EssilorLuxottica

Code of Ethics

2023

Foreword

Dear stakeholders,

As we advance on our journey as a unified Group and in the definition of our new shared culture at EssilorLuxottica, integrity, compliance and ethics remain at the core of who we are and the way we conduct our business. We see this as a responsibility shared by us all.
Reflecting our commitment, this Code of Ethics outlines concrete principles on how we embed and promote ethical behavior in our interactions with all our stakeholders, including employees, customers, consumers, suppliers, franchisees, licensors and shareholders. It must inspire our choices and guide our behavior every day and everywhere, making EssilorLuxottica a great company to work for and work with, in line with our Mission of helping people to "see more and be more".
As a young – albeit deeply rooted Group - our reputation is one of our most valuable assets. This is why the set of standards included in this Code cannot be compromised.
This document must be read carefully and be a part of the way you work. It is critical that its content is well known and understood by us all, as it highlights our responsibility, as a Group and as individuals, to conduct our business in an exemplary manner while continuing to grow in a responsible way.
Our future success depends on the ethical commitment of everyone in the Group.

Francesco MILLERI
Chairman and Chief Executive Officer

Paul DU SAILLANT
Deputy Chief Executive Officer

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1. A unified Code of Ethics reflecting who we are

1. A unified Code of Ethics reflecting who we are

As a global industry leader conducting our business based on firm ethical foundations, we are committed to **inspiring trust** in all our stakeholders, both as a responsible business partner and as a corporate citizen. As an employer, employee, and citizen, **each of us is an ambassador of the Group** and has a personal responsibility to adhere to this Code of Ethics.

This Code of Ethics applies to all our employees where EssilorLuxottica operates. It is also a reference for external stakeholders, including shareholders, consumers, licensors, customers, suppliers, manufacturers, consultants, distributors, joint venture partners, landlords, franchisees ("Business Partners"). Employees are expected to read, understand and apply this Code of Ethics. At any given time, they have the possibility to consult any of its chapters, to understand our standards and principles on each matter.

This Code of Ethics is a living document: it will continue to evolve as we continue to integrate, adapt, and grow our Group.

The Compliance department has primary responsibility for regularly updating the document. In doing so, it will be supported by other departments and subject matter experts.

1.1 A new Code of Ethics, at the Core of EssilorLuxottica's Culture

- **A new Code of Ethics underlying other key Group initiatives**

As we define our shared culture and values and advance on the deployment on our Group-wide Eyes on the Planet sustainability program, this Code of Ethics outlines our commitments and expectations as a Group.
This Code of Ethics embeds some of the principles supported by Eyes on the Planet and its five strategic pillars: Eyes on Carbon, Eyes on Circularity, Eyes on World Sight, Eyes on Inclusion and Eyes on Ethics.
It details in particular our commitments and expectations from employees in line with the Eyes on Ethics and Eyes on Inclusion pillars, but also reflects our wider sustainability commitments, as a global corporate citizen.

- **A reference for all employees**

This Code of Ethics:

- applies and is binding to EssilorLuxottica, its subsidiaries and all their employees, regardless of their position within the Group or location. We apply similar principles to temporary and seconded staff of external companies.
- consolidates in one document some of our key principles as a unified Group. It does not replace any existing EssilorLuxottica policies, which employees should always continue to refer to.
- replaces and supersedes the former Code of Ethics of EssilorLuxottica as well as other codes of ethics including those of Essilor International, Luxottica Group S.p.a and GrandVision.

1.2 Implementing this Code of Ethics

- **Communication and ongoing training and education**

This Code of Ethics is publicly available on our corporate website* and on our global intranet OneEssilorLuxottica. As such it is readily available to all employees and must be acknowledged by them all.

It is is currently available in several languages. In case of contradiction or discrepancy with the translated versions, the English version will prevail.

A mandatory online training module on the Code of Ethics will be available on the Group's open learning platform Leonardo and will be part of our onboarding program. Through this global environment, the aim is to foster a sense of belonging while continuing to instill our learning culture across the Group. Other types of training content will be created for employees who are not able to access the platform.

- **Setting the tone from the top**

Our Code of Ethics is designed and deployed with the involvement of the Group's top leadership, starting with the Chairman & Chief Executive Officer and the Deputy Chief Executive Officer.
All employees are expected to abide by the principles included in the Code of Ethics, but it is also the responsibility of all managers to ensure the Code of Ethics is implemented by their teams.

We expect managers to:

- lead by example, through their communication and conduct, by complying with and promoting this Code of Ethics at all times.
- ensure that the employees in their teams, as well as temporary and seconded staff, understand and comply with this Code of Ethics.
- complete the trainings relating to this Code of Ethics and ensure their teams complete such trainings.
- consult the relevant department if they have questions and report issues where necessary.

* www.essilorluxottica.com

1.2 Implementing this Code of Ethics

- **How we control the implementation of our Code of Ethics**

The control over the implementation and compliance with this Code of Ethics is based on our three autonomous so called "lines of defense":

First line of defense

MANAGERS

The purpose of the first line of defense is to conduct preventive controls prior to implementing decisions and transactions to ensure that the tasks that are inherent in an operational or support processes are performed in compliance with our Code of Ethics. Such controls are performed by the operational or support staff, or by their managers.

