charge of assessing supplier compliance in line with the Company's standards and principles, as well as local laws and regulations, and also defining corrective actions in the event of non-compliance. The Responsible Sourcing criteria and processes were further refined this year and updated in the Group's Direct Sourcing and Indirect Procurement policies.

EssilorLuxottica classifies each checklist item as either Essential or Aspirational criteria in its ELRSM Audit Operating Guidelines. These internal guidelines help assess the criticality and business relevance of each topic, including whether it relates to key sustainability areas.

Aspirational criteria do not result in audit non-conformities and do not require corrective actions. Essential criteria, however, require suppliers to implement corrective action plans (CAPs). Auditors assess each checklist item using defined criteria and manage follow-up actions in line with a corrective action matrix set out in the Guidelines.

Audit findings and results are analyzed using a count-of-issue approach, taking into account the severity and recurrence of the non-compliances. The rules and criteria that may lead to an audit failure are shared with suppliers before the audit is scheduled. When non-conformities are identified, EssilorLuxottica requires suppliers to address and close all issues within an agreed time following the audit.

Priority is given to zero-tolerance issues and to non-compliances with local laws, international standards (e.g., ILO Conventions) and minimum recognized management practices (e.g., ISO standards). EssilorLuxottica works with its business partners to ensure that issues are resolved as quickly as possible.

Suppliers who do not meet the Company's requirements after a responsible sourcing audit and who refuse to implement the necessary corrective actions, show no improvement and repeated issues across multiple audits are subject to business interruption or reduction.

In 2025, four business partner relationships have been terminated due to unsatisfactory Responsible Sourcing audit results.

This mechanism enables effective monitoring of high-risk suppliers by defining re-auditing and re-qualification requirements, including short-term follow-up in case of audit failure and a two to three-year time frame in case of an audit pass.

The existing initiatives and actions for delivering outcomes for value chain workers are tracked by the Responsible Sourcing function and presented on a regular basis to the ELRSM Steering Committee, composed of representatives of the Sourcing, Internal Audit, Manufacturing, Quality, Risk Management, Compliance and Corporate Sustainability functions.

Non-respect of international standards

EssilorLuxottica receives SpeakUp cases or complaints from its value chain workers alleging non-respect of matters covered by international Human Rights instruments, as explained in Sections 4.1.5.1 *SpeakUp reporting system* and 3.1.7.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns.*

In 2025, 18 allegations from suppliers and 36 allegations from customers (mostly consumer complaints to be handled by customer service) were received in SpeakUp and through HR channels, none of them having any material impact.

Cases of non-respect of the UN Guiding Principles on Business and Human Rights and ILO conventions may include:

- complaints or SpeakUp cases received containing harassment allegations made by subcontractors, in the upstream value chain;
- harassment and discrimination allegations in franchisees or customers, in the downstream value chain.

Engagement with workers in the value chain

At EssilorLuxottica, engaging with its value chain workers and incorporating their perspectives is important to manage actual and potential impacts on their well-being and on the sustainability of its value chain. This approach ensures that workers' insights inform decision-making and drive improvements in the Group's operations and partnerships. Moreover, the approach aims to build trust, improve working conditions, promote fair labor practices and ensure alignment with corporate values throughout the value chain.

EssilorLuxottica has several engagement mechanisms to gather worker perspectives and integrate them into its decision-making processes:

- **Standards and policies:** enforcing the EssilorLuxottica Business Partners' Code of Conduct: all value chain partners are required to comply with these standards, which align with internationally recognized frameworks such as the UN Guiding Principles on Business and Human Rights and the ILO Core Labour Standards;
- **Contractual agreements:** EssilorLuxottica embeds sustainability, ethical conduct and regulatory compliance into its supplier agreements. Suppliers must follow the Group's Business Partners' Code of Conduct, comply with applicable environmental and safety regulations and demonstrate their adherence to these requirements. To verify these commitments, EssilorLuxottica may perform inspections and audits, directly or through third parties, on the supplier's or approved subcontractors' premises with prior notice. These requirements form an integral part of the contractual relationship;
- **Regular communication and dialogue:** factory visits, worker interviews and focus group discussions as part of responsible sourcing audits help the Company understand value chain workers' needs, concerns and aspirations. Feedback mechanisms are established, such as anonymous reporting systems (e.g., SpeakUp), enabling workers to report issues without fear of retaliation. In line with the EU Directive on the protection of whistleblowers, and EssilorLuxottica's Reporting Policy, employees of Business Partners can use this reporting platform to report ethical breaches (Section 4.1.5.1 *SpeakUp reporting system*). EssilorLuxottica encourages its Business Partners to establish and implement their own internal reporting channels.

  Workers' feedback during responsible sourcing audits helps identify both actual and potential impacts on their well-being, such as unsafe working conditions, wage gaps or excessive working hours. EssilorLuxottica takes steps to ensure the perspectives of vulnerable or at-risk value chain workers – such as migrant workers, women or trade union workers – are understood and addressed during the responsible sourcing audits. Moreover, the Group uses the takeaways of its engagement activities to verify alignment with its expectations on business conduct and standards as set out in the Business Partners' Code of Conduct, which informs the Group's purchasing practices;
- **Collaboration with suppliers and local communities:** EssilorLuxottica collaborates with suppliers to conduct training programs and capacity building for workers, focusing on labor rights and workplace safety, along with dedicated training on the Group's Business Partners' Code of Conduct. Support is provided on implementation of corrective actions, with auditors working closely with suppliers during the CAP process to explain requirements, timelines and guide remediation until the follow-up audit;
- **Monitoring and audits:** EssilorLuxottica conducts regular annual third-party audits on its own manufacturing sites and on supplier sites to assess compliance with its labor standards and to gather insights on workers' well-being. Audit findings inform tailored action plans to address gaps and drive improvements.

Sustainability engagement with suppliers occurs at different stages of the value chain, from selection and onboarding to ongoing monitoring, through third-party audits and self-assessments, and to post-audit follow-up to validate audit findings and implementation plans.

At EssilorLuxottica, responsibility for ensuring meaningful engagement with value chain workers – through sustainability assessments, on-site audits and the integration of findings into the decision-making processes – is embedded within the corporate governance structure. This ensures alignment with the Group's sustainability goals and accountability at the highest levels of the organization. Operational responsibility for worker engagement resides primarily within the following functions:

- **Sourcing and Procurement**: it ensures supplier sustainability engagement activities are integrated into supplier selection, onboarding, monitoring and contract management processes. It works closely with the Corporate Sustainability team to address findings from worker engagement and audits.
- **Corporate Sustainability**: it ensures alignment with the broader sustainability strategy and international labor standards.

The most senior role responsible for ensuring engagement with value chain workers is the Chief Operating Officer (COO) who collaborates with the Chief Corporate Sustainability Officer, ensuring alignment between operational practices and sustainability objectives. Both the COO and the Chief Corporate Sustainability Officer report directly to the Chairman and CEO. The Responsible Sourcing & Manufacturing Steering Committee reviews the outcomes of engagement activities with a focus on manufacturing and responsible sourcing audits on a regular basis and ensures they follow up on any potential operations and supply chain risks. The Chairman and CEO and the Board of Directors receive updates on sustainability outcomes and provide guidance on strategic priorities related to EssilorLuxottica's Eyes on the Planet sustainability program.

EssilorLuxottica assesses the effectiveness of its engagement with value chain workers through a combination of key metrics, including number and type of findings during suppliers' audits, resolution times for grievances and corrective action plans, participation rate in supplier training and improvements in supplier compliance with the Group's Business Partners' Code of Conduct. Effectiveness is further evaluated via third-party audits, sustainability assessments on the EcoVadis platform and benchmarking against industry best practices. Findings are reviewed by the Responsible Sourcing & Manufacturing Steering Committee and integrated into policy updates, supplier action plans and new initiatives.

3.2.4 Actions and Resources

EssilorLuxottica's approach is to favor audits and remediation in order to prevent material negative impacts on value chain workers. In 2025, as part of the ELRSM program mentioned in previous paragraphs, 157 responsible sourcing audits were conducted on supplier sites, a 48% increase compared to the 106 audits conducted in 2024.

Among the 157 conducted audits in 2025, 124 current and potential Indirect and Direct Material suppliers were subject to audits in 22 countries. The split of audits was as follows:

- six follow-up audits due to unsatisfactory results of an audit from the previous year; and
- 118 recurring audits, to continue to be qualified as Company suppliers.

15 supplier audits were identified with critical non-conformities mainly in the areas of working hours, consecutive working days, health & safety and environmental management practices. Action plans were defined for all of them and executed in 2025.
For wearable suppliers, audits conducted under the Responsible Business Alliance (RBA) – which assess labor practices, health and safety, environmental responsibility and ethical business conduct – are accepted and may be shared by suppliers with other customers.

The audit process with a dedicated focus on AFA suppliers continued in 2025, with 33 audits of supplier production plants, representing 69% of AFA Global Collection spending, in line with previous years, located in six countries. Three supplier audits were identified with critical non-conformities in the areas of working hours and consecutive working days, as well as health & safety. Action plans were defined for all of them and executed in 2025.

In 2025, as part of the EcoVadis program for Tier 1 suppliers, supplier sustainability risk assessments have been carried out for over 24,000 suppliers and sustainability performance assessments were completed for over 1,900 suppliers.

In addition, to support and strengthen its responsible sourcing program and ensure alignment with Company standards, EssilorLuxottica has in place training, capacity building and awareness initiatives targeting suppliers and the procurement community. In 2025, a new training initiative focusing on the updated Business Partners' Code of Conduct and ELRSM audit checklist was launched focused on suppliers in 10 countries (including China, Myanmar and Vietnam), involving 34 factories with 58 participants in total. Moving forward, EssilorLuxottica will continue building its global program to further align and strengthen the organization and management of responsible sourcing.

In addition, with the acquisition of the Supreme brand, their supplier audit program has been integrated into EssilorLuxottica's responsible sourcing program in 2025.

In addition, as mentioned in Section 3.1.7.6 *Actions and Resources*, a Human Rights task force bringing together several functions (such as Corporate Sustainability, Compliance, Procurement, Risk Management, HR, EHS, Internal Audit and Operations) to coordinate actions related to Human Rights, in anticipation of the CS3D, was created in 2024.

Responsible Sourcing metrics

KPIs	2025	2024
Total Tier 1 Suppliers (direct + indirect globally)	~40,000	~40,000
Total Tier 1 Significant Suppliers (> EUR1m spending in 2025)	1,000+	1,000+
Tier 1 suppliers assessed on sustainability risk via EcoVadis tool	24,000+	
Tier 1 suppliers assessed on sustainability performance via EcoVadis tool	1,900+	
Number of Tier 1 supplier audits	157	106
• Indirect and Direct Materials	124	63
• Follow-up audits	6	5
• Recurring audits	118	58
• Supplier Audits with Critical Non-Conformities	15	7
• AFA	33	43
• Spending coverage *(%)*	69%	64%
• Follow-up audits	3	3
• Recurring audits	30	40
• Supplier Audits with Critical Non-Conformities	3	3
Suppliers' trained participants	58	46
Number of Terminated Business Partner Relationships (AFA And Direct Materials)	4	3
% of global Sourcing & Procurement staff trained on the Code of Ethics since its launch in 2024		*72%*

Note: The total number of Tier 1 suppliers and of significant suppliers for both 2024 and 2025 covers the global direct sourcing and indirect procurement perimeter, with >90% coverage. The definition of "significant supplier" applies if there is more than €1 million spending toward the supplier.

Started in 2025 and continuing in 2026, EssilorLuxottica will focus on preparing for CS3D. The following action plans are planned:

- enhancement of the Human Rights risk mapping in 2025, including the value chain;
- enhancement of third-party training on Human Rights and anti-corruption, including specific information about grievance and whistleblowing procedures;
- enhancement of the third-party due diligence and audit procedures (upstream and downstream supply chain);
- creation and implementation of a general process for the engagement of value chain workers as part of stakeholders' initiatives (including mapping of existing initiatives, identifying areas of involvement of value chain workers as part of stakeholders' initiatives, tracking of initiatives and results);
- selection and implementation of a third-party risk management and due diligence tool;
- enhanced formalization of prevention and remediation procedures;
- development of a dedicated audit checklist for Logistics suppliers to assess sustainability risks in the supply chain and ensure compliance with the Group's Business Partners' Code of Conduct.

3.2.5 Targets

In 2025, the Responsible Sourcing program has been further structured in line with the increasing integration of the Group. Internal targets have been set, and consistent with the monitored metrics, they cover the following areas:

- number of tier 1 suppliers being assessed on the EcoVadis platform in terms of sustainability risks and performance;
- number of on-site responsible sourcing audits being conducted;
- number of critical non-conformities identified and followed up;
- number of suppliers being trained on the Group's Business Partners' Code of Conduct.

3.3 ESRS S3 – Affected Communities

3.3.1 Introduction

In a world that is rapidly evolving, EssilorLuxottica remains steadfast in expanding access to vision care for the people and communities who need it most. From 2013, the Group's efforts have already enabled more than one billion people to access vision care, demonstrating a commitment that reaches far beyond its core business.

The launch of the OneSight EssilorLuxottica Foundation (the Foundation) in 2022 marked a new chapter in accelerating this Mission. As the largest vision care foundation in the world, and the only Global Collaborating Partner on the World Health Organization's SPECS 2030 initiative, the Foundation unifies the Group's philanthropic and advocacy work. It partners with governments, non-governmental organizations and industry thought leaders to strengthen national systems, advance integrated strategies and expand access to high-quality vision care and eyeglasses to underserved populations around the world.

EssilorLuxottica's continued progress in med-tech, innovation and community-led programs reflects an unwavering dedication, ensuring that everyone, everywhere, has the good vision needed to participate fully in school, work and society.

3.3.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG Topic	IRO name	Policy	Main actions	Target/Metric
Creating awareness of vision care for all	Creating access to eyewear and eyecare solutions for disadvantaged communities	• Eliminating Poor Vision in a Generation roadmap	• Creating permanent access (e.g., Rural Optical Points) • Innovating for affordable solutions (e.g., ClickCheck™) • Funding subsidized and free services (e.g., Special Olympics) • Raising awareness and advocating for vision care at the highest levels (e.g., brand partnerships, active participation as the sole Global Collaborating Partner of the WHO SPECS 2030 initiative)	• Number of people provided with permanent access to vision care • Number of rural optical points created • Number of people in need equipped with eyeglasses
Affected Communities' rights and engagement	Impact on local community development thanks to eyewear and eyecare programs			
Impactful programs that give vision care access to all	Volunteering activities and social initiatives			

3.3.3 Governance and Stakes

In line with the Group's Mission to "Empower humans", the Head of Mission and President of the OneSight EssilorLuxottica Foundation is responsible for overseeing the Group's initiatives to reach the 2.7 billion people living with uncorrected poor vision, reporting directly to the Chief Executive Officer and Chairman of EssilorLuxottica. The Group's CSR Committee, comprising nominated members of the EssilorLuxottica board, monitors the progress made on all Mission actions and ensures alignment with the Group's strategy and stated ambition of eliminating poor vision by 2050.

The OneSight EssilorLuxottica Foundation works globally toward creating vision care access across underserved regions. To facilitate this, the Foundation operates 9 regional affiliate non-profit organizations that are duly registered in their regions of operation: Europe, Italy, North America, Latin America, Africa, India, Southeast Asia, China and Oceania. Each of the regional affiliates reports its progress to its duly constituted board of directors. The Head of Mission serves on the board of all the affiliates and ensures alignment with the global Mission strategy, objectives and adherence to annual plans.

Relevant functional and regional leaders from the Group serve on the boards of all the regional affiliates to ensure close alignment with Group policies and collaboration with relevant stakeholders of EssilorLuxottica.

Today:

- 27% of the world's population is thought to suffer from myopia and this rate is expected to increase to 50% by 2050 due primarily to individuals spending more time inside and in front of screens;
- 2.7 billion people, or one-in-three globally, suffer from uncorrected poor vision due to lack of awareness and access, 90% of whom live in developing economies at the base of the pyramid[(1)];
- only 20% of the world's population owns a pair of UV protective sunglasses[(2)].

Good vision changes everything:

- Good vision is a catalyst for achieving UN Sustainable Development Goals (SDGs): It directly impacts goals related to quality education (SDG 4), decent work and economic growth (SDG 8), good health and well-being (SDG 3) and reduced inequalities (SDG 10). By improving vision, EssilorLuxottica aims to empower individuals to learn, work and contribute meaningfully to their communities.
- Good vision improves educational outcomes: Children with uncorrected vision impairments often struggle in school because 80% of learning takes place through vision, as estimated by the American Academy of Ophthalmology.
- Good vision promotes gender equality: In many communities, women and girls face disproportionate barriers to accessing vision care. By addressing these inequalities and giving them glasses, EssilorLuxottica intends to empower women and girls to reach their full potential.
- Good vision can transform families: By empowering individuals through professional training and entrepreneurship opportunities in the vision care sector, EssilorLuxottica witnesses first-hand how good vision strengthens economic independence for individuals, families and communities.
- Good vision promotes healthy aging: Regular eye exams can help detect signs of other health issues, such as diabetes and hypertension, leading to better prevention and improved quality of life.

The Group's dedicated efforts to eliminate uncorrected poor vision for 2.7 billion people are managed by the OneSight EssilorLuxottica Foundation (the Foundation).

3.3.4 Strategy and Policies

EssilorLuxottica believes good vision is a basic human right and has an ambition to eliminate uncorrected poor vision in a generation. To achieve this milestone, the Group launched its groundbreaking "Eliminating Poor Vision in a Generation" roadmap, at the 2019 United Nations General Assembly, supported by more than 20 government leaders, NGOs and private organizations dedicated to improving access to vision care.

The four key pillars of this strategy, focusing on the 2.7 billion people who live in developing communities and who cannot see clearly, are:

1. **Creating permanent access**

   The Foundation trains people to be primary vision care entrepreneurs, supporting them to set up their own optical shops and provide mobile services in their communities. To ensure the longevity of these services, the Foundation provides ongoing business development support for these entrepreneurs. It also works with local governments and communities to build permanent vision centers alongside hospitals, clinics and other primary health facilities.

2. **Innovating for affordable solutions**

   The Foundation invests in innovation to accelerate the affordability of providing communities with sustainable vision care services and products. Through the development of low-cost, digital and automated screening tools that require less operator training, the Foundation is scaling up the digitization of existing and new efforts and opening up access to affordable quality glasses. This is done in close collaboration with the Group's R&D as well as Operations teams.

3. **Funding subsidized and free services**

   The Foundation works with governments and NGOs to provide free and subsidized services to the communities most in need through direct programs providing vision screenings and eyeglasses and indirect programs led by partners and funded by the Foundation.

