EssilorLuxottica

Group Circularity Policy

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EssilorLuxottica

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EssilorLuxottica

1. Purpose and Scope

Objective

Sustainability is at the core of EssilorLuxottica's DNA. The Company's integrated approach to sustainable development extends to every aspect of its business thanks to the Eyes on the Planet program.

The program includes a 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.

The objective of this Group Circularity Policy is to regulate 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.

Application

The provision contained therein applies to:

- All EssilorLuxottica entities, brands, and subsidiaries;
- All product categories: eyewear, smart eyewear, lenses, instruments, packaging, apparel footwear and accessories (AFA), contact lenses, instore tools and displays;
- All functions involved in design, sourcing, manufacturing, logistics, retail, and after-sales;
- All employees, suppliers, and business partners.

This policy does not apply to joint ventures unless otherwise agreed between the partners in the JV agreement or the Shareholders' agreement.

This document does not exempt the Group from compliance with local regulations, and stricter local requirements will apply in some cases.

2. Definitions, Abbreviations and Acronyms

Recycled materials: materials that have been recovered from waste and reprocessed into new products. These materials are previously discarded and considered waste; they are collected and transformed through industrial processes to be reused in manufacturing for other purposes, reducing the need for virgin resources.

Bio-based materials: materials wholly or partly derived from renewable biological sources - such as plants - rather than from fossil fuels. These renewable resources are often used as alternatives to conventional petroleum-based materials in products like plastics, textiles, packaging, and construction.

Fossil-based materials: materials derived from fossil fuels such as crude oil, natural gas, and coal. These non-renewable resources are processed to create a wide range of products, particularly synthetic materials like plastics and chemicals.

B2B: Business-to-Business refers to transactions, relationships, or communications that occur between two businesses.

B2C: Business-to-Consumers refers to transactions, relationships, or interactions between a business and individual consumers.

Circular Services: engaging in and involving consumers in different phases of the product lifecycle to extend product life or give products a second life.

LCA: Life Cycle Assessment/Analysis is a comprehensive and scientific method for evaluating the

environmental impacts of a product, process, or service throughout its entire life cycle, from raw material extraction to disposal. This holistic approach helps identify areas where environmental improvements can be made and supports informed decision-making for more sustainable practices. LCA is pursuant to ISO 14040 and ISO 14044 international standards.

Eco-design tool: a proprietary tool, called Sustainability Assessment Methodology 2.0 (SAM 2.0), to measure environmental impact (circularity capability, resources, process efficiency along with low-impact raw materials) aligned with the Product Environmental Footprint (PEF) methodology, as well as social aspects, to support R&D teams in having an assessment while designing new products and technologies.

Single Use Plastic: a product made of plastic, specifically placed on the market to be used once and for the purpose of which it was designed. Unlike reusable plastic items, single-use plastics are not intended for repeated use and lack the durability to be repurposed.

3. Roles and Responsibilities

To ensure the effective implementation of the Circularity Policy, EssilorLuxottica focuses on establishing appropriate governance, ensuring teams have the capabilities to apply the policy, and tracking the effectiveness of circularity efforts for each entity, brand and subsidiary.

Governance

The Group commitment to circularity is a strategic priority for EssilorLuxottica and 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 Environment, Health and Safety (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. The task force's work is regularly reviewed by the Chief Operating Officer. In addition, dedicated working groups can be created for specific projects.

Implementation

Each business unit is responsible for integrating circularity objectives into its operational plans. Circularity metrics are embedded in the Group's sustainability reporting framework. Training in circular economy principles is made available to employees and key stakeholders through the Leonardo platform.

4. Reference Sources

This policy reaffirms the Company's commitment to conducting its activities in full respect of legal requirements at the international and local level. While this Circularity Policy provides an overarching framework, resource use and circularity topics are further embedded in the following Group's policies, reports and guidelines:

- Code of Ethics (link)
- Global Environment, Health & Safety Policy (link)
- Business Partners' Code of Conduct (link)
- Sustainable Packaging Policy
- Point of Purchase (POP) Sustainability Policy
- Group Waste Management Policy
- Group Material Recycling Policy
- Group Water Management Policy
- 2024 Sustainability Report (link)

5. Main areas of actions

Objectives

From product and design innovation to reimagining consumer experience and establishing new business models, we constantly question how we can better serve our consumers. Our Group circular objectives span from researching and sourcing innovative materials to shifting from fossil to bio-based and/or recycled materials across several products categories, with a special focus on limiting single use plastic. We are also increasing internal recycling capabilities and implementing circular services to extend product life or give products a second life. Lastly, since circularity begins at the very start of the innovation process, we are embedding eco-design into all our developments.

Circularity Principles

As part of EssilorLuxottica's commitment to circularity (Eyes on Circularity), we adopted a set of Circularity Principles that guide the way we design, manufacture, distribute, and recover our products and services to reduce our environmental impact:

Shifting towards circular materials

We aim to progressively transitioning from fossil-based materials by scaling up the use of bio-based and recycled alternatives across all product categories. This shift is backed by internal R&D teams, suppliers' collaboration, and robust sustainability criteria. We are also moving forward in the elimination of Single Use Plastic packaging, both on B2C and B2B streams.

Design products for circularity

From day one, we integrate circularity into our product development process. We leverage life cycle assessments (LCAs) to quantify the environmental impact of our most widely used upstream materials and internalize eco design methodologies to quantitatively assess the environmental and social impact of our new products and technologies. To this end, the Group has developed a proprietary eco-design tool, the Sustainability Assessment Methodology (SAM2.0), which is being rolled out across the Company's different divisions.

Optimize resources and processes

By improving manufacturing yields and process efficiency across operations, investing in new technologies, collaborating with our supply chain partners, we work to efficiently manage the use of resources while reducing waste, carrying on projects to recycle internal material waste for example reintegrating it into new products.

Engage and empower consumers in the circular journey

Consumers play a critical role in circularity. We encourage responsible product use and longevity by providing care instructions, offering in-store repair services and making spare parts available. We also run take-back programs that give products and materials a second life by revaluing or donating them for educational purposes. Furthermore, we are enhancing the Group internal expertise in managing the end-of-life of eyewear products, investing in dedicated areas and equipment for disassembling eyewear frames and processing materials.

These principles are aligned with recognized international standards and reflect our commitment to continuous improvement.

Monitoring

To measure our progress, we monitor a range of key indicators, such as:

- Percentage of bio-based and recycled materials used
- Percentage of innovation projects assessed using the Sustainability Assessment Methodology (SAM) tool
- Waste valorization rate (materials diverted from landfill/incineration)
- Tons of B2B and B2C single-use plastic avoided or replaced
- Waste per unit produced (grams/unit)

These metrics are reviewed internally to support data-driven decisions and are reported annually in the Group's Universal Registration Document to ensure transparency with stakeholders.

6. Language

This document is written in English. Translations of this document into other languages shall be for convenience only and in no way affect the interpretation of this document. In case of contradiction or discrepancy with versions written in other languages, the English version takes precedence.