Second line of defense

CONTROL FUNCTIONS

The purpose of the second line of defense is to conduct controls at prescribed intervals or randomly on some or all the decisions or transactions to ensure that the first line of defense controls have been implemented properly. Such controls are performed by various departments such as Internal Control over financial reporting, Risk management or the Compliance department.

Third line of defense

INTERNAL AUDIT

The purpose of the third line of defense is to perform periodic controls to ensure that the control system complies with the organization's requirements and is implemented effectively and kept up to date. Such audits are performed by the Internal Audit department.

Reports of violation or suspected violation of this Code of Ethics made in good faith will be thoroughly investigated. Subject to applicable laws, the Group's Human Resources department will take prompt and appropriate disciplinary measures, up to and including termination of employment, in accordance with the local regulations and procedures.
Management will evaluate the disciplinary measures based on several applicable factors, to ensure consistency with laws, policies and procedures, including consistency and proportionality of disciplinary measures against the substantiated violation.

Reporting a concern or a

VIOLATION OF OUR CODE OF ETHICS

Employees and business partners can confidentially and, where applicable, anonymously report, concerns or violations, notably relating to our Code of Ethics, through our Internal Reporting system:
EssilorLuxottica SpeakUp.

https://speakup.essilorluxottica.com/

For more details, please refer to Section 6.

1.3 Common Principles

Although each of the chapters of this Code of Ethics aims at providing information on how we define ethical behavior in specific areas of the business, certain key principles apply across the board.

- **We comply with laws and apply high ethical standards when conducting business**

At EssilorLuxottica, we have a long-standing commitment to conduct our business in accordance with applicable laws and regulations, and in accordance with high ethical principles as reflected in this Code of Ethics.

Beyond requiring adherence to the laws and regulations stipulated in this document, this Code of Ethics serves to empower employees to act ethically in all areas of our business.

- **Employees must complete all mandatory educational training content**

In an increasingly regulated and complex environment, education, training and overall awareness have become essential. Dedicated programs are necessary to reinforce the EssilorLuxottica compliance culture and to enhance the understanding of our Code of Ethics as well as our policies. It is also part of the development of all our employees.

EssilorLuxottica develops educational content and awareness programs in relation to the matters outlined in this Code of Ethics, with the support of our global open learning platform, Leonardo. Employees are expected to complete all mandatory educational contents / training.

- **Employees must comply with exception procedures set out by our policies**

Certain Group or local policies are subject to exceptions. Employees are expected to comply with procedures that may be exceptionally set out by EssilorLuxottica Group or the local policies.

2. Respecting our people and communities

2

2. Respecting our people and communities

Growing our People & Talent, Promoting their Well-Being

Promoting and Respecting Diversity, Equity & Inclusion

Ensuring Health & Safety at Work

Fighting Harassment, Bullying and Violence at Work

Respecting The Principles of Freedom of Association & Collective Bargaining

2.1 Growing our People and Talents, Promoting their Well-being

- **Key principles**
- EssilorLuxottica golden rules

At the very core of EssilorLuxottica are our people, who are the key drivers of our success. Some of the ways in which we support our people include:

TALENT DEVELOPMENT

We recruit and engage our employees with a long-term perspective. Training, development and equal opportunities for everyone play an important role throughout our employees' careers. We support growth and career development and promote internal mobility through our dedicated platform One Career and talent programs.
We continuously train, educate and develop our employees, both on the job and with the support of our Leonardo platform.

EMPLOYEE SHAREHOLDING

Employee shareholding is a pillar of EssilorLuxottica's culture. It reinforces employees' sense of commitment and engagement to the Group's Mission and strategy. It also aligns their long-term interests with those of the Group and of other shareholders and provides them with an opportunity to participate in the value creation and success of the Group.

WELL-BEING

EssilorLuxottica is committed to protecting the mental and physical well-being of its people, pursuing a healthy balance between our employees' professional and personal lives. We prohibit behavior that is physically or emotionally harmful to others. Contributing to improve the quality of life or our people is a way of giving them confidence and instilling a sense of belonging to the Group.

EssilorLuxottica promotes social programs, benefits, services and initiatives that have a real impact on the life of its employees and involves its employees in various engagement and ambassadors' programs.

2.1 Growing our People and Talents, Promoting their Well-being

- Key principles
- **EssilorLuxottica golden rules**

- Offer an **engaging and motivating** workplace where everyone can unleash their full potential and express their individuality.
- Provide an environment based on **trust and respect** in which everyone can thrive, feel valued and respected as well as continuously learn.
- Foster teamwork and employee participation, by providing a **cooperative leadership style**. Encourage the representation of different employee perspectives.
- Where possible, support **new ways of working** arrangements that balance the different needs of all employees with the needs of the business.
- Encourage the deployment of employee shareholding, through programs such as Boost, provided that employees' financial investment in the Group must always remain on a voluntary basis.

2.2 Promoting and Respecting Diversity, Equity and Inclusion

- **Key principles**
- EssilorLuxottica golden rules

Collective intelligence and its diversity drive our progress. Embracing multiple perspectives and new ideas makes the work environment more enriching, enables better business decisions, and encourages innovation.

Operating across more than 150 different countries, we are dedicated to creating an **inclusive work environment** for everyone in which we embrace and celebrate the unique experiences, perspectives and cultural backgrounds that each employee brings to our workplace. We want our employees to **feel respected, valued and empowered.**

EssilorLuxottica is an inclusive, **equal opportunity employer.** We aim at facilitating the professional integration of people who are under-represented in the workforce, in particular people with disabilities and under-represented social and/or ethnic groups.