(1) *Base of the pyramid refers to populations with annual per capita income – based on purchasing power parity in US dollars – of less than US$1,500, the minimum considered necessary to sustain a decent life. Source: Coimbatore Prahalad and Stuart Hart, "The Fortune at the Bottom of the Pyramid", Strategy+Business 26 (2002): 54-67, http://dx.doi.org/10.19177/reen.v1e220081-23.*

(2) *https://www.trustnet.com/news/13456209/why-essilorluxottica-wont-be-dislodged-as-the-worlds-leading-glasses-company.*

4. Raising awareness

    The Foundation focuses on creating awareness around good vision and prompting health-seeking behavior among remote communities that have been without vision care access or awareness untill now. In addition, the Foundation advocates to ensure vision care has the attention it deserves among global and national policymakers and decision-makers as the future of good vision relies on understanding the improved quality of life to which healthy vision contributes.

The OneSight EssilorLuxottica Foundation has three primary objectives relating to creating access to vision care for this population:

- number of people with permanent access to vision care within one day's travel;
- number of rural optical points;
- number of wearers equipped by the Foundation's (direct and indirect) programs.

Targets for these objectives are set at a global level and cascaded down to the nine regional locations on an annual basis. Each region has a local leader reporting directly to the Head of Mission and President of the Foundation. They are supported by global functions including Communications and Awareness, Advocacy and Partnerships and Customer Giving.

Focus at a regional and country level on the Foundation's four strategic priorities, creating permanent access, innovating for affordable solutions, funding for free and subsidized services and raising awareness, varies according to local need and population data. Similarly, partners are defined at a country and state level to best meet the needs of the Foundation's beneficiaries and accelerate the Foundation's reach.

On top of the EssilorLuxottica Group, the Foundation is supported by EssilorLuxottica employees who volunteer in clinics and programs, donate to the Foundation, help raise awareness and call for customer donations in retail stores and spread awareness of eye health and good vision on social media. Opportunities to engage with the Foundation are offered to employees through local HR volunteering policies and many employees choose to support the Foundation outside of work hours as well. In 2025, more than 7,300 EssilorLuxottica employees donated their time to the Foundation.

3.3.5 Actions and Resources

To ensure that the Foundation can reach its ambition and create an impact for communities in need, specific actions have been put in place across the four key pillars of its strategy described above. Select examples of these actions include:

1. Creating permanent access

The OneSight EssilorLuxottica Foundation creates permanent access by supporting national vision care systems rather than delivering one-off interventions. Its work has enabled over 1 billion people to access vision care across more than 140 countries, through 37,900 primary vision care entrepreneurs trained by the Group's Sustainable Programming function to deliver refractive services in underserved communities.

These entrepreneurs receive clinical, marketing and business development training to conduct basic vision tests, make appropriate referrals and establish independent rural optical points that generate livelihoods while expanding access to essential vision care where none previously existed.

The Foundation's Asha Kirana model, recognized by the World Health Organization as a global best-in-class approach, has become a blueprint for governments. In Karnataka, it is now being scaled statewide with 393 new vision centers and 40,000 community health workers trained to deliver services directly to rural families. This systems-level impact is reinforced through the Foundation's role as the sole Global Collaborating Partner for WHO's SPECS 2030 initiative, where it co-develops national strategies for refractive error services to alleviate the burden of poor vision across 15 countries.

To secure long-term access, the Foundation also builds a skilled workforce by training under-employed youth, especially women, as primary vision care providers. Its EyeConnect model combines certified training, tele-refraction technology and entrepreneurship to create sustainable livelihoods while extending year-round services to remote communities.

2. Innovating for affordable solutions

Enhancing the delivery of care globally

The OneSight EssilorLuxottica Foundation accelerates access to vision care by developing innovations that lower the cost of care while raising the standard of what is possible in low-resource environments. ClickCheck™, a portable, low-cost diagnostic tool created for frontline use, has become one of the most effective ways to expand screening in communities without traditional infrastructure. Each ClickCheck™ device costs USD$55, compared to thousands of dollars for traditional auto-refractors, and can estimate refractive errors in 1-3 minutes, while ensuring accuracy in diagnosis against the gold standard of subjective refraction at 94%.

This has allowed the Foundation to advance digital tele-refraction, enabling remote clinical expertise to reach rural areas and helping governments overcome workforce shortages without compromising quality.

Empowering local youth to deliver vision care to communities close to home

These technologies are now being integrated into public health systems across India and Africa, supporting ministries of health as they operationalize their SPECS 2030 strategies. Building on this, the Foundation's EyeConnect model equips young people with digital tools, certified training and business skills, creating a new generation of locally based vision care providers.

Bringing vision care to the heart of the action

Most recently, the Foundation has introduced a mobile eyecare caravan in Zambia, creating a roaming clinic that offers refraction and on-the-spot eyewear dispensing at roadshows, traditional ceremonies, markets, churches and schools. Operated by local optometrists and available to optometry schools for outreach, the caravan lowers the cost of service delivery while expanding into communities that static facilities rarely reach.

Together, these innovations reduce costs, strengthen national systems and ensure that high-quality vision care can be delivered sustainably, even in the hardest-to-reach communities.

3. Funding subsidized and free services

As the WHO's Global Collaborating Partner for SPECS 2030, the Foundation directs funding toward models that help governments operationalize long-term refractive care. A few examples include:

Strengthening State-led vision care for children in India

In India, the Foundation's support for the Vision for All program enabled Goa to mandate annual screenings for every schoolchild – the first state in the country to do so. This success has now prompted Arunachal Pradesh to replicate the model, accelerating the expansion of fully subsidized school-based vision care.

Providing good vision to athletes in need

The Foundation continues its two-decade partnership with the Special Olympics, funding free screenings and eyeglasses that allow specially abled athletes to see clearly during the Games. This support reflects the Foundation's commitment to ensuring that cost or circumstance never prevents individuals from reaching their full potential.

Bringing care to vulnerable families in Europe

In Italy, the Foundation funds "Giornate della Vista" (Days of Sight) clinics, delivering free vision screenings and eyeglasses through ten clinics operating across ten months each year. These clinics serve people experiencing social or economic difficulties, ensuring continuous access to essential care.

Reaching remote and underserved communities

The Foundation also funds fully subsidized outreach in some of the world's hardest-to-reach settings. In Vanuatu, it supports community clinics and roadshows and has backed the launch of the country's SPECS initiative to strengthen national capacity. In Jammu and Kashmir, the Foundation provides free services to artisans whose livelihoods depend on precise vision, ensuring that remote geography does not limit access to care.

4. Raising awareness

Mobilizing brands and retail channels

The Foundation raises awareness at scale by integrating the vision care cause directly into EssilorLuxottica's global retail network. Through in-store communications, point-of-sale giving and customer-facing prompts, more than 10,500 stores worldwide help consumers understand the impact of good vision and contribute through customer-giving programs that support access in underserved communities. These retail partnerships make vision care visible in everyday life, transforming routine shopping moments into opportunities for public engagement.

Amplifying the message through global icons

Strategic brand collaborations extend this reach even further. Kylian Mbappé, through his partnership with Oakley, brings global attention to the importance of good vision for young people and athletes. Oliver Peoples' collaboration with Roger Federer opened the door for the Foundation to collaborate with the Roger Federer Foundation to support the delivery of vision care to 2,700 children in Zambia. The Foundation also works closely with the Rafa Nadal Foundation in Spain, reinforcing the message that vision is fundamental to learning, sport and personal development. These partnerships leverage cultural influence to make vision care a mainstream social cause.

Engaging employees as global advocates

Within EssilorLuxottica, the Foundation activates one of the world's largest employee communities through iGive volunteering programs and internal campaigns that commemorate major milestones such as World Sight Day. The "Learn, Act, Share" approach encourages employees to deepen their understanding of the global vision crisis, champion the cause publicly and participate in meaningful ways – strengthening pride, connection and purpose across the organization. In 2025, this approach translated into 189,190 learning opportunities, active participation from EssilorLuxottica colleagues across 7,396 milestones and 64,724 moments of social advocacy, exceeding targets across all three pillars and reinforcing a strong sense of pride, connection and purpose across the organization.

Sustaining awareness through research and education

These public efforts are reinforced by the Foundation's open-access resources page, which curates over 1,000 studies on the impact of good vision[(1)]. By equipping governments, partners, retailers and communities with trusted information, the Foundation ensures that awareness is grounded in evidence and that vision care remains recognized as a basic human right.

3.3.6 Targets and Metrics

In 2018, EssilorLuxottica announced its ambition to eliminate uncorrected poor vision by 2050. To define what it would take to achieve this ambition, the Group worked with McKinsey and Company to understand what actions would need to be taken. This research was published in the report "Eliminating Poor Vision in a Generation: What will it take to eliminate uncorrected poor vision by 2050" and launched alongside the United Nation's General Assembly in 2019.

This publicly available report outlines the collective year-on-year progress that is needed to realize this ambition. While the targets outlined in this report rely on actions by all stakeholders, the OneSight EssilorLuxottica Foundation proportionally aligns its progress to these targets. The Foundation also helps other organizations identify actions and areas to prioritize based on these public targets to eliminate uncorrected poor vision.

Across 144 countries, through direct or indirect (partner) programming, the Foundation has achieved these levels of impact:

Impact areas	Since 2013	In 2025
People provided with permanent access to vision care	1 billion	101 million
Rural optical points created	37,900	4,469
People equipped with eyeglasses	100 million	14.1 million

3.4 ESRS S4 – Consumers and End-Users

3.4.1 Introduction

At the core of EssilorLuxottica lies a fundamental commitment to its consumers. This section explores the pivotal role of the consumer in everything the Company does, from the initial design concept to the final product delivery. Its approach is centered on three core pillars: data privacy, transparent communication and unwavering quality. In an increasingly digital world, safeguarding consumer data has never been more critical. The Group also ensures that every interaction is handled with the utmost care and transparency. And above all, EssilorLuxottica strives for exceptional quality in both its products and in the consumer's experience.

This section outlines how these principles guide the Group's actions and reinforce its dedication to putting the consumer at the heart of everything it does. It provides an overview of policies covering all consumers, actions, metrics and, when available, targets to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities related to consumers.

3.4.2 Quality

3.4.2.1 Introduction

EssilorLuxottica considers product quality an essential value for the success of the Company. Quality Policies reflect the ongoing commitment to excellence and customer satisfaction. Quality is recognized as a strategic pillar for building long-term trust and reinforcing the Company's reputation for reliability and innovation.

3.4.2.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG topic	IRO name	Policy	Main Action	Target/Metric
Product Safety	Potential Health & Safety issues for consumers due to use of the products	• Quality Policies • Consumer complaints management • Supplier Quality agreements	• Enhancement of the Quality Management System by integrating MDSAP requirements • Implementation of new testing procedures and advancement of the methodology, also leveraging artificial intelligence	• **Achieving <1 ppm** in global consumer claims related to personal safety and consumer risks • **Maintaining zero recalls** in EU countries
	Risk of litigation and reputational damage due to product quality and safety issues		• Enhancement of the Quality Policy to support the Company's growth and ongoing evolution within the med-tech industry	

(1) https://onesight.essilorluxottica.com/research/.

3.4.2.3 Policies

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies.*

Document	Function	Scope	Availability
EssilorLuxottica Quality Policy	Quality	Own operations	Public
Consumer complaints management	Customer-facing teams and Central Quality	Own operations	Internal
Supplier Quality Agreements	Quality	Upstream	Internal

Human Rights are covered within EssilorLuxottica's compliance policies, reflecting the Group's commitment to comply with applicable laws and regulations, including internationally recognized instruments as stated by the OHCHR (Office of the United Nations High Commissioner for Human Rights). Moreover, EssilorLuxottica has implemented a CAPA (Corrective and Prevention Actions) policy to address any identified Human Rights issues related to product defects or service failures that could affect consumers.

3.4.2.4 Processes for engaging with consumers

EssilorLuxottica continuously monitors consumer feedback to assess potential and actual product impacts. Through its After-Sales function, the Company gathers insights from market surveillance, product claims and returns. This data enables the Company to evaluate whether adjustments to its quality policies are needed and to determine whether corrective actions, new testing protocols or updated product risk analyses are required to mitigate potential risks to consumers.

This process is integrated into the Company's overall approach to product quality and safety. The After-Sales department manages consumer engagement channels and feedback collection, while the Group Quality function analyzes and assesses feedback related to product safety (quality compliance) and product quality (quality excellence). Together, these departments ensure that consumer insights inform decisions on quality and safety measures.

3.4.2.5 Processes to remediate negative impacts and channels for consumers to raise concerns

EssilorLuxottica's Quality Management System has a dedicated procedure for handling consumer complaints and adverse events across all Group distribution channels. This procedure establishes clear responsibilities and processes for collecting, documenting, evaluating and reporting product quality complaints and safety issues in compliance with regulatory requirements.

Consumer Complaint Collection and Reporting

Consumer complaints and adverse events are gathered from various distribution channels, including subsidiaries and distributors in both EU and non-EU markets. Consumers can raise concerns through stores, brand-specific Consumer Services, e-commerce-dedicated consumer service channels (for proprietary e-commerce sites) via email, phone and, where available, chat. Additionally, the corporate website features a dedicated consumer service page with detailed guidelines (https://www.essilorluxottica.com/en/brands/consumer-care/) providing a unified communication channel regardless of the consumer's purchasing platform.

To ensure a timely response, any channel receiving a consumer complaint must immediately forward it to the relevant department according to the dedicated communication flow. This triggers a reporting procedure to the Group quality team, which evaluates complaints and determines corrective actions in case of defective eyewear models. Reports are stored in the Company's PLM (Product Lifecycle Management) Enovia/Matrix IT system and analyzed for severity. The effectiveness of corrective actions is assessed through KPIs on warranties, complaints, safety issues, recalls and fines.

Data Monitoring and Escalation Processes

The Group Quality function periodically extracts and reports complaint data to management for review and potential corrective actions. Additional measures are activated in case of incidents that could significantly impact consumers (e.g., life-threatening situations or severe health risks). For instance, the "Surveillance and Vigilance" procedure ensures timely reporting to regulatory authorities.

Product safety issues are tracked using a dedicated questionnaire and stored in a specific repository. These issues, along with technical complaints, are registered in the PLM system and monitored by central quality. Continuous monitoring of reports evaluates the effectiveness of reporting channels and identifies areas for improvement.

Root Cause Analysis and Corrective Actions

In case of an incident, a root cause analysis assesses factors such as manufacturing processes, design, labelling and user instructions. Depending on the outcome of internal audits, solutions may include the replacement or repair of individual products, corrective actions to address products already on the market and changes to future production. These steps are designed to mitigate risks and prevent recurrence.

Additionally, data from complaints feeds into the Company's post-market surveillance system for continuous improvement. This system continuously monitors and assesses product quality, performance and safety, ensuring appropriate actions are taken to maintain high standards and update risk analyses of affected products.

Consumer Feedback and Continuous Improvement

EssilorLuxottica has established structured processes to monitor and enhance consumer satisfaction.

The Group leverages the Net Promoter Score as a key metric, tracked globally through a centralized system and real-time email surveys following purchases. This approach enables engagement at different stages of the consumer journey, providing insights into both sales experience and product satisfaction. Feedback received may trigger customer service cases to address specific requests.

To enhance service quality, consumers contacting e-commerce consumer services receive a satisfaction questionnaire. The responses are analyzed to identify areas of improvement in consumer service management.

Multiple consumer service channels, as well as ongoing communication with regulatory authorities, healthcare providers and users regarding investigations and actions taken strengthen responsiveness and trust.

Risk Management and Current Performance

Cases involving risks of retaliation or other concerns are assessed individually with the support of the legal department. To date, no significant consumer complaints requiring corrective action have been received. For safety complaints, EssilorLuxottica has achieved a retrieval rate of less than 1 ppm (part per million) on the total number of shipped pieces, demonstrating the effectiveness of its product quality and safety processes.

3.4.2.6 Actions and Resources

EssilorLuxottica's Commitment to Product Safety and Innovation

Product safety is a top priority and the foundation of EssilorLuxottica's sustainable offering. Its products are the result of continuous investment in research, design and innovation, and are developed according to high-quality standards with stringent controls on mechanical, chemical and optical characteristics that are equal or superior to industry standards and regulatory requirements in terms of safety, performance and durability. Indeed, the Group's sustainable innovation expertise embraces products and services without compromising excellence or quality and always guarantees the best vision experience.

For safety-related actions, EssilorLuxottica applies the 8D (Eight Disciplines) problem-solving methodology, enabling systematic identification, correction and prevention of recurring issues. New control plans and testing protocols have been introduced to strengthen product safety (i.e., checks on optical powers, lens transmittance and filter category, and lens fixing). To reduce waste of materials, samples of products otherwise destined for disposal are used for testing New Product Introductions. Internal stakeholders receive ongoing training through the Leonardo platform, fostering continuous professional development.

Supplier Quality Assurance

To strengthen product quality and regulatory compliance across its supply chain, EssilorLuxottica requires suppliers to sign Supplier Quality Agreements, defining roles and responsibilities to ensure that all supplied products meet technical specifications and regulatory requirements. These agreements cover audits, certifications, change management and adherence to the Business Partners' Code of Conduct and are reviewed every five years, with amendments applied when necessary.

EssilorLuxottica's rigorous testing procedures

To guarantee maximum product safety and efficiency to its patients and consumers, EssilorLuxottica performs all tests required to ensure compliance with international regulations concerning chemical substances and medical and consumer products, using both in-house laboratories and third-party certified facilities. Particular attention is given to compliance with restrictions for PFAS products and possible developments of related regulations at the international level in the coming years.

EssilorLuxottica conducts testing at multiple stages:

- Pre-production: tests and risk evaluations in the Company's ISO 17025-accredited internal laboratories, documented and archived in the PLM system. If any non-conformities or critical issues are identified during these tests, they are addressed through the quality management system before the product can proceed to production;
- Production: batch sampling for UV absorption, lens transmittance uniformity, optical powers, polarization axis and mechanical and aesthetic properties, governed by detailed operating instructions that are part of the Quality Manual. If any product fails to meet quality standards, it is flagged as non-conforming and managed in accordance with the "Product Nonconformity Management" procedure, which ensures the product is separated from compliant items, reworked or repaired before reaching the market;
- External testing: accredited third-party laboratories perform compliance tests in line with European and international standards, evaluating a variety of eyewear models to ensure broad coverage of different materials, designs and categories.

Specific measures for ophthalmic lenses include ISO 10993 protocols for skin biocompatibility and ISO 14889 tests to prevent lens breakage which could compromise consumer safety by exposing eyes to harmful cuts.

Overall, EssilorLuxottica's robust testing procedures in internal and external laboratories, coupled with continuous monitoring of product quality during production and post-market, ensure the Company's commitment to preventing negative impacts on consumers while maintaining the highest safety and quality standards. This was confirmed by the achievement of zero recalls in 2025.