As such, we do not tolerate any form of discrimination, intimidation or harassment or any behavior or language that is abusive, offensive or unwelcome.

Our Global DE&I function establishes the Group's strategy, commitments, and goals on Diversity, Equity and Inclusion. Such goals can be achieved through various initiatives, such as the creation and operation of a global culture ambassador network comprising employees from all levels of the Group. We provide **ongoing education and training** to all employees on diversity, equity and inclusion topics.

All employees have a **safe avenue to voice their potential concerns** regarding diversity, equity and inclusion in the workplace. They are encouraged to report them to their manager, the Human Resources department or through our Internal Reporting systems, which is being integrated into a unique system EssilorLuxottica SpeakUp, with no fear of retaliation.

2.2 Promoting and Respecting Diversity, Equity and Inclusion

- Key principles
- **EssilorLuxottica golden rules**

- Treat each other with **dignity and respect** and create conditions for an inclusive workplace.
- Promote an **inclusive and positive** working environment. Managers should provide transparent, frequent communication and constructive feedback to their teams and understand the importance of actively listening to their employees and showing empathy.
- Be **open and curious** about others' experiences, perspectives and backgrounds.
- Conduct recruitment, retention, engagement, compensation and benefits, promotion, training and development on the basis of the **equal opportunities' principles**. These must also be based on fairness and meritocracy.
- Encourage teams to attend the various DE&I awareness initiatives (e.g., unconscious bias course, virtual classes on Leonardo and other events) organized within the Group.

2.3 Ensuring Health and Safety at Work

• Key principles

Health and safety at work for each employee and supplier creates substantial value for the Group.

EssilorLuxottica applies high occupational, health and safety standards to all employees, contractors and temporary staff working on all their sites, ensuring that operations are safe, and that employees, contractors and temporary staff are well protected.

To achieve this, the Group has designed policies, procedures and action plans to continuously improve, and conducts on-site audits to maintain performance.

We seek to prevent work-related injuries and occupational illnesses and achieve our vision of zero work-related accidents.

We must ensure we are not putting ourselves or others at risks through our actions.

• EssilorLuxottica golden rules

- Comply with all applicable legal environmental, health and safety requirements and group health and safety guidelines and programs in all countries of operations.
- **Never disconnect or bypass** any safety device or monitoring equipment.
- Comply with **global chemical and product safety regulations,** as well as local laws and internal rules relating to chemical management.
- Comply with the **control measures** implemented, to guarantee workers' safety and regulatory compliance, and share safety information with employees through compliant safety data sheets and labels.
- **Report any breach of safety or security** and accidents, even minor ones. If any behavior or process compromises the health, safety and security at work, report it immediately to your manager, Human Resources, EHS organization, or to our internal Reporting system, EssilorLuxottica SpeakUp.
- Complete the assigned dedicated training programs on health and safety.

Refer to our EHS Policies.

2.4 Fighting Harassment, Bullying and Violence at Work

- **Key principles**
- EssilorLuxottica golden rules

ZERO TOLERANCE

EssilorLuxottica prohibits any form of discrimination, harassment, bullying, intimidation or violence against co-workers, employees, leaders, managers, executives, candidates, customers, consumers, vendors, temporary staff, franchisee, or any other person.

EssilorLuxottica has a zero tolerance policy regarding violence or threats of violence at work (including when working remotely).

REPORT DISCRIMINATION AND HARASSMENT

Employees becoming aware of discrimination, harassment, bullying or violent behaviors have a duty to report them to Human Resources or to their manager. To that effect, they can also use the Internal Reporting system EssilorLuxottica SpeakUp available to all employees to report such behaviors in good faith, in a safe environment aiming at preserving the confidentiality of their identity and of their report, without fear of retaliation.

EssilorLuxottica will promptly and thoroughly investigate situations of discrimination, harassment or bullying that are reported to the organization and take all appropriate measures to implement an immediate, strong and fair remediation to end the discrimination, harassment or bullying.

2.4 Fighting Harassment, Bullying and Violence at Work

- Key principles
- **EssilorLuxottica golden rules**

- Always behave with **respect and courtesy** at the workplace or when conducting EssilorLuxottica's business, on all occasions and platforms (business meetings, plants, trips, social media channels, company events, etc.) and with any employee or individual, regardless of their function.

- Do not create an intimidating, humiliating, hostile or offensive working environment.

- **Refrain from any form of discrimination, bullying or harassment**, whether it is sexual (e.g. unwelcome sexual advances, physical assaults or the attempt of the same, etc.), psychological (e.g. discrediting, isolating, repeated verbal abuse, humiliating verbal or physical conduct, etc.) or on the basis of race, religion, ethnicity, nationality, sex, age, disability, sexual orientation, gender identity, marital status, past or present military service, pregnancy, or other characteristic protected by local law, it being one-off, repeated or systematic.

- Refrain from any form of **violence** (e.g., physical harm or attacks, threats, etc.), including cyberbullying (by way of email, social media, internal messenger, etc.).

- For managers becoming aware of misconduct, **deal with any allegations** without delay, seriously, confidentially, and fairly, whether there has been a written or formal complaint, and report it to Human Resources and/or to the Compliance department.

- Take all appropriate steps to **prevent, identify and end** all types of harassment and bullying, beginning by completing the related mandatory training.

Refer to our anti-harassment local policies.
Refer to our Group Reporting policy.

2.5 Respecting the Principles of Freedom of Association and the Right to Collective Bargaining

- **Key principles**

- We respect the principles of freedom of association and the right to collective bargaining consistent with applicable national laws and practices.
- We respect the right of workers to form unions in a free and democratic way.

- **EssilorLuxottica golden rules**

- We fully comply with applicable national laws in connection with freedom of association and collective bargaining.
- We do not discriminate against workers because of trade union membership.

3. CONDUCTING BUSINESS ETHICALLY

3. Conducting Business Ethically

3.1 Protecting Fair Competition

- **Key principles**

We are committed to **abiding by antitrust and competition laws and regulations**. We operate an open, choice-driven business model (network company), that creates value for all stakeholders, including customers, consumers, employees, shareholders, business partners, and suppliers as well as the communities in which the Group operates.

We promote **fair competition** among all parties, for the benefit of consumers, customers, suppliers, and the industry.

A violation of the antitrust and competition laws could expose the Group (including employees) to **significant sanctions and penalties**, including possibly criminal prosecution and civil damages, and to **reputational harm**.

3.1 Protecting Fair Competition

- **EssilorLuxottica golden rules**

- **No collusion with competitors.** Do not enter into agreements with competitors, for example to maintain or decrease the prices, exchange sensitive information or allocate customers or market shares. We forbid any form of collusion.

- **Internal exchange of information.** Avoid the internal exchange of sensitive information related to third parties between EssilorLuxottica entities active at different levels of the value chain. For example, a Group retail chain should not disclose to the in-group wholesale business the commercial conditions of lens or frames competitors.

- **Our business partners should determine their own prices independently.** Third party retailers (e.g., independent eyecare professionals and retail chains) and franchisees must be free to unilaterally determine their own prices and commercial policies.

- **No abuse of economic strength.** Do not propose net prices below costs, do preserve the freedom of the customers to buy or not several products from the Group like proposing but not imposing bundle offers, do always consult with Legal when negotiating exclusive rights to, or when asking for exclusive purchases from, customers or suppliers.

- **Distribution networks.** New existing and selective distribution networks are subject to pre-established qualitative/quantitative criteria, which must be objective, transparent, and applied in a non-discriminatory way.

- **Trade associations.** Be extremely vigilant if and when participating in trade associations, to ensure compliance with competition law. Do not interact with competitors where confidential information, notably pricing and commercial decision-making, could be discussed. Discussions on technical matters or standards are allowed, subject to prior advice from the Legal department.

Please refer to our Group Competition Compliance Policy.

3.2 Fighting Bribery and Corruption

- **Key principles**

In all its business dealings, EssilorLuxottica strives for the utmost integrity and transparency.

ZERO TOLERANCE

We have zero tolerance for any bribes and corruption committed directly or indirectly on behalf of the Group. We prohibit both corruption of public officials and commercial bribery, as well as facilitation payments. Employees should neither commit acts of bribery and corruption nor respond to undue requests and comply with applicable anti-bribery and corruption laws.

FIGHTING CORRUPTION

The Group has established a global anti-bribery and corruption program, which applies globally and provides specific rules for preventing, detecting, and managing corruption risks related directly or indirectly to the Group, including regular corruption risk assessments.

3.2 Fighting Bribery and Corruption

- **EssilorLuxottica golden rules**

- **Anti-bribery and corruption.** Strictly comply with the rules of conduct set out in our anti-bribery and corruption policy.
- **Public officials.** Exercise utmost care in communications with public officials and never offer, pay or accept to pay bribes to public officials, including facilitation or "grease" payments.
- **Gift and hospitality.** Follow the Group anti-bribery and corruption policy. Notably, reasonable gifts and hospitality are a normal part of doing business, but:

  - must not influence or appear to influence a business decision;
  - must be permitted by the internal rules of the organization of the recipient;
  - must remain reasonable, appropriate, occasional and transparent;
  - must be disclosed immediately to the manager;
  - cash gifts must always be refused.

- **Healthcare.** Comply with healthcare regulations that restrict or prohibit gifts, hospitality or certain promotions considered as "kickbacks" to healthcare professionals. Comply with applicable local reporting or publication obligations. Employees willing to provide gifts or hospitality to healthcare professionals must consult with the Compliance department, in advance.
- **Donations.** Do not make third-party donations or grant sponsorship towards obtaining or retaining contracts, to influence or appear to influence a business decision or in order to conceal the payment of a bribe.
- **Political contributions.** Do not finance or allow for any contributions to candidates, politicians, or political parties.
- **Due diligence.** Know who we are dealing with. Conduct risk-based integrity due diligence / background checks, as defined in our policies, on certain business partners at risk such as brokers, consultants, distributors and franchisees, as well as acquisition targets.
- **Intermediaries.** When transacting with third parties or intermediaries, be aware that they cannot be used to do something that our Group is not allowed to do directly.

Please refer to our Group Anti-Bribery and Corruption Policy.
(our internal Code of conduct).

3.3 Preventing Conflicts of Interest

- **Key principles**

Employees must avoid situations in which their personal interests or actions could **conflict or appear to conflict with EssilorLuxottica's best interests** and/or situations which impedes their ability to make an objective or unbiased decision.