Non-Animal Testing Initiatives

Considering general growing sensibility around animal welfare practices (expressed also in the EssilorLuxottica Quality Policy) and, at the same time, the need to test products to ensure skin biocompatibility as required by international medical device regulations, a roadmap has been created to merge these two needs. EssilorLuxottica abides by the 3Rs of animal testing (Replacement, Reduction, Refinement) to the greatest extent possible by investing in non-animal testing methods.

While waiting for a completely in vitro test protocol to be included in the ISO regulations to evaluate skin biocompatibility of materials and as alternative non-animal methods are progressively validated (e.g., the work of EURL ECVAM – EU Reference Laboratory for alternatives to animal testing) though not yet internationally approved, EssilorLuxottica is already working with certified and approved labs to conduct in vitro tests and avoid any animal tests, in line with the Group's decision to completely eliminate animal testing to evaluate skin biocompatibility of materials. In 2025, no animal tests were conducted to evaluate skin biocompatibility.

This approach is also in line with the Group's animal welfare policy and in full compliance with international regulations concerning chemical substances and medical and consumer products. However, compliance with international medical device regulations may require animal testing. The evaluation of such requests requires full compliance of third-party certified facilities with local and international regulations on animal testing and scientific proof that there is no other viable alternative.

Innovations at the Agordo Central Quality Laboratory

In 2025, the Agordo Central Quality Laboratory continued its technological advancement and process optimization journey, with major upgrades in both testing capabilities and laboratory workflow, as reported below:

- AI-powered measurement system to determine the optical powers of plano sun lenses in a fully automated way. By analyzing the deformation of projected laser patterns, the system eliminates manual focusing and reading steps, delivering results within seconds while significantly increasing accuracy, repeatability and efficiency;
- transport simulation systems replicating real-world logistics conditions from warehouse to retail store (e.g., transportation means, temperature, humidity, vibrations);
- combustion ion chromatography for Total Fluorine analysis, enabling early monitoring of PFAS-related substances at the component level. This anticipates emerging regulatory trends and supports proactive product safety assurance;
- AI-based scheduling module integrated into the laboratory's LIMS for optimizing workload distribution across the global lab network. This ensures higher operational transparency and improved risk management in routine production monitoring.

Moreover, EssilorLuxottica leverages robotics and automation in its manufacturing processes to minimize quality variability.

Advancing Smart Eyewear and Hearing Aid Technologies

EssilorLuxottica continues to develop and reinforce its internal competence for smart eyewear regulatory framework and compliance aspects, applying common guidelines for the qualification of new products in every region. Given the riskier nature of this new type of eyewear, which integrates frame batteries and electronic components, EssilorLuxottica is enforcing mandatory control plans with more restrictive policies to control product safety, sampling in mass production units for testing, even if already certified.

In addition, EssilorLuxottica has developed competence on regulatory framework and risk assessments for Nuance Audio glasses, which feature advanced hearing technology built in seamlessly and invisibly.

New markets for advanced optic design

Stellest lenses, designed to slow the progression of myopia in children, are the first and only product approved by the US FDA. Class 2 registration was granted following a two-year clinical trial. EssilorLuxottica is building on this success by advancing next-generation product validation and pursuing substantial equivalence registration.

Adapting to a Changing Regulatory Landscape

EssilorLuxottica proactively monitors regulatory developments through a regulatory watch process, allowing it to anticipate the evolution of International and European regulations on product safety and performance, keeping consumer protection at the forefront of its operations.

Quality systems are in place to meet regulations across the product lifecycle and drive greater standardization at Group level. In 2025, EssilorLuxottica obtained MDSAP certification, demonstrating effective integration of the requirements from the various jurisdictions involved within the ISO 13485 Quality Management System, thereby paving the way for the registration and commercialization of products incorporating hearing aid technology.

Protecting Intellectual Property and Combating Counterfeiting

With 25,450 trademarks and over 16,500 patents and designs owned, intellectual property is one of EssilorLuxottica's most important assets, ensuring the excellence, uniqueness and superiority of its products. It is based on the registration and maintenance of the Company's trademarks and patents across the world.

As described in Chapter 1 of the 2025 Universal Registration Document, the protection of intellectual property rights also involves combating counterfeiting. The worldwide proliferation of counterfeiting not only threatens official sales channels and company reputation, but it also poses risks to the Health & Safety of consumers. The Company's authentic products are impossible to process or replicate without the necessary know-how as well as the ongoing innovation used in the production processes. To ensure consumers are not exposed to counterfeit products, the Company collaborates with local institutions and authorities around the world to intercept counterfeit products and combat the entire illegal production chain as best permitted by law. For greater effectiveness in the battle against counterfeiting and the expansion of parallel markets, EssilorLuxottica has developed GLOW (Guaranteed Luxottica Origin Worldwide) a traceability system based on RFID technology that can verify the authenticity of products as well as the suitability of resellers. It is passive, emits no radio waves, making it safe health-wise, and does not record personal data, providing only product information.

3.4.2.7 Targets

EssilorLuxottica's commitment to delivering the highest quality is reflected in its pursuit of excellence across key areas:

- aesthetics, ensuring that every product embodies beauty and meticulous attention to detail;
- comfort, with the goal of providing users with a perfect fit that enhances the consumer experience;
- performance, seeking to use the best materials and lenses to meet technical standards;
- functionality, ensuring that all products operate smoothly and efficiently;
- reliability, with a focus on creating products that last over time;
- safety, with a firm commitment to regulatory compliance and consumer protection;
- innovation, embracing technological evolution, and continuous improvement based on market feedback.

To measure success in these areas, EssilorLuxottica has set clear targets:

- fewer than 1 ppm global consumer claims related to personal safety and consumer risks every year;
- zero recalls for safety-related reasons every year;
- avoidance of any fines or sanctions connected to product safety and consumer protection.

These targets reflect the Company's dedication to providing products that meet the highest standards of safety, performance and consumer satisfaction.

3.4.3 Data Privacy

3.4.3.1 Introduction

EssilorLuxottica considers the protection of privacy and personal data a key priority in an increasingly global and digital environment. The Group is committed to complying with all applicable data protection and privacy laws in the countries where it operates.

Given the constant evolution of the different regulatory frameworks and their interpretation by local authorities, ensuring compliance across multiple jurisdictions may represent a challenge.

To address this, the Group constantly monitors new regulations and assesses their potential impact on business processes and data handling activities, aiming to build trust in its technologies and mitigate potential privacy risks.

EssilorLuxottica also requires its external providers, including suppliers and subcontractors, that process personal data on its behalf to comply with all applicable data protection laws and regulations and maintain adequate technical and organizational measures, even when engaging their own subcontractors. Data protection and security requirements are considered during the selection of its external service providers and included in the relevant vendor's assessment and contractual agreements.

EssilorLuxottica's data protection compliance program aims to protect personal data processed by the Group and its partners (e.g., suppliers and subcontractors) in accordance with applicable data protection laws and regulations. This program includes definition and regular review of applicable privacy documentation (e.g., privacy statement, privacy and cookie notices, Group data protection policies, cookie banners, data protection impact assessments, etc.), implementation of training and clear communication to data subjects (notably, through privacy statement and customer-facing privacy notices and cookie notices).

3.4.3.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG topic	IRO name	Policy	Main Actions	Target/Metric
Data Privacy	Consumers personal data breaches Infringements of data privacy-related regulations	• Code of Ethics • Business Partner's Code of Conduct • Data Protection Policy • Data Privacy Statement • Customer-facing Privacy Notice and Cookie Notice/Cookie Banner • Data Retention Policy • Data Breach Policy • Data Subjects Rights	• Definitions of new policies	• Monitoring of the Data Subject Requests (Chapter III of the Regulation EU 2016/679 – "GDPR") received at corporate level

3.4.3.3 Policies

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies.*

Document	Function	Scope	Availability
Code of Ethics	Compliance	Upstream and downstream	Public
Business Partners' Code of Conduct	Compliance/Sourcing & Procurement	Upstream and downstream	Public
Data Protection Policy	Compliance	Value chain	Internal
Data Privacy Statement	Compliance	Downstream	Public
Data Retention Policy	Compliance	Value chain	Internal
Customer facing Privacy Notice and Cookie Notice/ Cookie Banner	Compliance	Downstream	Public
Data Breach Policy	Compliance	Value chain	Internal
Data Subjects Rights Policy	Compliance	Value chain	Internal

Approach on Human Rights and engagement with consumers

All EssilorLuxottica's data protection policies are inspired the General Data Protection Regulation (GDPR), which recognizes the protection of personal data as a fundamental right, regardless of nationality or residence, and the European E-Privacy Directive. These principles are rooted in internationally recognized instruments, including: i) the EU Charter of Fundamental Rights (Article 8 "Protection of Personal Data"); ii) the European Convention on Human Rights (Article 8 "Right to respect for private and family life"), iii) the Treaty on the Functioning of the European Union (TFEU) (Article 13) and iv) the UN Universal Declaration on Human Rights (Article 12).

Engagement with consumers

The Code of Ethics, Privacy Statement, Customer-Facing Privacy Notices and Cookie Notices/Cookie Banners are available on EssilorLuxottica websites and in its stores. Customers are informed of major updates in the Customer-facing privacy notices through dedicated communications.

Measures to remedy Human Rights impact

Consumers and end-users can exercise their rights or provide feedback through multiple channels: i) SpeakUp platform (as per the Code of Ethics), ii) Group and local Data Protection Officer (DPO) email addresses (included in Customer-Facing Privacy Notices), iii) web interface for Data Subject Requests (DSRs) whose link is available in the relevant Customer-Facing Privacy Notice, iv) Customer Service contacts on brand websites, v) in-store personnel. As per applicable data protection laws, consumers may also file claims directly with the EssilorLuxottica entity and/or lodge complaints with relevant Data Protection (Supervisory) Authorities.

Availability of channels and tracking of effectiveness

Compliance and the Group Data Protection Office manage channels like SpeakUp and DPO mailboxes, coordinating with business functions and processing owners to retrieve all the information necessary to fulfill the data subject requests.

The other channels are managed by the relevant processing owners, which may involve, when needed, the Group Data Protection Office for consultation and advice.

Tracked KPIs to assess the effectiveness of the data protection safeguards in place include number and type of complaints received from data subjects and relevant resolution rates, as well as number of complaints received directly from data protection (supervisory) authorities.

EssilorLuxottica and its affiliates also maintain a data breach register, where each personal data breach affecting the relevant entity is recorded.

Policies in line with internationally recognized instruments

The EssilorLuxottica Code of Ethics and the Business Partners' Code of Conduct define the principles that apply to all EssilorLuxottica employees, contractors, vendors and suppliers, and in accordance with international frameworks such as the United Nations Global Compact. These policies establish a minimum set of standards (including data protection) that cannot be compromised.

EssilorLuxottica strives to comply with all data protection laws and regulations applicable in countries where it operates to ensure the protection of personal data of its stakeholders, including regulations like the General Data Protection Regulation (GDPR) in Europe, the California Consumer Privacy Act (CCPA) in the United States, the Lei Geral de Proteção de Dados Pessoais (General Data Privacy Law – LGPD) in Brazil, the Personal Information Protection Law (PIPL) in China, as well as specific regulations such as the Health Insurance Portability and Accountability Act (HIPAA) in the United States. EssilorLuxottica is also taking steps to address the requirements of new regulations on its current privacy processes and procedures, such as the AI Act and the Data Act in Europe.

Furthermore, its policies, statements, notices and guidelines conform to the following internationally recognized privacy instruments:

- the Standard Contractual Clauses (SCCs) implemented by the European Commission for the transfer of personal data to third countries;
- the guidelines, recommendations, best practices and opinions issued from time to time on different key topics by the European Data Protection Board (EDPB).

3.4.3.4 Processes for engaging with consumers

In recent years, data protection laws and regulations have increased significantly and still continue to do so, giving individuals more and more control over their personal data. EssilorLuxottica considers the protection of the personal data of its consumers and end-users (including patients and children) an essential priority.

EssilorLuxottica has therefore implemented appropriate protective measures to ensure the security of the personal data it processes. In the event of a data breach that could cause serious harm to the individuals concerned, the Group's policies require notification to its consumers and any applicable regulator when the Company is legally required to do so.

Direct engagement of consumers and end-users with EssilorLuxottica may occur directly and when they: (i) visit and/or purchase products or services in Group stores; (ii) browse and/or purchase products or services on its e-commerce platforms; (iii) use one of its digital tools/applications; (iv) contact customer services. For children specifically, engagement happens through their parents or legal guardians, who will authorize the use of their personal data by giving consent in all cases where it is legally required for processing.

The relevant processing owners have accountability and responsibility for privacy controls. This includes implementing the needed and proper privacy notices and collecting and processing personal data in compliance with applicable privacy and the data protection laws and regulations, as well as with EssilorLuxottica data protection policies, statements, notices and guidelines. Additionally, the processing owners must provide an appropriate mechanism to facilitate the intake and processing of DSRs.

The Group Data Protection Office, in its consultation and support role, provides processing owners with advice and guidelines, supports them in completing the required risk assessments (notably, data protection impact assessment) and provides documentation and notice templates. With the support of the Internal Audit function, the Group Data Protection Office measures and verifies that data protection is properly evaluated and addressed within EssilorLuxottica and participates in the development, monitoring and fulfilment of remediation action plans which may arise from such audits.

Additionally, affiliates may assess their consumer engagement effectiveness by monitoring (i) the DSRs received during the relevant period, as well as (ii) the complaints lodged by data subjects with the relevant Data Protection (Supervisory) Authority when consumers are dissatisfied with EssilorLuxottica's response or remedial actions.

3.4.3.5 Processes to remediate negative impacts and channels for consumers to raise concerns

Measures in place to address the concerns of consumers

When a data breach occurs, EssilorLuxottica initiates the necessary steps to mitigate its impact on the affected individuals. Each personal data breach is dealt with on a case-by-case basis, first assessing the risks involved and then using that risk assessment as the basis for determining the actions to be taken in each specific case. When relevant, EssilorLuxottica may set up call centers to answer questions raised by affected individuals, as well as notifying the affected data subjects and/or the relevant data protection (supervisory) authorities where required by applicable laws and regulations.

Raising concerns, tool knowledge, trust and protection

By analyzing both consumer complaints received directly and those filed with the relevant data protection (supervisory) authorities, EssilorLuxottica can assess consumer awareness and trust in its privacy management processes.

EssilorLuxottica's SpeakUp platform, which allows consumers to report (among other topics) privacy concerns, guarantees impartiality, confidentiality, efficiency and protection from retaliation. In this regard, it has to be noted that EssilorLuxottica enforces a strict non-retaliation policy protecting good-faith reporters from any detrimental treatment resulting from their reports, so that Group employees and stakeholders are prohibited from threatening or retaliating against reporters. Violations of this policy may result in disciplinary action, and both the responsible EssilorLuxottica entity and the individual engaging in retaliation may face civil or criminal penalties under applicable laws.

3.4.3.6 Actions and Resources

Introduction

EssilorLuxottica is committed to protecting personal data and its privacy while ensuring proper compliance with data protection laws and regulations in all the countries where it operates and in which it collects personal data.

The Group has in place a data protection compliance program, that is supported by comprehensive data protection policies and procedures for managing personal and sensitive data. Such a program facilitates the integration of "privacy-by-design" and "privacy-by-default" within the Group's activities that relate to the processing of personal data. This approach enables the organization to protect personal the data of its customers (health care professionals, opticians, optometrists, ophthalmologists, etc.) and end-users processed by the Group and/or its suppliers.

The Group provides training to employees through (i) the Leonardo platform, (ii) live online Teams sessions, as well as (iii) in-person privacy and security events. These are complemented by awareness programs and technical solutions to prevent data breaches.

The Group oversees that its business partners contractually adhere to the same stringent data processing and security standards as those existing within EssilorLuxottica. This includes both the launch of new products or services (including Nuance Audio Glasses), as well as the enhancement of the existing ones (such as teleoptometry, Ray-Ban Meta and related apps).

The Group conducts data protection impact assessments when required by law, such as when processing activities (i) pose particular risks to stakeholders' personal data, (ii) involve special data categories (e.g., health data) or (iii) imply processing of personal data on a large scale. EssilorLuxottica also maintains necessary data protection certifications (including ISO 27001 and HDS) when required to sell products or services in specific markets.

Organizationally, a Group Data Protection Office within the Compliance Department is established to centrally monitor data privacy issues. The Group Data Protection Office is supported in its activity by local correspondents (including Local Data Protection Officers) and dedicated committees. As the Group develops AI-powered innovations, such as the Varilux® progressive lens with eye-responsive technology, it actively monitors new regulations and their impact on existing data protection laws to maintain trust and mitigate privacy risks.

Privacy Training

During the reporting period, EssilorLuxottica provides its employees with regular privacy and data protection training modules and/or awareness communications with specialized content for teams managing consumer experiences (including retail, e-commerce, marketing and CRM staff). These modules cover specific initiatives and events such as Black Friday. A general privacy training program is also in place and addressed to all Group employees. Training is delivered in live sessions, in person, on Teams or on the Leonardo training platform.

Employee attendance is monitored by the Human Resources Department and the Leonardo team, in conjunction with the Group Data Protection Office through attendance reports drafted by the trainer and/or produced by the IT tool involved (Teams or Leonardo). In addition, employee training attendance on the Leonardo platform is monitored through a final knowledge test that each employee must pass in order to complete the training.

Role of the Group Data Protection Office

The Group Data Protection Office supports EssilorLuxottica affiliates in identifying (i) the key/at-risk functions to be addressed with appropriate training and awareness actions; (ii) the key/at-risk practices to be addressed with appropriate checks and audits; (iii) the actions to be undertaken in order to enhance DSR management; (iv) new data protection needs to be addressed with appropriate policies and procedures.

Furthermore, the Group Data Protection Office contributes to the improvement of information transparency for consumers and end-users by updating or developing new customer-facing privacy and cookie notices where needed.

Increasing awareness and reinforcing channels

EssilorLuxottica is improving the personal data collection of consumers and end-users by supporting business and operations teams in implementing a deeper granularity in the consent collection and unsubscription management process. This gives individuals more control over their personal data and how their personal data can be used by EssilorLuxottica to reach them.

In order to ensure effective implementation of data protection principles and rules inside EssilorLuxottica, the Group Data Protection Office can provide support to the relevant EssilorLuxottica/affiliate functions for the management of key topics, such as:

- DSRs;
- personal data breaches requiring notification to a competent data protection (supervisory) authority and/or to the affected data subject(s);
- exchanges with local data protection (supervisory) authorities;
- development of data protection training or data protection awareness activities on a business-need basis.