Their personal interests or actions could for example influence a purchasing or recruitment decision, or pricing to a customer, depending on their position in the Group.

Having a conflict of interest is not necessarily a violation of our policy. In many cases, the conflict of interest that is declared may not be relevant or can be resolved by establishing mitigating controls.

- **EssilorLuxottica golden rules**

- Always act in **EssilorLuxottica's best interests** when performing your duties.
- Refrain from taking part in any business decision implying a potential or actual conflict of interest.
- **Report timely and in good faith** to the relevant HR reference person any potential or actual conflict of interest situation and update such declaration as appropriate. Disclosing a potential conflict of interest is the best way to protect both our Group and its employees.
- Regularly implement conflict of interest disclosure procedures as per our Group policy, including upon recruitment of new employees.

Refer to our Group Conflict of Interest Policy – Several examples are available.

3.4 Fighting Anti-Money Laundering & Countering the Financing of Terrorism

- **Key principles**

At EssilorLuxottica, we reject any attempt to use our business to launder money. Our policy is to comply with all applicable anti-money laundering regulations in our operations worldwide. Money laundering is considered a criminal offense in many countries, and is increasingly regulated in all fields of activity. To this end, we seek to conduct business only with customers, partners, contractors, sponsorship or donations partners who are involved in legitimate business activity and whose funds are derived from legitimate sources.

- **EssilorLuxottica golden rules**

- Process payments in accordance with our policies and procedures and comply with our internal vendors and other third-party creation procedures, including procure to pay procedures.

- Be careful when asked to process or receive **unusual cash payments** or payments from countries considered high risk for money laundering or terrorism financing, from countries considered to be tax havens or offshore jurisdictions, or from countries that are unrelated to the transaction or not logical for the customer or the vendor. Comply with local legal thresholds about cash payments.

- Apply our internal **due diligence** procedures on third parties at risk or in presence of red flags.

- Be vigilant about potential **red flags**, such as the customer refusing to disclose information about its business or asking to ship goods to a different legal entity.

- Refer any question or suspicion of money laundering activities to EssilorLuxottica SpeakUp or the Compliance department.

3.5 Protecting Personal Data and Privacy

- **Key principles**

In an increasingly global and digital environment, protecting the privacy and personal data of all relevant stakeholders is a key priority for our Group. We strive to protect the privacy of our employees, suppliers, customers, consumers and other Business Partners, all over the world.

EssilorLuxottica firmly abides by applicable privacy laws and regulations. It is the responsibility of each and every Group employee and we expect the same from our vendors and contractors involved in the processing of personal data.

Failure to comply with privacy rules may expose the Group to extremely high financial penalties and civil suits, as well as business and reputational damage.

- **EssilorLuxottica golden rules**

- **Protect personal data and keep it secured.** Seek support from the Compliance department and the Information Security department. When processing personal data on behalf of our customers, apply a level of protection as close as possible to how we implement in our own operations.

- Exercise particular care in protecting **sensitive personal data**, in particular health or financial data, unique personal identifier, biometric or geolocation data.

- Do not collect more data than necessary, keep it up to date and implement internal data retention policies.

- Ensure appropriate information is delivered to (our employees, customers, etc.) about the personal data we process.

- When designing a new service or business process that makes use of personal data, take the protection of personal data in consideration as soon as practicable, from the conception of the project until its implementation and follow-up.

- Do not sell the data of our employees, customers or other business partners.

- Ensure that our business partners and franchisees strictly abide by the prevailing privacy laws.

- Immediately report to your manager or privacy@essilorluxottica.com of any data breach or incident, including unauthorized access, that may affect personal data, so the Group can initiate an appropriate response.

Refer to our Group Data Protection Policy and Group Data Breach Policy.

3.6 Complying with Trade Sanctions and Export Control

- **Key principles**

At EssilorLuxottica, we are committed to complying with applicable international trade sanctions, embargos and export control laws of countries where we operate. Any failure to abide by such regulations is likely to carry extremely detrimental consequences for the Group, including high fines and criminal sanctions. Respecting trade compliance reduces the risk that our goods or technology end up in the wrong hands.
EssilorLuxottica only exports goods, services and technologies to companies and countries that comply with applicable export control and non-proliferation laws.

- **EssilorLuxottica golden rules**

- Comply with applicable laws about economic sanctions, export control and customs, and with our internal trade compliance policies.

- Be careful when dealing with business partners in **countries designated as high and medium risk** in our trade compliance policies and comply with our due diligence /screening procedures.

- Follow the **internal approval process** set out in our trade sanction and export control policies and procedures and report the required details to the Compliance department. Immediately **stop or do not pursue** transactions for which the due diligence or screening reveals that the transaction is not permitted or becomes prohibited under the applicable sanctions' or export control regime.

- Contact the Compliance department timely for any exporting or re-exporting of goods, software and technologies which may be used for both civil and military purposes ("dual-use" items). External vendors handling export control must be validated by the trade compliance officers.

Refer to our Group Trade Sanction Policy.

3.7 Preventing Insider Trading and Stock Market Abuses

- **Key principles**

Insider trading conflicts with the basic principle that everyone dealing on the stock exchange should simultaneously have access to the same information. Insider trading and other forms of market abuse, such as "tipping", can have serious consequences under administrative, criminal and employment law.

The shares of EssilorLuxottica are traded on the Paris stock exchange. Whether employees hold EssilorLuxottica shares as a result of employees' shareholding plans or otherwise, they are not allowed to trade in EssilorLuxottica securities when they hold inside information, due to their work in the Group or otherwise.

Inside information is essentially any undisclosed information that could affect the trading price of EssilorLuxottica securities, such as shares or debt instruments, rights to such shares or debt instruments or related derivative instruments such as financial futures, swaps, and options. In case of any doubts as to whether you are dealing with inside information, please contact the Legal department and/or the Investor Relations department.

EssilorLuxottica prepares and maintains lists of persons who, due to their function or position, are deemed to have constant access to all inside information on a permanent or on a temporary basis due to circumstances such as a specific important contract, project, financial or corporate event, announcement of profits materially different than expected.

These persons are informed about the fact that they are on insiders lists and about the subsequent restrictions regarding their possibility to trade in EssilorLuxottica's securities.

- **EssilorLuxottica golden rules**

- Do not engage in insider trading and purchase or sell (or attempt to do so) any EssilorLuxottica securities, while in the possession of inside information.
- Do not purchase or sell any EssilorLuxottica securities in violation of restrictions in dealing with EssilorLuxottica's securities, where the Legal department or the Employee Shareholding department has prohibited EssilorLuxottica employees from doing so. The restrictions for permanent and Temporary Insiders apply regardless of whether the employee in question possesses any inside information.
- Do not disclose inside information to any third party unless the disclosure is made as part of the employee's regular duties and the recipient of the inside information is under an obligation of confidentiality.
- Do not explicitly or implicitly advise a third party – based on inside information – to purchase or sell any EssilorLuxottica Securities ("tipping").

3.8 Ensuring Transparency of Information

We believe in providing transparent, timely, fair and accurate information to employees, shareholders, investors as well as to customers and consumers.

To this end, we maintain a constant dialogue with the financial community in compliance with current regulations regarding corporate and price sensitive information.

We also seek to offer the most complete and accurate information about our products and services, their quality and origin. At the same time, we aim at maintaining a regular and pro-active dialogue with all other stakeholders so that we can continuously respond to their needs and expectations.

3.9 Keeping Accurate Books & Records

- **Key principles**

EssilorLuxottica seeks to ensure we keep complete and accurate books and records and other relevant documents. Employees who have custody of books and records are responsible for their accuracy and security.

- **EssilorLuxottica golden rules**

- **Accurate books and records.** All our financial and accounting books and records must follow the corporate guidelines and be accurate.

- **Petty cash**. Petty cash, by its nature (cash is sometimes kept for small payments), can easily be a mechanism for making corrupt payments and as such all petty cash transactions, must be approved in accordance with Group policies and procedures and recorded in a timely manner. In general, it is the policy of the Group to limit or eliminate, as far as practicable, cash transactions. Cash reconciliations must be done in accordance with Group standards.

- **Documentation.** Transactions must be adequately supported by appropriate documentation.

- **No falsification.** It is prohibited to omit or falsify entries in our books and records.

- **Report.** Employees must report to the Internal Audit department, the Internal Control department or to the Compliance department any suspicious operation or falsification of books and records. They can also use our Internal Reporting system EssilorLuxottica SpeakUp to do so.

4

PROTECTING OUR ASSETS

4. Protecting our assets

BRANDS & INNOVATION

CYBERSECURITY

FIGHTING FRAUD & THEFT

IT AND SOCIAL MEDIAS

4.1 Protecting Intellectual Property, Brands and Innovation

- **Key principles**

Intellectual Property ("**IP**") is an **extremely sensitive** and important topic for EssilorLuxottica. Our rich portfolio of eyecare and eyewear-related trademarks, domain names, copyrights, patents, designs, know-how and technologies are one of the foundations of EssilorLuxottica's business. Prestigious licensed brands are also part of the EssilorLuxottica family. We take the utmost care to secure our IP (including our know-how) as well as the rights of third-party licensors.

Our brands and innovations are at the core of our Group as key equity elements and must be respected. A global framework has been put in place to secure their use and protect them. It includes awareness, clearance processes, trainings, and strategic monitoring.

We also **fight against counterfeiting** and look-alike as well as the expansion of parallel market that diverts goods to unauthorized sales channels. Dedicated resources are devoted to the protection and enforcement of EssilorLuxottica's IP. We strive to respect the talents, creations, investments, perseverance and vision of all innovators and entrepreneurs. We take the utmost care to protect our creations and innovations through appropriate IP rights or trade secrets. We are responsible in respecting the rights of third parties. All employees can participate in the Group's efforts to fight against counterfeiting and protect our brands.

4.1 Protecting Intellectual Property, Brands and Innovation

- **EssilorLuxottica golden rules**

- Respect required steps for the **filing of patents, designs, trademarks and domain names** at the earliest stage, before any oral or written disclosure.
- Respect the intellectual property of third parties and seek advice from our Legal and Intellectual Property departments ahead of projects and product launches.
- Be aware that to be valid, licensing, acquisition or sale of intellectual property must be **in writing**. Contact IP and Legal departments as soon as possible for any plan of licensing, acquiring or selling intellectual property, including before collaboration with third parties that may involve intellectual property.
- Report suspicious contents and suspected fake products through a dedicated email address **reportfake@essilorluxottica.com** to kickstart investigations, or to the Legal and IP departments.
- Strictly observe **confidentiality and discretion** about the operations of the Group, internally and externally, as well as all frameworks implemented by the Group to secure and protect our innovations and IP (including those of our license partners).