Data protection by design

The Group Data Protection Office and the local Data Protection Officers support the EssilorLuxottica business teams in the implementation of “privacy-by-design” and “privacy-by-default”. This approach takes into consideration (i) the state-of-the-art, (ii) the costs of implementation and (iii) the nature, scope, context and purposes of the processing, as well as (iv) the risks of varying likelihood and severity for rights and freedoms of data subjects posed by the processing.

Additionally, in order to achieve an appropriate level of compliance with the principles defined in the EssilorLuxottica Group Data Protection Policy, the Group Data Protection Office and Local Data Protection Officers support the relevant EssilorLuxottica business teams to conduct, where appropriate and/or required by law, assessments on personal data processing. These activities include Data Protection Impact Assessments (DPIAs), Legitimate Interest Assessments (LIAs) and Data Transfer Impact Assessments (DTIAs), where necessary, based on the risks of the processing for data subjects or when required under applicable data protection laws and regulations.

Data Breach prevention and notification

EssilorLuxottica commits to protect the privacy of its consumers and end-users and enhance the protection of their personal data by applying the principles set out in its Group Data Protection Policy and by implementing appropriate controls in an effort to prevent data breaches from occurring (or by mitigating their adverse effects on the individuals involved in case they occur).

EssilorLuxottica strictly adheres to the laws and regulations in force regarding data breaches in the countries where it operates and collects personal data. This comprehensive approach to data privacy indicates that, when required by law, EssilorLuxottica notifies the competent data protection (supervisory) authorities as well as (where applicable) the affected individuals in the case of a data breach. Additionally, it notifies law enforcement agencies regarding the data breach in case there is reason to suspect criminal activity behind the breach.

Continuous improvements

During the reporting period, EssilorLuxottica steadily increased its efforts to mitigate material risks for consumers and end-users by:

- putting at their disposal different channels by which they can raise concerns/exercise their rights pursuant to applicable privacy laws;
- increasing awareness and knowledge within the organization on data protection rules and principles through data protection training/dedicated awareness sessions;
- verifying the application of data protection rules and principles within its organization, through the monitoring of the audits lead by the Internal Audit function and related remediation plans;
- supporting the business to improve tools for data collection from consumers and end-users by implementing a deeper granularity in consent collection and in the management of the unsubscription process;
- supporting the business in conducting data protection impact assessments on risky data processing;
- monitoring the changing landscape of data protection and privacy requirements and making updates to the program as necessary.

In the spirit of continuous improvement, EssilorLuxottica will continue to work on the enhancement of the processes and activities set out above.

3.4.3.7 Targets

Quantitative targets are not considered applicable for this topic, as data protection performance is evaluated through governance, risk-based assessments and continuous monitoring. At this time, EssilorLuxottica monitors the effectiveness of its strategy through:

- the governance of data protection across the Group through the establishment of specific committees;
- the continuous assessment of the Group’s tools, processes and products from a data protection perspective, by launching, where necessary, audits with the support of the Internal Audit function and/or data protection assessments (DPIAs, LIAs, DTIAs);

- the monitoring and enhancement of the effective exercise of the rights of data subjects (for example, by improving the web interface and enlarging its scope both in terms of concerned entities and brands covered), which could also lead to a decrease of the numbers of complaints from data subjects to the Company and/or the data protection (supervisory) authorities;
- the improvement of transparency in communication to consumers relating to the processing of their personal data (for example through the deployment of the Group's notice template to the newly integrated entities and across the geographies – where possible based on local data protection laws –, or its regular updating based on new business and legal needs arising from time to time);
- the enhancement of data protection awareness among the employees involved in the processing of consumers' and end-users' data, by carrying out the needed training and awareness actions.

3.4.4 Transparent Communication and Reporting

3.4.4.1 Introduction

Sustainability is an integral part of EssilorLuxottica's DNA and is fully aligned with the evolution of its Mission of "Empowering Humans". In 2021, the Group launched its Eyes on the Planet program, which has evolved significantly over the past five years, shaping and strengthening the Company's sustainability strategy. Communicating these commitments, from the Corporate level to products, enables the Group to differentiate itself, strengthen its reputation and consumer loyalty, meet investor expectations, demonstrate compliance with major sustainability regulations and reinforce employees' sense of pride and purpose.

As the Group advances on its sustainability journey, it is more important than ever that its approach and efforts are presented in an accurate and consistent way to all audiences and stakeholders, and across all geographies.

3.4.4.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG topic	IRO name	Policy	Main actions	Target/Metric
Information-related impacts for consumers and/or end-users	Enhanced customer loyalty Risk of non-compliance with upcoming greenwashing regulations	• Corporate Communication Policy • Corporate Sustainability Communication Policy • Marketing Copy & Claim review	• 2 updated versions of the "alternative materials glossary and claims repository" • Internal audit performed on product sustainability claims process • 2025 Sustainability Highlights article was published on the website and shared across the Group's social media channels	• Number of non-compliances with sustainability-related communication regulations
Social inclusion of consumers	Granting of access to eyewear and eyecare			

3.4.4.3 Policies

EssilorLuxottica is committed to communicating its sustainability commitments and the sustainability performance of its products and services in a clear, authentic way to both internal and external stakeholders, while avoiding any misleading information and ensuring compliance with current and upcoming regulations.

Therefore, the Group has developed specific policies and guidelines, available on the intranet and shared with the relevant teams, to ensure that its sustainability approach and efforts are communicated accurately and coherently across all audiences and regions.

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies.*

Document	Function	Scope	Availability
Corporate Communication Policy	Corporate Communications	Own operations	Internal
Corporate Sustainability Communication Policy	Corporate Sustainability & Corporate Communications	Own operations	Internal
Marketing Copy & Claim review	Legal	Own operations	Internal

3.4.4.4 Actions and Resources

To maintain the accuracy and consistency of its sustainability messaging, EssilorLuxottica has developed various actions and communication tools.

Corporate Sustainability Communication

The Eyes on the Planet program is communicated regularly across all Group channels through a clear and targeted strategy. Progress and results are shared via the corporate website, the One EssilorLuxottica platform, social media, Digital Windows and Leonardo, each with content tailored to internal and external audiences.

An editorial calendar ensures a balanced mix of environmental and social topics strengthening stakeholder understanding of sustainability initiatives, demonstrating the Company's commitment and engaging customers, employees and investors through articles published on the intranet and website. In July, the Eyes on the Planet Newsletter was distributed to 110,000 employees, summarizing the most important projects and initiatives, which were also broadcast on Digital Windows in September. In December, a 2025 Sustainability Highlights article was published on the website and shared across the Group's social media channels.

Since its launch in 2021, Leonardo has served as a central hub for sustainability learning, providing educational content on the Company's Eyes on the Planet program. Both employees and eyecare professionals can access courses, workshops and live events on the occasion of world days dedicated to environmental and social topics, as well as content on sustainability reporting requirements. Each year, the Corporate Sustainability function organizes the "Sustainability Week", a series of live events in April in celebration of Earth Day, and reflecting the global theme from the Company's perspective. In 2025, the week featured two main sessions:

- "EssilorLuxottica Sustainability and Mission: 2024 Highlights", exploring the connection between EssilorLuxottica's Mission and sustainability, reviewing 2024 achievements, viewed by 1,200 learners from across the Group, and its Professional Solutions network;
- "Our Power, Our Planet: Driving Responsible Change", focused on the Group's renewable energy commitments, environmental footprint reduction and related results, viewed by 5,200 learners including employees and customers in its Professional Solutions network.

Visual health education

In 2025, Essilorluxottica accelerated the development of its first Leonardo physical Educational Center in France: Leonardo@Créteil, which welcomed 460 professionals from its Professional Solutions network in France. By renewing Qualiopi quality certification, Leonardo@Créteil allows participants to co-finance their training with public funds (OPCO), improving accessibility to its programs. The center offers educational sessions on technical, sales and management training, to support partners in developing their expertise in visual health.

Leonardo also provides educational content on products, brands and lens innovations. Its blended learning approach combines on-demand content, live sessions, virtual classes and digital services, accessible to both EssilorLuxottica clients and employees.

For more information, please see the Raising Awareness actions in 3.3 *ESRS S3 – Affected Communities*.

Responsible Marketing

The Company offers a wide range of face-to-face and e-learning training courses for its sales force, retailers, licensees and eyecare professionals that focus on product features, lens and frame design, quality standards and other aspects. For example, since 2022, a specific online training on "Responsible Communication" has been available to Central Marketing teams to raise awareness of communication challenges related to sustainability, diversity and inclusion and to equip the marketing community with tools to develop and implement more responsible communication campaigns.

In 2023, the Company also formalized and implemented a validation process for product marketing statements to ensure that appropriate substantiation exists for each of them and that sustainability-related claims are developed according to internal guidelines. A request form must be submitted to the risk evaluation committee, which includes representatives from the Legal and Sustainability teams, prior to launching a sustainability marketing campaign. To ensure compliance with key regulations, claims must also align with the overall strategy of the brand and comply with legal recommendations and risk assessments.

To pilot innovation and new product launches, EssilorLuxottica has implemented a Stage Gate process to build the products with all materials at different stages of the innovation (Concept, Feasibility, Development, Launch), including all marketing assets (promotional and non-promotional materials).

In 2025, two updated versions of the "Alternative materials glossary and claims repository" were shared with product and marketing teams to give them appropriate guidance and examples of previously validated communications. Additionally, an internal audit of the product sustainability claims process was also conducted to assess the adequacy and effectiveness of internal controls and identify areas for improvement in the process.

It should be noted that due to the diversity of regulations in effect around the world, each of the subsidiaries involved in marketing the Company's products and services may undertake their own monitoring to comply with local laws, standards and voluntary codes in force.

3.4.4.5 Targets

EssilorLuxottica is implementing frameworks, processes and actions to ensure regulatory compliance and avoid any potential litigation.

4 Governance Information

4.1 ESRS G1 – Business Conduct

4.1.1 Introduction

EssilorLuxottica operates on solid ethical principles to build trust with its employees, customers, consumers, suppliers, licensors, investors and franchisees. These principles are enshrined in its internal policies and the Code of Ethics, while expectations for business partners across its supply chain are outlined in the Business Partners' Code of Conduct. More specifically, EssilorLuxottica maintains strict vigilance and proactivity, including action plans and programs on anti-bribery and corruption and supplier relationship management. This vigilance is supported by SpeakUp, an internal reporting (whistleblowing) system, allowing employees and external stakeholders to report ethical concerns confidentially.

This section provides an overview of policies, actions, metrics and, when available, targets to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities related to EssilorLuxottica's business conduct, presented in the table below.

4.1.2 Material Impacts, Risks and Opportunities

Detailed descriptions of the different IROs presented in the table below are provided in Section 1.4.1.7 *Double materiality assessment outcome.*

Material ESG topic	IRO name	Policy	Main actions	Target/Metric
Business ethics and integrity & Responsible sourcing practices	Possible decrease of trust from business partners and employees	• Code of Ethics • Business Partners' Code of Conduct • Reporting (whistleblowing) policy	• Policy publication and roll-out	• Training activities: number of people trained
	Risk of unethical business practices		• Training activities	
Corruption and Bribery	Risk of ineffective policies related to anti-bribery and corruption	• Anti-bribery and corruption policy • Conflict of Interest policy • Anti-money laundering and terrorism financing policy	• Policy publication and roll-out • Training activities	• Training activities: number of people trained
	Potential unfair advantage over competitors	• Antitrust policy		

4.1.3 Policies

EssilorLuxottica is committed to responsible and ethical conduct in all countries where it operates, in line with the International Labor Organization (ILO) Conventions and UN Global Compact principles on Human Rights. Employees are called upon to act with integrity and professionalism, complying with local laws and regulations and the Group's standards embedded in its internal policies and Code of Ethics.

Internal policies and procedures are regularly updated and presented to the Board of Directors through the Audit & Risk Committee. Compliance with such policies from employees of the Group and its controlled entities is monitored by Internal Audit.

Detailed descriptions of the different policies presented in the table below are provided in Section 5 *Description of Group policies.*

Document	Function	Scope	Availability
Code of Ethics	Compliance	Own operations	Public
Business Partners' Code of Conduct	Compliance	Upstream and downstream	Public
Anti-bribery and Corruption Policy	Compliance	Own operations	Internal – Guidelines published on the Group's website
Conflict of Interest Policy	Compliance	Own operations	Internal
Anti-money Laundering and Terrorism Financing Policy	Compliance	Own operations	Internal
Antitrust Policy	Compliance	Own operations	Internal
Reporting (whistleblowing) Policy	Compliance	Own operations and value chain	Public

4.1.4 Governance

Compliance Organization

EssilorLuxottica's Compliance function is responsible for preventing, identifying and managing risks related to business ethics in compliance with the law, and applicable local and international regulations (see Chapter 2 of the 2025 Universal Registration Document), and for establishing, developing and promoting a culture of compliance across the Group. The Compliance function is notably responsible for the following pillars:

- Ethics Compliance (anti-bribery and corruption, gifts & hospitality, conflict of interest, relationship with healthcare professionals, lobbying, anti-money laundering, donations, sponsorship, Code of Ethics and Business Partners' Code of Conduct); it also comprises human rights compliance in collaboration with the Corporate Sustainability function;
- Personal Data and Privacy;
- International Sanctions and Export Control.

The Compliance function is also responsible for drafting and deploying, in collaboration with other functions, the Group compliance policies in those matters and the Group Code of Ethics and the Business Partners' Code of Conduct, and oversees the Group whistleblowing system SpeakUp.

The Compliance function comprises dedicated corporate teams for each compliance pillar and regional compliance teams across Europe, North America, Latin America and Asia-Pacific. These teams are responsible for localizing, where needed, and deploying the Group compliance programs within their regions. The Compliance department is also building specialized expertise to strengthen Group healthcare compliance and a network of Compliance Liaisons embedded across business units and geographies, serving as local points of contact and advocates for the program.

The Compliance function reports directly to the Chief Financial Officer, and has direct access to the Group Chairman and Chief Executive Officer and the Deputy Chief Executive Officer. Moreover, the Head of Compliance updates the Audit & Risk Committee of Board of Directors twice a year.

Competition law and antitrust compliance topics are managed by a separate specialized department reporting to the Chief Legal Officer and in charge of developing and implementing the Group Competition law compliance policy and the related training.

Governance Body and Procedures and Control Management

As described in Chapter 4 of the 2025 Universal Registration Document, the Audit and Risks Committee of the Board of Directors is also in charge of reviewing compliance risks and program. The Head of Compliance attends the Audit and Risk Committee's meetings, presents compliance updates twice a year and has direct access to the Chairman of the Audit and Risk Committee. In 2025, the following topics were discussed with the Audit and Risk Committee:

- update on the Compliance organization;
- compliance key projects and strategic activities for each compliance pillar;
- report on SpeakUp whistleblowing activities (anonymized);
- personal data incidents;
- deployment of the Code of Ethics and of compliance policies;
- compliance training program and results of the e-learning courses launched in 2024;
- compliance with economic sanctions.

The Management Procedures and Controls department centralizes and enhances the consistency in corporate policies and procedures through review by the relevant subject matter experts. Directly reporting to the Chief Financial Officer, this function monitors the publication of policies and procedures and ensures their proper implementation across all Group entities and geographies, supported by adequate communication, training, controls and quarterly stakeholder updates.

Moreover, initiated by the Internal Audit function, a cross-functional task force brings together key functions, including Internal Audit, Internal Control, Legal Affairs, Corporate Sustainability, Risk Management, Compliance, Management Procedures & Control and Human Resources, that meet quarterly to enhance collaboration on common interest topics such as corporate sustainability reporting, risk assessment, human rights, fraud prevention or whistleblowing. Additional functions may participate if relevant to the projects on the agenda.

Internal stakeholder engagement

The Code of Ethics and the Business Partners' Code of Conduct, along with related policies, were created under the ownership of the Compliance function, with the involvement of Human Resources, Legal, Corporate Sustainability, Asset Protection, Risk Management, Health & Safety, Intellectual Property, Internal Audit, Internal Control and Corporate Communications functions. In particular, the Code of Ethics was formally approved by the Chairman and CEO and the Deputy CEO of the Group.

The Code of Ethics, most policies mentioned in Section 4.1.3 *Policies* and the SpeakUp reporting system were also submitted for information and/or consultation with employee representatives in several countries, including France and Italy. Certain French entities have incorporated the Code of Ethics into their internal regulations.

Promotion of an ethical culture

The promotion of EssilorLuxottica's ethical culture and policies is an ongoing process and relies on multiple communication channels.

- Multilingual publication – policies are published in several languages to match target audience and the type of risk addressed by each policy (e.g., Code of Ethics in 19 languages, Business Partners' Code of Conduct in 13). The publication of the policies and of the Code of Ethics, as well as the launch of the internal reporting system SpeakUp, was announced globally via internal systems (newsletters, digital windows) and dedicated campaigns at corporate and local levels.
- SpeakUp communication – communications and presentation on the whistleblowing system are systematically associated with Code of Ethics communications.
- Tone from the top – deployment of Code of Ethics involves the Group's top executives, starting with the Chairman and CEO and the Deputy CEO. Tone from the top and exemplarity are also expected from middle management. The Compliance department regularly holds internal information sessions for executives and key managers in all regions, supported by communication kits, posters and Q&As for managers and employees.
- Training – mandatory training of employees and other stakeholders on key topics (e.g., Code of Ethics, Anti-Bribery and Corruption) is monitored by managers, with reminders also sent out to target populations to ensure completion of the training activities. Targeted ad hoc training is also provided for specific roles.
- Development and testing of an integrated conflict of interest's declaration module on the Group HR portal.
- The Your Voice – Culture Insights listening program gathers valuable feedback on Sense of Belonging, Culture Adoption, Transformation and Employee Experience, as explained in Section 3.1.2.4 *Processes for engaging with own workers and workers' representatives.*

4.1.5 Actions, Resources and Procedures

EssilorLuxottica has implemented multiple measures to embed its ethical approach into the Group's culture, including the whistleblowing process (SpeakUp), the anti-bribery and corruption programs and training initiatives.

4.1.5.1 SpeakUp reporting system

SpeakUp is an internal, secure online reporting platform hosted by a third-party vendor, accessible to all employees and, where required by law (including Directive (EU) 2019/1937), to external stakeholders, via computer, mobile application or phone (available in 11 countries through an external call center). SpeakUp is referenced in the Code of Ethics and the Business Partners' Code of Conduct, and is public and easily accessible through the Group's corporate website. Specific posters, in 26 languages, displayed across offices, stores and operations, explain how to report concerns, the types of issues that can be reported and the option to report anonymously without fear of retaliation.

EssilorLuxottica complies with legal requirements for whistleblower protection under applicable laws, including those transposing Directive (EU) 2019/1937. Protection, subject to applicable conditions, are extended to all employees as per EssilorLuxottica's Reporting Policy.