4.2 Protecting and Securing Information – Confidentiality and Cybersecurity

- **Key principles**

Given the **increase of cyber threats** globally, **cybersecurity is of utmost importance** to us and each employee has a role to play in protecting our systems and information.

The protection of information, both in electronic and paper form, is a fundamental principle for the continued success of the Group's business activities. The disclosure of internal information can be detrimental to our business. As information is valuable, it is crucial to ensure its protection. Our business partners, who have access to our confidential information, are under a similar obligation as the Group's employees to protect information from disclosure.

EssilorLuxottica prohibits the improper or illicit use or disclosure of **confidential information**, either internally or externally, as well as the dissemination of false or misleading information.

- **EssilorLuxottica golden rules**

- **Be extremely vigilant to potential fraud, scam, suspicious emails or links and phishing attempts. Use strong passwords, never share them and use multifactor authentication.**
- Comply at all times with Information security policies and instructions. Complete mandatory Information Security training courses on Leonardo.
- **Involve IT Security / Information security in projects** involving software, applications or systems, for example before engaging IT vendors (including for application development), especially if they may be granted access to our systems.
- Comply with internal procedures related to **payment security and credit card security.**
- Secure the integrity of information and ensure proper access controls to systems.
- Immediately report any security incident to the Information Security department.
- Treat as strictly confidential EssilorLuxottica-related documentation and information, unless and until it is in the public domain. Only share information on a "need-to-know" basis and comply with Group prescribed confidentiality markings.
- Ensure that confidentiality agreements, with appropriate scope, legal entities and authorized signing persons, are signed before sharing confidential information externally.

Refer to our Information Security Policies.

4.3 Information Systems, Internet and Social Media

- **Key principles**

Information systems are a fundamental way to share our pursuit of innovation and excellence with customers and consumers.

Together with our stakeholders, EssilorLuxottica strongly supports an open, constructive and transparent dialogue, seeking opportunities to do this through social media, as well as through traditional channels.

Our communication and behavior in the professional sphere reflect on the Group's reputation. Employees are expected to show restraint, respect for others and not to share confidential information, including when using social media.

- **EssilorLuxottica golden rules**

- Do not communicate externally or internally on behalf of the organization **without the authorization** of the Head of department and do not discuss information about the Group that is not in the public domain.
- In case of solicitation by media to speak about the Group, do not respond and immediately **refer the media or question to the Corporate Communications department.** If the topic is on sustainability, the media or question must be referred to both the Corporate Communications and the Corporate Sustainability departments.
- Be extremely **vigilant** when publishing content on the Internet and **use social media carefully**. Specify that your remarks reflect only your personal views. Always be transparent and honest about the role you play in the Group.
- Protect the Group's assets (phones, networks, computer systems, corporate emails…) and do not use them inappropriately.

Refer to the Group Corporate Communication Policy.
Refer to the Group Sustainability Communication Policy.
Refer to Information Security Policies.

4.4 Fighting against Fraud and Theft

- **Key principles**

EssilorLuxottica **condemns all forms of fraud or theft**, whether the Group is a victim of it or would stand to benefit from it.

It does not just happen to others. Everyone is at risk.

Fraud can take many forms, either by the means used (such as forgery, use or production of counterfeit money or goods, concealment of income, concealment of evidence, abuse of trust) or by the nature of the fraud itself (for example: asset misappropriation, theft, scams, tax fraud, social security fraud).

In a business environment, a common type of fraud is the **falsification of documents** or the production of **false accounting information**, which can lead to embezzlement, fraudulent use of equipment, or undue advantages such as a tax cut.

We also condemn any form of theft, including theft in the Group's premises, stores or plants or during transportation. The Group Asset Protection team protects people as well as tangible and intangible assets from any intentional abuse or misuse of Group properties and resources.

- **EssilorLuxottica golden rules**

- Follow all Group **procedures** (vendor creation, procure to pay…).
- **Be vigilant** when responding to emails or requests, even when they seem legitimate.
- **Screen potential external fraudsters**: e.g., use of software for changing names or phone numbers to look like internal contacts; use of email address very close to the Group / vendor/ bank domain, emails or calls impersonating the Group's top executives, etc.
- Be vigilant about any request of change of payment details: e.g., verify the call identity, always apply "call back" procedures, be extra vigilant to urgent payment requests or payments to another country.
- **Maintain controls** to ensure that Group assets are properly controlled and protected, that transactions are executed only with the proper authorization, and that transactions are properly and accurately recorded, with attention to the quality of the information being reported.
- **Report fraud suspicions** to your manager, to the Internal Audit or Asset Protection or to our internal Reporting system, **EssilorLuxottica SpeakUp**.

5

ACTING AS RESPONSIBLE CORPORATE CITIZENS

5. Acting as responsible corporate citizens

HUMAN RIGHTS

SUSTAINABLE SUPPLY CHAIN

MISSION

ENVIRONMENT

TRANSPARENT ADVOCACY

5.1 Protecting Human Rights & Labor Conditions

- **Key principles**

EssilorLuxottica is built upon two centuries of innovation and human endeavor. We aim to respect and promote human rights in all our businesses across our supply chain.