SpeakUp allows the reporting of concerns relating to unlawful behavior or breaches of the Code of Ethics in the following areas:

Accounting & Financial	Accounting, auditing, financial reporting, falsification of records
	Tax
Business Ethics	Antitrust or competition law concerns
	Bribery & corruption/gifts & hospitality/lobbying
	Conflict of interests
	Human Rights violation/child labor/forced labor
	Insider trading/stock exchange violation
	Money laundering and terrorism trafficking
	Personal data protection and privacy
	Trade sanctions/export control/customs
	Violation of anti-kickback/anti-gift laws (healthcare professionals)
HR, Diversity and Workplace Respect	Collective bargaining rights
	Discrimination
	Harassment and/or bullying
	Retaliation of whistleblowers/reporters
	Sexual harassment
	Substance abuse
	Wage/time theft/overtime
	Workplace violence – Assault, threat, vandalism
EHS, Consumers & Products	Consumer protection
	Product quality and safety
	Violation of environmental laws
	Workplace health & safety issues
Asset Protection	Brands or other intellectual property violation
	Fraud and embezzlement
	Security of IT, networks and information systems
	Theft – theft of cash – misappropriation of assets

The investigation process is described in detail in EssilorLuxottica's Reporting Policy, which is publicly available from the SpeakUp tool on the corporate website.

The Policy, available in multiple languages, provides transparent information on whistleblower protection. The Group procedures protect the confidentiality of reports and allow anonymous reporting. As mentioned in its Reporting Policy, the Group also seeks to conduct impartial investigations and prevents conflicts of interest among investigators.

The Group prohibits retaliation, as stated in its Reporting Policy, on the SpeakUp home page, in Q&A materials and in the Code of Ethics and Business Partners' Code of Conduct. Additional safeguards include:

- training and regular reminders for investigators (employees from selected functions trained to analyze, conduct interviews, evaluate documents and prepare reports), for example when investigators are appointed;
- Group procedures and strict access management of the platform;
- confidentiality of whistleblower identity through careful planning and standard operating procedures and interview framework;
- guidance for whistleblowers to report any perceived retaliation to Compliance or via a new SpeakUp report;
- automatic reminders, where deemed necessary, in the SpeakUp platform, to proactively contact whistleblowers who may be at risk.

If an internal investigation confirms misconduct, remedial and disciplinary actions may be taken. The SpeakUp tool also facilitates global data collection, to adapt compliance programs based on reported cases. An anonymized annual report is submitted to the Group's governance bodies.

Employees receive SpeakUp training through the Code of Ethics e-learning module and a specific SpeakUp e-learning module launched in 2025 on the Leonardo platform. The Compliance department also implements specific training for investigators.

4.1.5.2 Business ethics and integrity

Identification of unlawful behavior or breaches of the Code of Ethics

EssilorLuxottica applies a three-line defense model, as outlined in the Code of Ethics:

- first line of defense: Managers. Responsible for preventive controls before decisions and transactions are implemented, ensuring operational and support processes comply with the Code of Ethics;
- second line of defense: Control Functions (e.g., Internal Control, Risk Management, Compliance). These functions perform detective controls to ensure that the first-line controls have been implemented properly and support their implementation. These detective controls can be performed at scheduled intervals or randomly, on some or all decisions or transactions;
- third line of defense: Internal Audit. It performs periodic controls to ensure that the control system complies with the organization's requirements and is effective and up to date.

In addition to the SpeakUp reporting system described above, employees are encouraged to report concerns about unlawful behavior or ethical breaches to their line manager and/or to the Human Resources department, the upper-level manager or the Compliance function, as per the Company's culture of dialogue and communication.

Procedures to investigate business conduct incidents

The Group Reporting policy includes key principles for investigating all incidents, including allegations of bribery and corruption, promptly, independently and objectively. Compliance and Internal Audit generally conduct such investigations, with appropriate legal privilege safeguards. When it comes to incidents requiring forensic research in information technology tools, specific access procedures are in place to ensure compliance with data protection and privacy laws.

4.1.5.3 Prevention and detection of bribery and corruption

The Group applies a zero-tolerance policy against corruption, communicated through its Group anti-corruption policy, based on its cartography of corruption risks, and its Code of Ethics.

The Compliance function defines guidelines for the prevention, identification and management of corruption-related risks through its Sapin II risk mapping. This mapping is being updated with the following approach:

- review of current commercial practices, in order to issue a specific gifts & hospitality policy, in 2026, along with detailed guidance;
- new anti-corruption risk mapping methodology harmonizing the assessment of gross and net risks;
- review and update of the existing risk scenarios reflecting organizational changes and new risks arising from the evolution of Group activities, notably in med-tech, that implies increased engagement with healthcare professionals;
- preparation of a healthcare professional engagement policy and practical guidelines;
- preparation of a more detailed third-party management policy;
- detailed mapping and review of payment practices in the Professional Solutions division, to identify risks and gaps against the Group anti-money laundering policy, and to monitor approved exceptions and implement remediation.

Bribery and corruption allegations reported in SpeakUp, as well as business ethics and fraud or accounting allegations disclosed in SpeakUp, are anonymized and shared twice a year with the Group Statutory auditors, Supervisory Bodies pursuant to D.Lgs. 231/2001 (in Italy) and Internal Audit by the Compliance function. Serious business ethics violations (based on thresholds agreed with the Audit and Risk Committee) are also reported (after anonymization) to the Audit and Risk Committee.

According to EssilorLuxottica's anti-corruption risk map, the functions potentially most exposed to bribery and corruption risk include in particular:

- functions interacting with public officials (e.g., licensing, permits, taxation, customs, logistics, regulatory matters, research & development);
- commercial and sales functions (including risks of kickbacks, incentives, interaction with intermediaries or with healthcare professionals);
- sourcing, procurement and supplier management functions (very low exposure to public procurement);
- finance, accounting and treasury functions, including those involved in payment processing;
- real estate and facility management and maintenance functions;
- human resources functions;
- employees involved in joint ventures, partnerships or strategic projects;
- functions exposed to cash payments.

EssilorLuxottica has implemented anti-bribery and corruption programs as described before.

4.1.5.4 Training on business conduct and anti-corruption

The Compliance function delivers training both face-to-face and via the Leonardo learning platform. Numerous face-to-face training courses were held in 2025, in high-risk regions such as Latin America and South-East Asia, focusing on anti-corruption measures, and targeted sessions were provided on personal data protection for functions with higher exposure. Some of these sessions are repeated or extended to other business units or countries. New training sessions are also developed each year to address specific compliance topics (see Section 3.4.3.6 *Actions and Resources*).

In 2025, the Group gave priority to the following training on the Leonardo platform:

- anti-bribery and corruption training for all managers;
- awareness sessions for Human Resources and executives at corporate or regional/local level;
- privacy and data protection training (see Section 3.4.3.6 *Actions and Resources*).

Training	Anti-corruption training included in the Code of Ethics training (launched Q2 2024)	Specific anti-corruption training
Targeted employees	All employees, excluding manufacturing/ production and retail store employees	All managers
Key content	• Key principles, zero-tolerance principle and risks of corruption • Practical examples related to bribery and corruption (public officials and commercial corruption/kickbacks) • Key rules of conduct including integrity due diligence • Reporting of violations through SpeakUp • Key principles about gifts and hospitality and conflicts of interest	• Key definitions, zero-tolerance principle and risks of corruption • Prevention of the risk of corruption (notably public officials, gifts & hospitality, donations & sponsorship, lobbying and political contributions) • Due diligence on third parties at risk and red flags • Documentation and record keeping • Reporting of violations through SpeakUp • Quiz to validate the e-learning and several risk scenarios and examples related to the Group's activities
Number of active employees trained as of December 31, 2025	30,382 since 2024, covering 76% of the white-collar employees target.	11,250 since 2023, covering 77% of all Group managers, all functions included.
% of functions at risk covered	Information not available in the system, but by covering all white-collar employees, the Group will cover all functions at risk.	Information not available in the system, but by covering all managers, the Group will cover all functions at risk.

In the future, specific training formats will be implemented to cover top managers, while training for members of the supervisory bodies is under discussion.

4.1.5.5 Management of relationships with suppliers

Information on Responsible Sourcing is provided in Section 3.2 *ESRS S2 – Workers in the Value Chain*.

Considering EssilorLuxottica's global footprint, payment terms for services and goods can vary significantly across regions. In addition, the general terms and conditions agreed through commercial agreements with suppliers might also affect the payment terms which, in some cases, have been extended for suppliers that decided to join the voluntary supply chain finance programs. Payables with extended payment terms amounted to €344 million as of December 31, 2025 (€388 million as of December 31, 2024), representing approximately 12% of the year-end Group trade payables (see Chapter 5 of the 2025 Universal Registration Document, Note 23.2 *Other Current Liabilities* to the Consolidated Financial Statements).

The Group complies with applicable local regulations and is engaged to avoid or reduce instances of late payments to its suppliers, without any distinction between large, medium or small enterprises. At the same time, the Group continues to invest in monitoring KPIs, providing employee training and fine-tuning processes and tools.

During the year, the Company deployed a new tool for its data collection and monitoring processes related to payment practices. As of December 31, 2025, the tool covered approximately two-thirds of the Group's total trade payables. The implementation and integration of this tool across the Group's entities remained ongoing at year-end. The Company will continue the roll-out and stabilization of this solution during 2026 and progressively expand its functional scope in the subsequent reporting periods.

With respect to legal proceedings for late payments, the Group is not aware of any material cases currently outstanding.

New suppliers undergo a pre-qualification process, including sustainability assessments such as on-site responsible sourcing audits. Only after approval can the supplier start a business relationship with EssilorLuxottica.

4.1.5.6 Next steps

Building on the accomplishments described in this section, in 2026, EssilorLuxottica will focus on:

- continued deployment of the Code of Ethics and Anti-bribery and Corruption training, with a target of 85% completion rate, based on the current target;
- launching a conflict of interest declaration campaign, for functions at risk, targeting all entities on SAP;
- launching a gifts & hospitality policy;
- launching a policy on engagement with healthcare professionals;
- preparing new policies relating to donations and sponsorship, lobbying and political contributions;
- launching a conflict minerals policy;
- enhancing the third-party management process.

4.1.6 Targets and Metrics

Given the Group's ongoing evolution and the integration of recently acquired entities, EssilorLuxottica is prioritizing the stabilization of its reporting perimeter to ensure that future business conduct targets, including due diligence measures, are robust and consistent over time.

To the best of EssilorLuxottica's knowledge, there were no convictions or fines for violation of anti-corruption and anti-bribery laws in 2025.

5 Description of Group policies

Document	Main content	Function	Scope	Availability	ESRS
Code of Ethics	The Code of Ethics applies to all EssilorLuxottica subsidiaries and employees. Last updated in 2023, it reflects the principles and "golden rules', representing non-negotiable standards in the following areas: • respecting people and communities; • conducting business ethically; • protecting assets; • acting as responsible citizens (including protecting human rights & labor conditions). It also describes the SpeakUp whistleblowing system and the related protections. It is binding for all employees, regardless of role or location. EssilorLuxottica applies similar principles to temporary and seconded staff from external companies. The document is publicly available on the Group's website and on the One EssilorLuxottica intranet, ensuring accessibility for employees and stakeholders. EssilorLuxottica aims to ensure that its activities comply with the International Bill of Human Rights and the principles on fundamental rights set out in the ILO Declaration on Fundamental Principles and Rights at Work. The document was submitted and approved by the Chairman & CEO and the Deputy CEO of the Group.	Compliance	Own operations	Public	S1 S2 S4 G1
Environment Health & Safety Policy	It articulates EssilorLuxottica's commitment to minimize all environmental, Health & Safety impacts resulting from its operations, products and services. With reference to minimizing the environmental impacts of its operations, products and services, attention is on initiatives to: • reduce GHG emissions and on the improvement of Energy, Environment and Health & Safety management systems according to international standards and internal procedures; • reduce pollutant emissions; • reduce waste generation and promoting reuse and recycling of materials; • identify and manage emergencies through site-specific plans that protect people and the environment, aligned with local context and stakeholder needs; • constantly improve workplaces safety by identifying hazards, assessing Health & Safety risks and implementing preventive measures; • promoting the development of sustainable products incorporating Environment, Health & Safety topics along the value chain; • eliminate or reduce the use of substances that are potentially hazardous for people and the environment, promoting the use of suitable alternatives; • investigate incidents to determine root causes and prevent recurrence; • use natural resources (such as water) and raw materials rationally. Besides, EssilorLuxottica's belief that safeguarding the Environment and the Health & Safety of its employees, contractors, agency workers, visitors, customers and local communities is everyone's duty, in respect of their role and responsibilities inside the company. The policy states the importance of people's behaviours as the main factor for the prevention of accidents and for the deployment of a strong safety culture that prevents accidents.	EHS	Own operations	Public	E1 E2 E3 E5 S1

Document	Main content	Function	Scope	Availability	ESRS
Business Partners' Code of Conduct	A separate Code of Conduct, released alongside the Code of Ethics in 2023, applies to Business Partners across EssilorLuxottica's upstream and downstream value chain, including suppliers, distributors, franchisees, consultants, agencies, service providers, outsourcing partners, hiring agencies, licensing partners and landlords. It is being progressively deployed, with new standard contracts, terms and conditions striving to include, wherever practicable, a contractual obligation for business partners to comply with the Business Partner's Code of Conduct (or equivalent standards). Besides, the Business Partners' Code of Conduct reflects EssilorLuxottica's commitment to respecting and promoting Human Rights across its entire value chain as per the International Bill of Human Rights, International Labor Organization (ILO) Conventions, the United Nations Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. It sets clear expectations for its business partners and aims to ensure that they uphold the Company's commitment in areas of ethics, data protection, human rights and labour standards, environment (climate, energy, water, waste, biodiversity, etc.), health and safety. EssilorLuxottica also expects its suppliers and subcontractors, to the extent possible, to apply 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. The document was created under the ownership of the Compliance function and is publicly available on the Group's website and the One EssilorLuxottica intranet, ensuring accessibility for employees and stakeholders.	Compliance/ Sourcing & Procurement	Upstream and downstream	Public	E1 E2 E3 E5 S2 S4 G1
Climate Transition Plan	The Plan reinforces the Company's resilience under different climate scenarios and outlines the measures necessary to achieve the validated 2030 greenhouse-gas emission reduction targets. Its main contents are: • emissions-reduction targets set as per SBTi requirements; • climate change mitigation and adaptation; • energy efficiency; • renewable energy deployment; • suppliers' and other stakeholders' engagement.	Corporate Sustainability and Product & Operations Sustainability	Value chain	Internal	E1
Energy Management Policy	The objective of this document is to outline management methods and parties involved in energy conservation, efficiency and associated direct emissions of greenhouse gases (GHG), in accordance with environmental, legal and technical responsibilities. The main contents are: • energy consumption monitoring; • energy mapping and assessment; • energy audits and assessments; • process and equipment Design Requirements.	EHS	Own operations	Internal	E1

Document	Main content	Function	Scope	Availability	ESRS
Product Stewardship – Safety and Compliance of Chemicals, Materials and Components Policy	Product Stewardship is a Health & Safety and environmental management approach focused on proactive oversight of chemicals and materials throughout product design, production, sale and use. The Company, in fact, takes responsibility for minimizing impact on the environment and Health & Safety throughout all stages of the product life cycle. This document defines the management methods and responsibilities involved, with the aim to: • ensuring compliance with applicable chemical regulations/laws; • extend Group-wide awareness of the relevance of regulatory compliance; • ensure that risks linked to the storage, use and disposal of chemicals and materials in EssilorLuxottica's workplaces are controlled and managed; • clarifying roles and responsibilities for product stewardship and chemical management along with related control principles; • define the rules and guidelines needed to achieve product stewardship objectives; • regulate roles, responsibilities and control mechanisms for the involved parties. Through this policy, EssilorLuxottica manages its internal list of prohibited and restricted chemicals and presents risk assessment methods, control measures and emergency procedures. The policy helps the facility director and/or EHS manager i) determine the emergency situations linked to chemicals in routine or non-routine tasks (people exposure, fire, spills, contamination, incompatible chemical reactions) and II) ensure a Procedure with an emergency action plan is in place. The document is based on relevant standards, including ISO 45001 (occupational Health & Safety), ISO 14001 (environmental management systems), ISO 13485 (medical devices – Quality management systems), ISO 9001 (quality management systems), and the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). Requirements for the prohibited and restricted chemicals list and Priority Chemical Levels (PCL) rules apply globally at EssilorLuxottica, even where local regulations are less stringent.	EHS	Own operations	Internal	E2 S1
Group Water Management Policy	The objective of this document is to outline management methods and parties involved in water conservation, with the aim to: • ensure sustainable sourcing and use of water including marine resources; • minimizing water consumption and enhance water efficiency; • prevent and reduce water pollution and protecting surface and groundwater quality; • promote water recycling and reuse wherever feasible; • increase employee awareness in water efficiency management; • minimizing adverse impacts on ecosystems, biodiversity and local communities. It is also guided by the United Nations 2030 Agenda, SDG 6, which promotes actions to ensure access to clean water for all. All EssilorLuxottica entities are responsible for managing water withdrawals and discharges in full compliance with applicable local regulatory requirements.	EHS	Own operations	Internal	E2 E3

Document	Main content	Function	Scope	Availability	ESRS
Environmental compliance policy	The purpose of this document is to define the management methods and responsibilities related to environmental compliance across all Group activities. In particular, it aims to: • ensure compliance with all applicable local environmental regulations and laws; • extend Company-wide awareness of the relevance of regulatory compliance; • clarify roles and responsibilities for environmental compliance, along with related control principles; • define the rules and guidelines necessary to meet environmental compliance objectives; • regulate the responsibilities of the involved parties, and the associated control mechanisms.	EHS	Own operations	Internal	E2
Group Waste Management Policy	The objective of this document is to regulate management methods and parties involved in relation to waste management (including wastewater cases), including: • guidelines and key principles for managing and prioritizing waste streams safely, in accordance with environmental, legal and technical responsibilities, from point of generation to end treatment, for EssilorLuxottica sites; • requirements for proper storage, identification, transportation, treatment by waste service providers, audits and traceability.	EHS	Upstream and own operations	Internal	E3 E5
Group Circularity Policy	The objective of this document is to regulate the management methods and parties involved in relation to circularity. In particular, the purpose of this document is to: • provide a structured framework to align the Group's actions, governance and performance metrics in support of its transition toward a circular economy; • define rules and guidelines that must be followed to guarantee consistency, transparency and accountability in implementing and communicating the Company's circularity efforts; • ensure compliance with circular economy regulations; • state roles and responsibilities in defining and implementing circularity within the Group.	Corporate Sustainability	Own operations	Public	E5
Sustainable Packaging Policy	It sets the Group's commitment to incorporate a "design for sustainability" concept in the ideation phase. This mainly consists in the elimination of unnecessary layers and creation of new concepts, such as "easy to disassemble" and "foldable design" to optimize space needed for shipments and end-of-life management for packaging components. It also states that the choice of materials should be oriented toward certified renewable and/or recycled sources (i.e., responsible sourcing of materials).	Product & Operations Sustainability	Upstream and own operations	Internal	E5
Point of Purchase (POP) Sustainability Policy	It gives guidelines for new POP developments, such as: • incorporating a "design for sustainability" concept and responsible sourcing of materials, same as packaging guidelines; • selecting manufacturing suppliers that are resource- and energy-efficient; • considering efficient transportation, with network optimization and modal shift.	Product & Operations Sustainability	Upstream and own operations	Internal	E5
Material Recycling Policy	The objective of this document is to regulate management methods and parties involved in relation to material recycling, including: • guidelines and key principles to assess a material recycling solution, externalized with a third party, for EHS teams, sourcing entities or any people or entities within EssilorLuxottica, involved in the definition and launch of a new material recycling solution or a new material recycling stream; • orientation to efficiently design an acceptable recycling stream and list some limitations.	EHS	Upstream and own operations	Internal	E5

Document	Main content	Function	Scope	Availability	ESRS
SpeakUp platform + Group Reporting Policy	The SpeakUp platform, guided by the Group Reporting policy, is available 24/7 in 19 languages and supported by hotlines in 11 countries to report violations such as corruption, Human Rights issues, moral or sexual harassment, discrimination, violence at the workplace, labor laws, Health & Safety concerns, fraud and more. The Group Reporting (whistleblowing) Policy outlines who can report concerns through the SpeakUp platform and how reporting can be done, ensuring confidentiality, protecting against retaliation, and supporting effective compliance management. The Group Reporting Policy was released in 2022 in accordance with the European Directive on the protection of whistleblowers and available in 10 languages via SpeakUp. Where required, appropriate consultation of employee representatives was conducted. The policy is being progressively "localized" to take into effect the specific transposition of the directive in the European Union; a North America version has also been issued. The policy transparently describes reporting processes and statutory protections for whistleblowers and facilitators, personal data protection principles for the purposes of the reporting process, and governance, reporting and audit procedures.	Compliance/ Human Resources	Value chain	Public	S1 G1
Global Diversity, Equity & Inclusion Policy	The policy outlines the Company's principles and commitments in DE&I areas, which are closely linked to employee well-being and retention and focuses on: • key processes for integrating DE&I principles, including Employer Branding, Talent Attraction and Acquisition, Onboarding, Performance Management and Development, Salary Equity, Engagement and Well-being, Prevention of all forms of abuse, and Support for Parenthood and caregiving; • the main dimensions driving the DE&I agenda, such as Gender Equality, Gender Identity and Sexual Orientation, Parenthood and caregiving, Age and Generations, Disability, Ethnicity, Religion, and Culture.	Human Resources	Own operations	Public	S1
Global Policy on Engagement & Well-being	This policy is designed to enhance employee well-being through a comprehensive approach, covering areas such as healthcare, active lifestyle and healthy eating habits, and offering psychological assistance. Additionally, it prioritizes flexible working arrangements, and regular employee feedback through listening campaigns.	Human Resources	Own operations	Internal	S1
Global Policy on anti-harassment and discrimination	This policy affirms the Company's zero tolerance for any form of discrimination or harassment, ensuring a workplace where all employees are treated with dignity, respect and fairness. It underscores the commitment to fostering an inclusive and equitable environment free from bias, intimidation, or misconduct.	Human Resources	Own operations	Internal	S1
Global Policy on Salary Review	This policy outlines the guidelines and procedures for the annual salary and promotion process, aiming to attract, retain, and motivate high-performing employees. It ensures equity, transparency and alignment with company goals, upholds the principles of equal pay and performance-based rewards through the "OnePerformance" framework, and promotes a merit-based culture that recognizes contributions and supports personal and organizational growth.	Human Resources	Own operations	Internal	S1
Global Policy on Employer Branding and Talent Attraction	It establishes the approach to Employer Branding and Talent Attraction, aimed at enhancing the Company's global presence and attracting top talent through a unified and compelling brand. It influences both employee engagement and talent attraction. It ensures equity and inclusivity are enforced in processes and mirroring in the reputation.	Human Resources	Own operations	Internal	S1

Document	Main content	Function	Scope	Availability	ESRS
Global Parenthood Policy	The Parenthood Policy applies globally in compliance with local laws, and covers permanent and full-time employees unless otherwise agreed with HR. It guarantees at least 12 fully paid weeks of maternity leave with dedicated support programs and 10 fully paid days of paternity leave. Equal treatment is ensured for LGBTQIA+, foster and single parents, while at least 3 fully paid days are granted in case of parental bereavement. The policy guarantees job protection and non-discrimination and promotes work-life balance through flexible leave and work arrangements such as part-time, remote work and flexible hours.	Human Resources	Own operations	Internal	S1
Global Policy on Onboarding	The policy formalizes EssilorLuxottica's standard practices on Onboarding and induction.	Human Resources	Own operations	Internal	S1
Global Policy on Performance management, succession plan and development	The policy formalizes the overall performance management process free of any discrimination and in the light of meritocracy.	Human Resources	Own operations	Internal	S1
Global Procedure on Talent Acquisition	It formalizes an unbiased and discrimination-free talent acquisition process.	Human Resources	Own operations	Internal	S1
EssilorLuxottica Machinery Safety Policy (ELMS)	The purpose of this policy is to: • harmonize the safety levels of new machinery to ensure employees use it with an appropriate level of safety; • propose training for employees to increase skills and competences; • define guidelines that must be followed when acquiring new versions of machinery; • define guidelines that must be followed to manage the Transfer of Machinery and Existing Machinery.	EHS	Own operations	Internal	S1
Group EHS Roles and Responsibilities policy	The objective of this policy is to define the roles, responsibilities and authority of specific functions at EssilorLuxottica in relation to environment, health and safety (EHS) matters, in particular to: • define and establish resources, roles and responsibilities; • ensure the proper functioning of EHS practices globally to promote EHS protection across business operations; • ensure compliance with regulations/laws and assign areas of responsibility to the roles defined above.	EHS	Own operations	Internal	S1
Group Ergonomics Risk Assessment Procedure	The objective of this document is to outline management methods and parties involved in relation to ergonomics, notably to: • define minimum requirements to assess and reduce ergonomic risks by following ergonomic principles; • propose training for employees to increase skills and knowledge; • ensure new machinery complies with ergonomics specifications, local regulations and internal requirements.	EHS	Own operations	Internal	S1

Document	Main content	Function	Scope	Availability	ESRS
EHS Global Incident and Investigation Policy	The objective of this document is to outline management methods and parties for the incident reporting and investigation process. In particular, the purpose is to establish requirements for the recording, reporting, analysis and communication to EHS corporate functions on incidents. For the investigation process, this policy also serves to (once the root cause and necessary countermeasures have been identified for the site) evaluate not only the site where the event occurred but all sites/plants extending countermeasures to prevent similar incidents	EHS	Own operations	Internal	S1
Group Lockout-Tagout (LOTO) procedure	The objective of this document is to oversee management methods and parties involved in relation to Lockout-Tagout requirements to prevent release of hazardous energy sources (such as electricity, liquid, compressed air, hydraulic pressure, etc.) during equipment maintenance, installation and commissioning, and equipment modification or operation (e.g.: ensure equipment is stopped and isolated from all potential hazardous energy sources, and locked out before employees perform any maintenance or repairs on machinery; prevent any unexpected start up or release of stored energy in the equipment; stop unauthorized personnel or remote-control systems from starting equipment while it is being serviced).	EHS	Own operations	Internal	S1
EssilorLuxottica Responsible Manufacturing Policy	This Policy establishes clear guidelines for consistent procedures and standardized management practices across the organization, defines the roles, responsibilities and control principles for all stakeholders involved in the Responsible Manufacturing audit process, and sets the rules required for the effective execution of Responsible Manufacturing and Risk Management activities.	Risk Management	Own operations	Internal	S1
EssilorLuxottica Responsible Sourcing and Manufacturing program (ELRSM)	This program aims to verify the compliance of the Group's operations and value chain to international standards, all applicable laws and regulations and the Group's Code of Ethics and Business Partners' Code of Conduct. ELRSM audit checklist is composed of four main sections that refer to: • Labor & Human Rights (including topics such as working hours, wages and benefits, child and forced labor, freedom of association and collective bargaining); • Occupational Health & Safety; • Environment (e.g., energy, waste, water); and • Governance and ethics (e.g., bribery and corruption, whistle blowing procedures, etc.). Each section is composed of multiple questions and there is clear evidence of those that are essential for EssilorLuxottica. Zero-tolerance criteria are clearly expressed in the audit checklist: e.g., bribery actions, forced and child labor, retention of workers' passports or other identification papers, working time not systematically recorded, forced overtime, presence of deposit for employment, emergency exits locked or blocked as well as waste and hazardous materials disposed of without appropriate permits, registrations and licenses, etc.	Risk Management / Sourcing & Procurement	Own operations & Upstream value chain	Internal	S1 S2
Group Direct Sourcing Policy	The objective of the Policy is to establish global guidelines that ensure consistent and standardized Direct Sourcing management practices across the organization, define the roles, responsibilities, and control principles for all stakeholders involved in the Direct Sourcing process, and set the rules needed for effective execution of Direct Sourcing activities within the Source-to-Pay cycle, including supplier selection, strategic sourcing, competitive bidding and sustainability, ensuring compliance with segregation of duties, the Code of Ethics and the Business Partners' Code of Conduct.	Sourcing & Procurement	Own operations & Upstream value chain	Internal	S2

Document	Main content	Function	Scope	Availability	ESRS
Group Indirect Procurem ent Policy	The Policy regulates the management methods and stakeholders involved in Indirect Procurement by clearly outlining roles, responsibilities, and control principles and by defining the rules and guidelines that must be followed for processes such as new supplier creation, procure-to-pay, sustainability and performance measurement, ensuring compliance with segregation of duties, the Code of Ethics, and the Business Partners' Code of Conduct.	Sourcing & Procurement	Own operations & Upstream value chain	Internal	S2
EssilorLuxottica Quality Policy	It outlines EssilorLuxottica's commitment to Quality Excellence across the med-tech and eyewear activities. The Policy defines the Company's principles to ensure safety, performance and regulatory compliance throughout the product lifecycle. It reflects the mission to protect and enhance vision and health through continuous innovation and integration of advanced technologies. Inspired by international standards such as ISO 9001 and ISO 13485, the Policy promotes a risk-based approach, customer-centric mindset, and shared culture of accountability across all functions. Quality is positioned as a core value and strategic driver supporting EssilorLuxottica's transformation and sustainable growth in the med-tech field.	Quality	Own operations	Public	S4
Consumer complaints management	Internal management procedure defining responsibilities and operating practices for collecting and handling consumer complaints from distribution channels. The procedure applies to complaints about technical problems, product safety or health issues.	Customer facing teams and Central Quality	Own operations	Internal	S4
Supplier Quality Agreements	Their purpose is to define the quality-related requirements and conditions set by EssilorLuxottica, providing a mutual understanding of key roles and responsibilities to ensure that products and/or services provided by suppliers meet specifications and comply with applicable regulations.	Quality	Upstream	Internal	S4
Data Protection Policy	This document sets out (i) the Group's guiding principles for processing personal data and coordination of data flows inside the Group, in line with applicable data protection laws and regulations (e.g., GDPR, HIPAA, CCPA), and (ii) governance structure for data protection, outlining the roles of the Group Data Protection Office and operational units. The Group Data Protection Office is responsible for guiding the organization's data protection program and creating the framework for compliance globally. The operational units are responsible for implementing appropriate controls to ensure compliance with data protection laws and regulations. This governance model creates flexibility to meet differing data protection requirements cross-regionally.	Compliance	Value chain	Internal	S4
Data Privacy Statement	This document defines principles for collecting and processing personal data when EssilorLuxottica acts as data controller or processor, ensuring compliance with legal requirements.	Compliance	Downstream	Public	S4
Data Retention Policy	This document sets guidelines for data retention and secure disposal throughout the entire data lifecycle – covering both personal and non-personal data in physical and digital formats.	Compliance	Value chain	Internal	S4
Customer-facing Privacy Notice and Cookie Notice/Cookie Banner	These documents aim at providing transparent information to consumers on data collection and processing practices, in line with applicable laws (e.g. GDPR Articles 13-14).	Compliance	Downstream	Public	S4

Document	Main content	Function	Scope	Availability	ESRS
Data Breach Policy	This Policy Establishes procedures for identifying, reporting and managing data breaches, including regulatory notifications and remediation steps, following the C.A.R.E. model: i) containing the data breach; (ii) assessing the risk(s) resulting from the data breach; (iii) reporting the data breach; and (iv) evaluating the response and recovering to prevent future data breaches.	Compliance	Value chain	Internal	S4
Data Subjects Rights Policy	This document standardizes processes for handling data subject requests (DSRs) across all entities and business units, ensuring timely and compliant responses to protect individual rights.	Compliance	Value Chain	Internal	S4
Corporate Communication Policy	This Policy outlines the procedures and guidelines that reflect EssilorLuxottica's commitment and approach to communicating and engaging with stakeholders in a manner consistent with the Company Code of Ethics and values.	Corporate Communications	Own operations	Internal	S4
Corporate Sustainability Communication Policy	This document provides an overview of EssilorLuxottica's guiding principles for governing and coordinating the Company's external and internal communication flows regarding sustainability (e.g., publications, social media, tone of voice, official source of information).	Corporate Sustainability & Corporate Communications	Own operations	Internal	S4
Marketing Copy & Claim review	This document describes the marketing copy & claim process review at global level. It provides definitions scope and guidelines to Marketing and Medical Affairs teams responsible for creating/ submitting advertising or promotional material.	Legal	Own operations	Internal	S4
Anti-bribery and Corruption Policy	The Group anti-bribery and corruption policy, released in 2022, is based on the Group anti-corruption risk mapping and is available in 13 languages on EssilorLuxottica's intranet. It was submitted for information and/or consultation with employee representatives in several countries and integrated in the internal regulations of French entities, in compliance with the Sapin II law. It includes: • executive commitment from the Chairman and Chief Executive Officer and the Deputy Chief Executive Officer of the Group, who co-signed the policy; • expectations for managers, emphasizing tone at the top and an exemplary behavior; • zero tolerance for corruption, including prohibition of facilitation payments and kickbacks; • definitions and risk scenarios related to bribery and corruption specific to the Group's activities; • preventive principles for specific risk areas, such as dealing with public officials, donations and sponsorship, gifts and hospitality, lobbying and political contributions, conflict of interest, supported by do's and don'ts; • practical measures to prevent the risk of corruption with third parties at risk, notably vendors, consultants, distributors/wholesale customers, intermediaries, as well as in relationships with licensors and franchise partners and in the retail activities and in M&A processes and with joint venture partners. It includes integrity due diligence, contractual clauses, and risk scenarios; • governance and control framework, including confidential reporting of violations through SpeakUp, EssilorLuxottica's whistleblowing system.	Compliance	Own operations	Internal – Guidelines published on Group's website	G1

Document	Main content	Function	Scope	Availability	ESRS
Conflict of Interest Policy	The Group Conflict of interest policy is available in eight languages and implemented after consultation with employee representatives. The policy defines conflict of interest, with several practical examples relevant to the Group's activity, provides resolution guidance, and includes a declaration process and a model declaration form. Group subsidiaries are required to ask new recruits to declare potential or actual conflicts of interest and to organize declaration campaigns every other year. In 2024, a new conflict of interest declaration tool was introduced for progressive deployment.	Compliance	Own operations	Internal	G1
Anti-money Laundering and Terrorism Financing policy	Launched in 2024, it sets out: • zero tolerance for money laundering and terrorism financing; • main business risks and how to address them; • payment rules; • specific due diligence requirements, based on country risk and the type and amount of transaction; • an exception procedure to address specific situations, with a specific approval process involving various functions in finance and compliance; • controls, internal reporting and escalation procedures, and record keeping.	Compliance	Own operations	Internal	G1
Antitrust policy	Adopted in 2022 and available in eight languages, it was implemented after consultation with employee representatives and was included in the internal regulation of certain subsidiaries in France. It describes: • a clear commitment of the Chairman and CEO and of the Deputy CEO of the Group to comply with competition law; • key competition law risks for the Group and the key concepts of competition law; • the competition law rules relevant to the Group including anticompetitive agreements and exchange of information involving competitors (with several examples of unlawful practices and a focus on intra-group exchange of information and the need for specific wholesale/retail vigilance, as well as the participation to trade associations), vertical agreements and unlawful practices for companies in a situation of dominance; • specific rules of conduct and mandatory training obligations.	Compliance	Own operations	Internal	G1

6 Methodology Note

Main Principles for Sustainability Data Reporting

EssilorLuxottica's Sustainability Reporting Protocol defines the reporting principles below:

Workforce-Related Indicators

The workforce reported corresponds to the total number of Company employees and agency workers at the end of the reporting period. Workforce-related indicators exclude 2025 latest acquisitions (especially Optegra, Optical Investment Group and A-Look Group).

As defined in the EssilorLuxottica Reporting Protocol, "employee" refers to a person having an employment contract directly with any entity of EssilorLuxottica; and "agency worker" refers to a person having a contract with an outside company to work for EssilorLuxottica in one of its locations or elsewhere for a temporary period. Contractors and interns are excluded from the workforce indicators.

The breakdowns (by region, gender, category, contract type and age) are presented only for employees. Geographical areas designated for presenting the workforce by region are aligned with the areas identified for 2025 revenue disclosure.

"Turnover rate" represents the total number of permanent employees who left the Group over the reporting period divided by the average number of employees with permanent contracts as of the last day of each month over the reporting period.

Health & Safety Indicators

Health & Safety indicators relate to the Company's manufacturing plants, lens laboratories and distribution centers (excluding entities acquired by EssilorLuxottica during 2025 and for which investments are needed to integrate Health & Safety reporting systems). For Operations and other activities (retail excluded), reported information covers 88% of the population. For retail activities, reported information covers 87% of the population, increasing significantly the coverage compared to last year (+8%). Indeed, the Group continued to expand its consolidation scope in 2025 including new EMEA countries and China for retail activities. Overall coverage for the whole Group represent 88% of the total headcount. The Group will continue integrating additional entities in the future to improve this coverage rate and have a more comprehensive view on H&S related KPIs.

Health & Safety indicators cover both employees and agency workers.

The indicators applied reflect results of the Company's Environment, Health & Safety (EHS) policies.

As defined in the Company's Reporting Protocol:

- the frequency rate is calculated as the number of work-related injuries with lost days x 1,000,000/total number of hours worked during the reporting period;
- the severity rate is calculated as the total number of lost days (calendar days) x 1,000/total number of hours worked during the reporting period;
- the total recordable incident rate is calculated as the total number of recordable work-related injuries x 1,000,000/total number of hours worked during the reporting period;
- the total number of hours worked is calculated as the actual hours worked from the clock-in system where applicable, and theoretical hours worked based on calculation of scheduled working days and average number of hours worked per day.

Environmental Indicators

Environmental indicators are collected to measure and monitor the environmental performance of the Company.

Energy

Energy consumption refers to all primary energy consumed during the reporting period. Related breakdowns are reported in kWh and disclosed in GWh.

- Operations: the Company collected all the available actual data during the reporting period and extrapolated the data for the residual entities not providing data. This approach enables the representation of the GHG emissions for the entire Group. The extrapolations have been performed based on the actual data collected, calculating the average consumption per headcount and per country.
- Retail: All directly managed retail stores as of June 30, 2025 (around 13,600 stores) are covered in the energy reporting. Data was reported for 10 months and extrapolated for the last two months. When energy consumption data was not available for the full reporting period, data was extrapolated and estimated based on the average energy consumption per m^2 of other stores in the same country or the same region.

In total, 19% of the energy consumption has been estimated.

Besides, the Group used the Ember database for the electricity mix of the different countries where it operates to disclose the energy types breakdown.

Water resources

Water withdrawal refers to all water drawn into the boundaries of the Company from all sources, for any use, over the course of the reporting year. The related breakdowns are reported in m^3.

- Operations: the Company collected all the available actual data during the reporting period and extrapolated the data for the residual entities not yet providing data. The extrapolations have been performed based on the actual data collected, calculating the average consumption per headcount and per country. 9% of the consumption has been estimated, thus 91% is from direct measurement;
- Retail activity water consumption is fully estimated based on benchmarking analysis and comparison with factors found in literature.

Resource use and circularity

Waste

- Operations: waste generation refers to the total weight of waste evacuated or shipped out of the Company. Associated breakdowns are reported in metric tons. The Company collected all the available actual data during the reporting period and extrapolated the data for the residual entities not yet providing data. This approach enabled the representation of the GHG emissions for the entire Group. The extrapolations have been performed based on the actual data collected, calculating the average consumption per headcount and per country. 12% of the waste generation has been estimated;
- Retail: waste generated is excluded from the consolidation.

Regarding the percentage of biological materials (and biofuels used for non-energy purposes) and percentage of secondary reused or recycled components, secondary intermediary products and secondary materials:

- the requested information has been calculated considering only plastic frames and plastic plano lenses perimeter – in terms of tons of materials purchased in 2025;
- the prescription lenses perimeter is excluded: the principle of exclusion is not linked to unavailability of data but rather to the fact that, consistently to what explained above, application of biological and recycled materials to medical devices like prescription lenses is still a challenge and EssilorLuxottica prioritizes quality. The main sustainability lever for prescription lenses is waste reduction;
- for "biological materials" the following materials for frames and plano lenses have been considered: bio-based acetate, bio-recycled acetate, Bio-polyamide (PA) and bio-rubber (TPE);
- for "secondary materials" the following materials for frames and plano lenses have been considered: recycled acetate, recycled nylon, bio-circular polycarbonate and recylced polymethyl methacrylate (PMMA).

As far as the rates of recyclable content in products are concerned, the KPI has been calculated taking into consideration EssilorLuxottica manufacturing output of sunglasses and prescription glasses, sun lenses and prescription lenses, expressed in tons of material. The percentage takes into account what is currently recyclable according to EssilorLuxottica standards (valorizing the materials), for each product category. Products that are not manufactured internally have been excluded. These are based on direct measurement.

Methodology for Calculating Greenhouse Gas (GHG) Emissions

In accordance with GHG Protocol, accounting and reporting standards for greenhouse gas emissions (http://www.ghgprotocol.org GHG emissions) are calculated and reported according to three scopes: Scopes 1, 2 and 3. The GHG emissions reported include CO_2, CH_4, N_{20}, HFC and PFC and are measured in tons of carbon dioxide equivalent (tCO_2e). The Group does not follow the ISO 14064 methodology.

The GHG emissions are calculated considering the actual data collected during the reporting period and the extrapolated one for entities that did not report data, as explained in the methodology of environmental indicators.

Scope 1

This involves three direct emission categories:

- emissions from direct on-site stationary combustion of fossil fuels, such as gas or liquid fuel. Associated upstream emissions are considered Scope 3 emissions and thus excluded from Scope 1 emissions. GHG emission factors were applied in accordance with the DESNZ, Gov UK 2025 database;
- emissions from mobile combustion related to company cars consuming fossil fuels: Emissions are calculated on contractual data provided by the main fleet management supplier. Information not available from this supplier (15%) has been extrapolated. The Group refers to the fuel consumed to calculate emissions from mobile combustion related to company cars;
- fugitive emissions from refrigerants leakages that may occur during the charging, recharging or disposal of refrigerant or air conditioning equipment on-site. Emissions are calculated considering the GWP of each F-gas from the IPCC Sixth Assessment Report (AR6). In the case of GWP not available in the IPCC report, the information provided directly from the F-gas supplier was considered. The consumption of Operations sites that did not report data (representing approximately 11% of the overall fugitive emissions) has been estimated based on headcount. Regarding Retail, 59% of data have been collected through actual records, while the residual part has been estimated based on the presence of cooling system and the m² of stores.

Scope 2

This relates to indirect emissions associated with the electricity consumption of the Company's activities, including electric vehicles owned or controlled by the Company. Scope 2 emissions were calculated according to both the location-based method and the market-based method of the GHG Protocol. A location-based method reflects average emissions intensity of grids for which energy consumption occurs (using mostly grid-average emission factor data). The emission factors for electricity were updated in 2025 based on figures provided by versions 3.10 and 3.11 of Ecoinvent. A market-based method reflects emissions from electricity that the Company has purposefully chosen.

The emission factors considered are annually updated referring to residual mix available from Ecoinvent version in use internally. If the residual mix is not available, the emission factors from the location-based method are used. Emission factors applied to Scope 2 emissions do not separate the percentage of biomass or biogenic CO_2.

Scope 3

Emissions Associated with Purchased Goods and Services

These emissions correspond to indirect emissions from the entire supply chain of purchased goods and services, from raw material extraction to the point of purchase by the Company, representing the 3.1 GHG Protocol's category "Purchased goods and services".

In 2025, the category's emissions associated with tangible products (goods) are computed based on the average-data method for 51% of the emissions, while the residual part is calculated for 43% based on a spend-based method and for 7% based on supplier-specific method. In 2025, this category has been highly affected by the introduction of the GHG emissions related to med-tech operations and by the notable growth of wearable glasses volumes. Moreover, the emissions calculation regarding few other categories of tangible products purchased have been refined in 2025, leading to a restatement of 2024 emissions to ensure yearly comparability.

Where possible, GHG emissions have been calculated using a mix of supplier-specific data and secondary data (industry averages, emission factors) obtained from Ecoinvent (v. 3.11), with elaboration based on scientific literature and/or expertise judgment or LCA studies for similar products when Ecoinvent data is not available.

The category's emissions associated with intangible products (services) are computed based on the spend-based method. The emission factors considered derive from Exiobase (v. 3.3) and Base Empreinte®, Ecological Transition Agency of the Republic of France (Agence de la transition écologique – ADEME) (v. 22.0).

Data on purchased goods is collected referring to a 9, 10, 11 or 12 months period, depending on their internal availability at year-end. For example, if 10 months data is collected, the remaining two are then proportionally extrapolated to cover 12 months. In 2025, the percentage of emissions calculated with actual data amounts to 83%. The residual part has been extrapolated based on actual data available. Data on purchased services are collected referring to a 12-month period.

The data collected directly from suppliers covers 7% of this category's emissions, while the residual part is collected referring to internal sourcing report and ERP system.

Emissions Associated with Capital Goods

These emissions correspond to indirect emissions related to the production of capital goods purchased or acquired by the Company during the reporting year, representing the 3.2 GHG Protocol's category "Capital goods". EssilorLuxottica reports the total cradle-to-gate emissions of these goods in the year they are acquired, without depreciating or amortizing these emissions over time. The category's emissions are fully calculated with the spend-based method. Applied emission factors are sourced from Exiobase (v. 3.3) and measured in tons of CO_2-equivalent per EUR (based on 2023 Euro value sourced from Central European Bank).

Emissions Associated with Fuel- and Energy-Related Activities

These emissions correspond to indirect emissions related to the consumption of fuel and energy in the Company's activities, representing GHG Protocol category 3.3 "Fuel-and-energy related activities". This category's emissions are computed on an average-data method, referring to the data collected and extrapolated for the Scope 1 and Scope 2 calculation. The emission factors considered are annually updated referring to the residual mix from Ecoinvent. Emission factors used to calculate upstream emissions of purchased electricity do not include emissions from combustion, as emissions from combustion to generate electricity are accounted for in Scope 2. Transportation & Distribution loss rates are included.

The data considered for this category is the one collected for the environmental KPIs above mentioned.

Emissions Associated with Upstream Transportation Managed by EssilorLuxottica

These emissions correspond to indirect emissions related to the transportation of products and represent the main contributor for the Company to the 3.4 GHG Protocol's category "Upstream transportation and distribution". The emissions associated with the upstream transportation managed by EssilorLuxottica are calculated on a Well-to-Wheel basis (WTW), to analyze the impact of using different energy vectors. The term Well-to-Wheel includes the underlying Tank-to-Wheel and Well-to-Tank analyses, defined as follows: i) Tank-to-Wheel (TTW) describes the use of fuel in the vehicle and emissions during the combustion phase; and ii) Well-to-Tank (WTT) describes the subrange of fuel supply, from production of the energy source (petrol, diesel, electricity, natural gas) to fuel supply (transport to the charging point or fuel pump).

The company follows the GLEC Framework 3.1 and is certified to use standard ISO 14083.

Reporting of EssilorLuxottica transportation and freight is categorized by product type:

- eyewear: finished frames, including both international and local flows;
- lenses: finished and semi-finished lenses, including both international and local flows; and
- other products/materials: including international and local flows for AFA (Apparel, Footwear and Accessories), POP (Point of Purchase), Spare Parts, Production Components, Goggles, Contact Lenses, Sun & Readers, Equipment, Instruments, Cases and Accessories.

Emissions related to the transportation and freight of each product type are also split per shipping mode:

- air shipping mode; and
- other shipping modes, including ocean, road and rail.

For certain entities that did not report physical transportation data for the full 12 months, GHG emissions were estimated based on the average of the available 2025 data (actual weight/emission segmented by business unit, transport mode and flow). Emissions based on estimations accounted for less than 5% of the total reported emissions associated with transportation.

Emissions Associated with Upstream Transportation Managed by Suppliers

These emissions correspond to the Scope 1 and Scope 2 emissions of third-party transportation companies (allocated to the reporting company that pays for the service). The emissions associated with the upstream transportation managed by suppliers are calculated with the distance-based method, which involves determining the mass, distance and mode of each shipment, then applying the appropriate mass-distance emission factor for the vehicle used. The model has been developed using different online distance calculators (Google Maps, Distance calculator; www.searates.com). The emission factors applied derive from Ecoinvent (v. 3.11).

Data are collected referring to a 9, 10, 11 or 12-month period, depending on their internal availability at year-end. For example, if 10 months of data is collected, the remaining two are then proportionally extrapolated to cover 12 months. In case country and freight type information were unknown, a worldwide distance and emission factor average was applied. In 2025, the percentage of emissions calculated with actual data amounts to 83%, as per purchased products (goods) data. The residual part has been extrapolated based on actual data available.

In line with the calculation refinement mentioned for GHG Protocol category 3.1 "Purchased goods and services", a restatement of 2024 emissions has also been applied for this category. The data collected directly from suppliers covers the 7% of this category's emissions, while the residual part is collected referring to internal sourcing reports and the ERP system.

Emissions Associated with Waste Generated in Operations

These emissions correspond to indirect emissions related to the generation of waste in the Company's activities, representing GHG Protocol category 3.5 "Waste generated in operations". This category's emissions are calculated using an average-data method, which involves estimating emissions based on total waste going to each disposal method (e.g., landfill) and average emission factors for each disposal method, and refer to the data collected for the Waste generation table reported in the Section 2.4.6 *Targets and Metrics*. To ensure the coverage of all the Company's operations activities, the waste generated by entities that have not reported data in the reporting campaign was estimated based on the actual data available by country and region. The emission factors considered derive from Ecoinvent (v. 3.11).

Emissions Associated with Business Travel

These emissions correspond to indirect emissions related to all modes of transportation used for business travel, including air travel, rail travel, bus travel and car rentals, representing GHG Protocol category 3.6 "Business travel". For the specific case of EssilorLuxottica, the following modes of transportation are considered:

- air travel: emissions from flights taken by employees for business purposes;
- rail travel: emissions from train journeys.

Since only car rental expenses are available, and the mode of transportation represents a smaller amount compared to other types of travel, it has been excluded from the reporting boundaries. The impacts related to hotel accommodation are also excluded from the assessment. In both modes of transportation considered, the category's emissions are calculated with the distance-based method.

Data is collected referring to a 9-month period. Thus, the percentage of emissions calculated with actual data amounts to 75%, while the residual part has been extrapolated based on the actual data available.

Emissions Associated with Employees Commuting

These emissions represent GHG Protocol category 3.7 "Employee commuting and teleworking". The reporting corresponds to indirect emissions related to the transportation of employees between their homes and their worksites, and considers all modes of transportation used by employees to commute. Since the indirect emissions associated with teleworking are considered as optional for the GHG Protocol and they are not particularly significant in terms of emissions for the Group, teleworking indirect emissions are excluded from this category.

To compute the category's emissions, an average-data method is applied, which involves estimating emissions from employee commuting based on specific statistical studies on commuting patterns by country. The statistical information considered refers to the most representative countries in terms of headcount, and the related results have been assumed valid for the respective regional data collected. The statistical assumptions have been updated and refined in 2025, leading to a restatement of 2024 emissions. The emission factors sourced by Ecoinvent (v. 3.11) are associated based on mode-of-transport statistics. This category's emissions do not include any extrapolation.

Emissions Associated with Processing of Sold Products

These emissions correspond to indirect emissions related to the processing of intermediate products sold by third parties after the Company has sold them, representing GHG Protocol category 3.10 "Processing of sold products". This category's emissions are calculated with the average-data method. Emission factors have been developed based on internal LCAs. This category's emissions do not include any extrapolation.

Emissions Associated with Use of Sold Products

These emissions correspond to indirect emissions related to the use of goods and services sold by the Company in the reporting year, representing GHG Protocol category 3.11 "Use of sold products". In 2025, two new streams of sold products have been added to this category, med-tech instruments and wearable glasses. This category's emissions include the Scope 1 and Scope 2 emissions of end-users and are calculated by applying a specific calculation method for direct use-phase emissions from products that directly consume energy, based on the revenue recorded per geographic area. This category's emissions are based on actual data for 95%, while the residual part is calculated referring to the latest forecast figures.

Emissions Associated with End-of-Life Treatment of Sold Products

These emissions correspond to indirect emissions related to the waste disposal and treatment of products sold by the Company at the end of their life, representing GHG Protocol category 3.12 "End-of-life treatment of sold products". This category includes the total expected end-of-life emissions from all products sold in the reporting year. For the specific case of EssilorLuxottica, biogenic emissions are not considered. The basic assumption is that the end-user disposes of the final product in general waste.

If the end-of-life treatment of the sold product is known, an emission factor sourced from Ecoinvent (v. 3.11) and corresponding to the type of treatment and the primary constituent material of the product is assigned. If the treatment is unknown, the product is assumed to be incinerated with or without energy recovery, or directed to landfill (considering an average emission factor for these three different treatments regarding general non-hazardous waste). In 2025, the percentage of emissions calculated with actual data amounts to 92%, while the residual part has been extrapolated based on actual data available. According to the new integration in the 2025 carbon footprint assessment and the calculation refinement mentioned for other categories, the emissions related to the end-of-life treatment of the sold product have also been slightly affected and restated for 2024.

Emissions Associated with Franchises

These emissions correspond to indirect emissions related to the operation of franchises not included in Scope 1 or Scope 2, representing GHG Protocol category 3.14 "Franchises". An average-data method is used, which involves estimating emissions for each franchise, based on the average Scopes 1 and 2 calculated for retail. This category's emissions do not include any extrapolation.

Emissions Associated with Investments

These emissions correspond to indirect emissions related to the Company's investments in the reporting year, not already included in Scope 1 or Scope 2, representing GHG Protocol category 3.15 "Investments". This category notably includes non-consolidated investments likely to contribute significantly to Scope 3 emissions. The Group applies (i) the investment-specific method and (ii) the average-data method to estimate Scope 1 and Scope 2 emissions associated with investments depending on the relevance and reliability of the data available.

The Company continuously seeks to improve the calculation of its carbon footprint for all the different GHG categories. Some areas of improvement involve the gathering of further supplier-specific data and emission factors, while identifying detailed emission factors for single materials within the different clusters of purchased and managed items. Wherever actual information is not available, the Group will continue to look for updated information from external databases, statistics and surveys.

EssilorLuxottica OneSight Foundation indicators

People in need equipped with eyeglasses

The "people in need equipped with eyeglasses" indicator is defined as people with uncorrected refractive error (visual acuity of 6/9 or worse) or requiring protection from the sun, who are provided with a pair of eyeglasses or sunglasses.

The cumulative number of people who were provided with eyeglasses (single vision, readers, progressive, etc.) and sunglasses through various initiatives, including the Sustainable Programming business (e.g., 2.5 NVG) and philanthropy programs (e.g., OneSight EssilorLuxottica Foundation).

Rural Optical Points (ROPs) Created

The "rural optical points created" indicator is defined as optical points located in rural/semi-urban areas, where current access to vision care is low (e.g., little/no optical shops). The Foundation defines created as rural optical points that have received its value-added support (e.g., upskilling/training, marketing, branding, fabrication) to set up/upgrade their own optical shop. Key models of rural optical points include Full Refraction Entrepreneurs, Eye Partners, Readers Access Points, Value Added Hospitals, Vision Centre.

People with Permanent Access to Vision Care

The "people with permanent access to vision care" indicator refers to the number of people who have access to a rural optical point, and access is defined as within one day's travel (return journey) to visit the rural optical point, based on the WHO guideline. This indicator is derived from multiplying the number of rural optical points in a country by their respective rural optical point multiplier. The multiplier methodology is based on the type of ROP created.

Methodology for EU Taxonomy Denominators

The Annexes to the Delegated Act require the proportion of Turnover, CapEx and OpEx associated with eligible and aligned activities to be calculated. To accomplish this task, as stated in Section 2.5 EU Taxonomy Disclosure, the Group identified its eligible activities, assessed their alignment with the applicable screening criteria and calculated the three KPIs accordingly.

Additionally, on July 4, 2025, the European Commission adopted a new Delegated Regulation (EU) 2026/73 amending Delegated Regulation (EU) 2021/2178 on the content and presentation of Taxonomy disclosures, as well as Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 regarding the simplification of certain technical screening criteria for the Do No Significant Harm (DNSH) assessment.

The main changes are:

- a simplified EU Taxonomy reporting framework;
- the application of a materiality threshold allowing the exclusion of activities below 10% of turnover, CapEx or OpEx;
- streamligning reporting templates; and
- adjustments to certain Do No Significant Harm (DNSH) criteria.

Following the expiry of the scrutiny period without objection from the European Parliament and the Council, the EU Taxonomy regulatory simplifications were published in the Official Journal of the European Union on January 8, 2026. EssilorLuxottica has applied the simplified EU Taxonomy framework in its 2025 reporting, including updated disclosure tables.

The three EU Taxonomy KPIs (turnover, CapEx and OpEx) were therefore determined based on the 10% materiality threshold. Only activities meeting this threshold were considered for detailed disclosure, while activities below the threshold were deemed non-material. The following paragraphs present in detail what has been foreseen by provision of the Annexes to Commission Delegated Regulation (EU) 2178/2021 relating to accounting items underlying the KPIs to be disclosed by non-financial undertakings in the sustainability report. This is the approach applied by EssilorLuxottica.

As mentioned in the Section 1.1 *Basis for Preparation*, new acquisitions were excluded from the 2025 sustainability reporting scope, thus Turnover, CapEx and OpEx KPIs related to the new acquisitions were considered not Taxonomy-eligible due to the unavailability of sufficiently detailed information. Starting from 2026, these new acquisitions will be integrated into the eligibility and alignment assessment.

Turnover

The Turnover KPI is calculated in line with the Regulation as the share of net turnover derived from products or services associated with Taxonomy-eligible and/or Taxonomy-aligned activities divided by total net turnover (denominator).

Numerator: The analysis was done in compliance with the six environmental objectives (climate change mitigation, climate change adaptation, the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control, the protection and restoration of biodiversity and ecosystems). As outlined in Section 2.5 *EU Taxonomy Disclosure*, EssilorLuxottica's core economic activities are not currently included in the Taxonomy Delegated Acts and therefore are not considered "eligible" or "aligned". Consequently, as in 2024, the Group did not generate any significant Taxonomy-eligible or Taxonomy-aligned turnover in 2025.

Denominator: Net turnover is defined as the amounts derived from the sale of products and provision of services after deducting sales rebates and value-added taxes directly linked to turnover. In accordance with the Regulation, the denominator corresponds to the Revenue line-item reported in Chapter 5 of the 2025 Universal Registration Document, Section 5.1.1 *Consolidated Statement of Profit or Loss*. After analysis, the Taxonomy-eligible Turnover according to the EU Taxonomy Regulation represented less than 10% of the total Group consolidated Turnover. For this reason, the indicator is considered not material for 2025, as was also the case in 2024, and no detailed Taxonomy Turnover table was disclosed.

Operating Expenses: OpEx

Denominator: For the OpEx KPI denominator[1], the Group considered the amount of costs falling into the categories mentioned by the Regulation: i) non-capitalized R&D, ii) day-to-day servicing of assets, iii) building renovation measures, iv) short term leases, v) maintenance and repairs. The following categories were excluded[2]: i) overheads, ii) raw materials, iii) labor cost operating machinery, iv) R&D project management and v) electricity, fluids or reagents needed to operate property, plant and equipment.

For all categories of the OpEx KPI, both external (outsourced activities) and internal (labor, materials and tools) costs were assessed, excluding G&A (General & Administrative) costs, and including only expenses directly attributable to a specific asset.

Based on the analysis of data extracted from management and accounting tools, Group controllers identified the share of costs attributable to the categories specified by the Regulation.

After analysis, the Taxonomy-eligible OpEx according to the EU Taxonomy Regulation represented less than 10% of the total Group consolidated operating expenses. For this reason, and consistent with 2024, the OpEx KPI was deemed not material and the numerator was therefore not calculated for 2025.

Capital Expenditure: CapEx

Numerator: For each identified eligible activity and project, the technical criteria were reviewed internally to assess Taxonomy alignment (see table in Section 2.5 *EU Taxonomy Disclosure*).

Denominator: For the calculation of the CapEx KPI denominator[3], the Group considered the increases in the period related to Property Plant and Equipment (PP&E), Intangible Assets (excluding goodwill) and Right-of-Use (RoU) assets, as reported in Chapter 5 of the 2025 Universal Registration Document, Section 5.1.6 (*Notes to the Consolidated Financial Statements*, Note 10 *Goodwill and Intangible Assets*, Note 11 *Property, Plant and Equipment* and Note 12 *Leases*). As required by the Regulation, only Additions and Business combinations in the above-mentioned notes were included excluding the effects resulting from amortization, depreciation, impairment losses, divestment, assets classified as held for sale, translation differences and other.

After applying the 10% materiality threshold introduced by Commission Delegated Regulation (EU) 2026/73, only CapEx related to activity 7.7 Acquisition and ownership of buildings met the threshold and is therefore disclosed. All other Taxonomy-eligible activities fell below the materiality threshold and were considered non-material for reporting purposes.

(1) *The proportion of OpEx shall be calculated as the numerator divided by the denominator associated with assets/processes associated with Taxonomy-aligned activities. The denominator shall cover direct non-capitalized costs that relate to: research and development, building renovation measures, short-term lease, maintenance and repair, the day-to-day servicing of assets.*

(2) *FAQ published by the EU Commission on the EU Taxonomy on February 2, 2022.*

(3) *The proportion of CapEx shall cover: the additions to tangible and intangible assets during the financial year and the additions to tangible and intangible assets resulting from business combinations.*

7 Report on the Certification of Sustainability Information and Verification of the Disclosure Requirements Under Article 8 of Regulation (EU) 2020/852, relating to the year ended December 31, 2025

This is a free translation into English of the statutory auditor's report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852 of the Company issued in French and it is provided solely for the convenience of English-speaking users.

This report should be read in conjunction with, and construed in accordance with, French law and the H2A guidelines on Limited assurance engagement - Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852.

For the year ended December 31, 2025

To the Annual General Meeting of EssilorLuxottica,

This report is issued in our capacity as statutory auditor of EssilorLuxottica. It covers the sustainability information and the information required by Article 8 of Regulation (EU) 2020/852, relating to the year ended December 31, 2025, and included in the Group management report and set out in Sections 6.1 to 6.6 of Chapter 6 *Sustainability Report* of the Universal Registration Document (hereafter "the Sustainability Report").

Our procedures, which relate to this information, have been performed in an evolving context characterized by uncertainties regarding the interpretation of the laws and regulations, and the development of established practices.

Pursuant to Article L. 233-28-4 of the French Commercial Code, EssilorLuxottica is required to include the above-mentioned information in a separate section of the Group management report. This information enables an understanding of the impact of the activity of the Group on sustainability matters, as well as the way in which these matters influence the development of the business of the Group, its performance and position. Sustainability matters include environmental, social and corporate governance matters.

Pursuant to Article L. 821-54 paragraph II of the aforementioned Code our responsibility is to carry out the procedures necessary to issue a conclusion, expressing limited assurance, on:

- compliance with the requirements set out in the sustainability reporting standards adopted by the European Commission pursuant to Article 29 b of Directive (EU) 2013/34 of the European Parliament and of the Council of 26 June 2013, as amended by Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 (hereinafter ESRS for European Sustainability Reporting Standards) of the process implemented by EssilorLuxottica to determine the information reported, including, where applicable, the obligation to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labor Code;
- compliance of the sustainability information included in the Sustainability Report with the provisions of Article L. 233-28-4 of the French Commercial Code, including the ESRS; and
- compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852.

This engagement is carried out in compliance with the ethical rules, including independence, and quality control rules prescribed by the French Commercial Code.

It is also governed by the H2A guidelines on *Limited assurance engagement - Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852.*

In the three separate sections of the report that follow, we present, for each of the sections of our engagement, the nature of the procedures that we carried out, the conclusions that we drew from these procedures and, in support of these conclusions, the elements to which we paid particular attention and the procedures that we carried out with regard to these elements. We draw your attention to the fact that we do not express a conclusion on any of these elements taken individually and that the procedures described should be considered in the overall context of the formation of the conclusions issued in respect of each of the three sections of our engagement.

Finally, where deemed necessary to draw your attention to one or more disclosures of sustainability information provided by EssilorLuxottica in the Group management report, we have included an emphasis of matter(s) paragraph hereafter.

Limits of our engagement

As the purpose of our engagement is to express limited assurance, the nature (choice of techniques), extent (scope) and timing of the procedures are less than those required to obtain reasonable assurance.

This engagement does not provide guarantee regarding the viability or the quality of the management of EssilorLuxottica, in particular it does not provide an assessment of the relevance of the choices made by EssilorLuxottica in terms of action plans, targets, policies, scenario analyses and transition plans, which would go beyond compliance with the ESRS reporting requirements.

Furthermore, as forward-looking information is inherently uncertain, actual future outcomes may differ, sometimes significantly, from the forward-looking information presented in the Group management report.

Our engagement does, however, allow us to express conclusions regarding the Entity's process for determining the sustainability information to be reported, the sustainability information itself, and the information reported pursuant to Article 8 of Regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such importance that they would be likely to influence the decisions that readers of the information subject to this engagement might make.

Sustainability information and the information required under Article 8 of Regulation (EU) 2020/852 may be subject to inherent uncertainty arising from the state of scientific knowledge and from the quality of the external data used. Certain information is sensitive to the methodological choices, assumptions and/or estimates applied in preparing it and presented in the Group management report.

Compliance with the requirements set out in the ESRS of the process implemented by EssilorLuxottica to determine the information reported, including the obligation to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labor Code

Nature of procedures carried out

Our procedures consisted in verifying that:

- the process defined and implemented by EssilorLuxottica, including the obligation to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labor Code, has enabled it, in accordance with the ESRS, to identify and assess its impacts, risks and opportunities related to sustainability matters, and to identify the material impacts, risks and opportunities, that led to the publication of information disclosed in the Sustainability Report; and
- the information provided on this process also complies with the ESRS.

Conclusion of the procedures carried out

On the basis of the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the process implemented by EssilorLuxottica with the ESRS.

Emphasis of matter

Without qualifying the conclusion expressed above, we draw your attention to the information provided in paragraph "Boundaries of the sustainability report" of Section 6.1.1.1 *General Basis for Preparation of Sustainability Statements* of the Sustainability Report which sets out the reason for excluding the end-of-year acquisitions from the scope of the double materiality analysis.

Elements that received particular attention

Concerning the identification of stakeholders

Information on the identification of stakeholders is set out in Sections 6.1.3.2 *Interests and Views of Stakeholders* and 6.1.4.1.2 *Context analysis and identification of potential ESG topics* of the Sustainability Report.

We obtained an understanding of the analysis conducted by the entity to identify:

- stakeholders, who can affect or be affected by the entities within the scope of the information, through their activities and direct or indirect business relationships across the value chain;
- the primary users of the sustainability statements (including the primary users of the financial statements).

We interviewed management and/or the persons we deemed appropriate and inspected the available documentation. Our work consisted primarily in:

- assessing the relevance of the main stakeholders identified by the entity in view of the nature of its activities and its geographical location, taking into account its business relationships and value chain;
- exercising professional scepticism in assessing the representative nature of the stakeholders identified by the entity.

Concerning the identification of impacts, risks and opportunities

Information on the identification of impacts, risks and opportunities ("IRO") is provided in Section 6.1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica's Double Materiality Assessment* of the Sustainability Report.

We gained an understanding of the process implemented by the entity to assess actual or potential impacts, whether both negative or positive, risks and opportunities, in relation to the sustainability matters mentioned in paragraph AR 16 of ESRS 1, "Application requirements", and where applicable, those specific to the entity, as presented in Section 6.1.4.1.7 *Double materiality assessment outcome* of the Sustainability Report.

In particular, we assessed the approach taken by the entity for the 2025 reporting period, as presented in Section 6.1.4.1.6 *Update framework and annual review* of the Sustainability Report, as well as the changes made, compared with the previous period, to the list of IROs.

We also appreciated the scope selected for the identification of the IROs and reviewed the information provided in this regard in Section 6.1.1.1 *General Basis for Preparation of Sustainability Statements* of the Sustainability Report.

We familiarised ourselves with the entity's mapping of identified IROs, including a description of their distribution within the entity's own operations and value chain, as well as their time horizon (short, medium or long term), and assessed the consistency of this mapping with our knowledge of the entity.

We carried out the following procedures:

- assessed the consistency of the IROs identified by the entity, in particular those specific to the entity since they are not covered or are insufficiently covered by the ESRS, with our knowledge of the entity;
- assessed how the entity has taken into account the different time horizons, particularly with regard to climate issues.

Concerning the assessment of impact materiality and financial materiality

Information on the assessment of impact materiality and financial materiality is provided in Section 6.1.4.1.4 *Assessment and identification of material impacts, risks and opportunities* of the Sustainability Report.

Through interviews with management and the examination of available documentation, we obtained an understanding of the process implemented by the entity to assess impact materiality and financial materiality, and assessed its compliance with the criteria defined in ESRS 1.

We obtained an understanding of the decision-making process implemented by the entity for the assessment of impact and financial materialities, and we evaluated the adequacy of its description as presented in Section 6.1.4.1.4 *Assessment and Identification of Material Impacts, Risks and Opportunities* of the Sustainability Report.

In particular, we assessed the way in which the entity established and applied the materiality criteria defined in ESRS 1, including those relating to the setting of thresholds, in order to determine the following material information disclosures:

- metrics relating to material IROs identified in accordance with the relevant thematic ESRS;
- entity-specific disclosures.

Compliance of the sustainability information included in Section 6 Sustainability Report of the Universal Registration Document with the requirements of Article L. 233-28-4 of the French Commercial Code, including the ESRS

Nature of procedures carried out

Our procedures consisted in verifying that, in accordance with legal and regulatory requirements, including the ESRS:

- the disclosures provided enable an understanding of the general basis for the preparation and governance of the sustainability information included in the Sustainability Report, including the basis for determining the information relating to the value chain and the exemptions from disclosures used;
- the presentation of this information ensures its readability and understandability;
- the scope chosen by EssilorLuxottica for providing this information is appropriate; and
- on the basis of a selection, based on our analysis of the risks of non-compliance of the information provided and the expectations of users, this information does not contain any material errors, omissions or inconsistencies, i.e. that are likely to influence the judgement or decisions of users of this information.

Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified material errors, omissions or inconsistencies regarding the compliance of the sustainability information included in the Sustainability Report, with the requirements of Article L. 233-28-4 of the French Commercial Code, including the ESRS.

Emphasis of matters

Without qualifying the conclusion expressed above, we draw your attention to the information provided in 6.1.1.1 *General basis for preparation of sustainability statements* in the Sustainability Report which sets out:

- the data-collection scope selected for the preparation of sustainability information excluding the acquisitions of Optegra, Optical Investment Group and A-Look Group, as well as other 2025 minor acquisitions, which were finalized at the end of 2025 ;
- in the "*Reporting Process*" paragraph, the rationale for the non-disclosure or partial disclosure of certain indicators, particularly those falling under the ESRS E2 Pollution and ESRS S1 Own Workforce standards.

Elements that received particular attention

Information provided in application of environmental standards (ESRS E1 to E5)

We set out below the elements that have been the subject of particular attention on our part as regards the compliance of the ESRS with information published in relation to greenhouse gas emissions, transition plan for climate change mitigation and metrics related to the company's waste generation as mentioned in Sections 6.2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)*, 6. 2.1.3 *Transition Plan for Climate Change Mitigation* and in the "*Waste*" paragraph of Section 2.4.6 *Targets and Metrics* of the Sustainability Report.

Our procedures consisted of:

- conducting interviews with management and the relevant responsible parties, in particular the Sustainability department, to enquire about the process implemented by the entity to prepare these disclosures and to assess them, including the description of the policies, actions and targets established by the entity;
- designing and performing appropriate analytical procedures based on this information and on our knowledge of the entity.

With respect to the information published by the entity in Section 6.2.1.8 *Total GHG Emissions (scopes 1, 2 and 3)* of the Sustainability report of the Group relating to greenhouse gas (GHG) emissions, we also:

- obtained an understanding of the GHG emissions assessment procedure used by the entity, in particular by:
  - evaluating the consistency of the scope considered for the GHG emissions assessment with the scope of consolidation of the financial statements and the upstream and downstream value chain;
  - reviewing the estimation methodology and the information sources used in preparing the key estimates on which the entity relied in producing its evaluation of its GHG emissions;
- performed certain specific tests, including:
  - assessing, on a test basis, the emission factors applied and the related conversion calculations, as well as the calculation and extrapolation assumptions;
  - reconciling, on a test basis, directly measurable data—such as energy consumption relating to Scope 1 and Scope 2 emissions —used in the GHG emissions assessment with the underlying supporting documentation.

Regarding the climate change mitigation transition plan presented in Section 6.2.1.3 *Transition Plan for Climate Change Mitigation* of the Sustainability report of the Group, our work also consisted of:

- assessing whether this transition plan reflects the objectives and commitments made by the entity's administrative and management bodies, it being specified that we are not required to express a conclusion on the appropriateness or level of ambition of the plan's objectives;
- reviewing whether the information published in relation to the transition plan complies with the requirements of ESRS E1 and appropriately describes the key underlying assumptions, it being noted that methodologies to assess the compatibility or alignment of corporate GHG reduction targets with the Paris Agreement are, to date, neither stabilised nor subject to consensus;
- performing the following procedures:
  - reviewing the decarbonisation levers identified by the entity and, for a selection of these, reconciling the estimates of their quantitative contribution to achieving the GHG emissions reduction targets with the available documentation;
  - obtaining an understanding of the process implemented to estimate, over time, the resources (OpEx and CapEx) related to climate change mitigation.

Compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852

Nature of procedures carried out

Our procedures consisted in verifying the process implemented by EssilorLuxottica to determine the eligible and aligned nature of the activities of the entities included in the consolidation.

They also involved verifying the information reported pursuant to Article 8 of Regulation (EU) 2020/852, which involves checking:

- the compliance with the rules applicable to the presentation of this information to ensure that it is readable and understandable;
- on the basis of a selection, the absence of material errors, omissions or inconsistencies in the information provided, i.e. information likely to influence the judgement or decisions of users of this information.

Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies relating to compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

Elements that received particular attention

We have determined that there were no such elements to report.

Paris-La Défense, February 24, 2026

The Statutory Auditor
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