The Group has placed particular importance on applicable laws, regulations and international standards such as the United Nations Guiding Principles for Business and Human Rights.

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 Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO).

We attach particular importance to identifying and monitoring risks, as well as preventing and remediating material breaches of human rights and fundamental freedoms, that could arise as a result of our activities, those of our subsidiaries, and those of our suppliers and subcontractors in the supply chain.

Consequently, we expect from our subsidiaries and operations, and from our supply chain in general, that their operational practices **comply with applicable laws** and regulations and, more generally, they **protect the dignity of human beings**. The rules set out below should be applied to temporary or seconded staff and across our supply chain.

5.1 Protecting Human Rights & Labor Conditions

- **EssilorLuxottica golden rules**

- **No Child Labor.** Hiring of individuals (either employees or temporary staff) below 16 years of age (or under the legal minimum age for employment in the applicable country or jurisdiction, whichever is higher) for work is strictly prohibited. Hiring of individuals (either employees or temporary staff) below 18 years of age for positions involving hazardous work is also strictly prohibited. When hiring trainees or apprentices, we must comply with applicable regulations, that they are not subject to long hours interfering with their education and that their mission is strictly related to their education.

- **No Forced Labor & Human Trafficking.** EssilorLuxottica does not resort to forced or compulsory labor in any form whatsoever, in their operations. All forms of human trafficking during employment either directly or through contractors are strictly prohibited.

- **Decent Working Hours.** EssilorLuxottica ensures that employees do not work longer than the maximum number of working hours and overtime when defined in the existing local or national laws. Principles regarding working time, overtime and rest periods should be clearly explained to workers during the recruitment process or upon their request, in a language they understand.

- **Migrant Workers Fair Working Conditions.** EssilorLuxottica entities safeguard and prevent infringement of migrant workers' fundamental rights and provide them with fair and decent working conditions (notably, no charging of workers with employment fees, no abusive retention of identification documents, clear and understandable contracts, decent living conditions).

- **Fair Remuneration.** Compensation and benefits provided to workers must comply with local laws when they exist or with applicable collective agreements, including legal minimum standards where applicable. In all cases, EssilorLuxottica entities seek, as a minimum, to provide a fair compensation for each employee.

- **Adequate Social Benefits & Social Security.** Employees should be provided with adequate social benefits and social security, in compliance with local laws. All relevant social security contributions should be paid, collected and submitted.

- **Contractors.** Employees should ensure that contractors comply with these rules, including in their own.

5.2 Implementing a Sustainable Supply Chain

- **Key principles**

For EssilorLuxottica, supply chain efficiency is fundamental to guarantee the high quality of its products and services and contributes to maintaining and enhancing the Group's reputation.

EssilorLuxottica seeks to work with suppliers whose operational practices comply with applicable laws and regulations and, more generally, that protect the dignity of human beings, the health and safety of workers and the environment at large, including across their own supply chain. In this respect, the Group has launched a unique **EssilorLuxottica responsible sourcing program** leveraging the existing responsible sourcing standards and initiatives. The program contains the standards of ethics, labor, health, safety and the environment and requests all the Group's suppliers to adhere to these.

Supplier risk assessment and on-site audits are at the core of EssilorLuxottica's responsible sourcing program and are complemented by dedicated educational and awareness initiatives. Consequently, suppliers support the Group's commitment to ensure respect for human rights and the environment.

The Group is also implementing procedures to **verify the integrity and sustainability** of its suppliers, distributors, franchisees, and other business partners that must respect a common set of working principles.

The Group is working on a Unified Code of Conduct that will outline the sustainability principles that we expect from our Business Partners.

It is the responsibility of all employees to remain vigilant about the third parties that will engage with the Group.

- **EssilorLuxottica golden rules**

- Ensure that suppliers, distributors, franchisees and other Business Partners acknowledge and respect our existing and upcoming Sustainability Code of Conduct (or any equivalent document) on topics such as business ethics, trade sanctions, human rights and labor standards, environment, health and safety, information security or personal data protection.

- Comply with Group procedures to **evaluate** the supplier's environmental and social performance, as well as their business integrity, and **train** them on sustainability and integrity principles and practices, and exercise appropriate **due diligence**. Involve the Procurement department in the selection process.

5.3 Committing to the Environment

- **Key principles**

From fighting climate change, managing and reducing water use at manufacturing sites, improving occupational health and safety, and ensuring equal opportunities to engaging local communities in outreach initiatives, the Eyes on the Planet sustainability program consistently supports the Group's Mission.

EssilorLuxottica's sustainability efforts extend to our subsidiaries in terms of environmental footprint reduction (e.g., energy optimization) and social impact on employees (e.g., development opportunities and mobility) and communities (e.g., access to quality eyecare).

Our compliance with environmental laws and goals towards carbon neutrality, circularity and environment reaffirm how our Mission, sustainability and business strategy are strongly intertwined at EssilorLuxottica.

All EssilorLuxottica's businesses and departments contribute to the Group's sustainability journey, whether in R&D, Operations, offices, subsidiaries or in our retail stores. Examples include the design of new lens technologies or frames (e.g., use of bio-based materials), water / waste reduction and recycling initiatives in our factories, distribution centers, offices and stores.

In addition, employees are encouraged to attend education and awareness initiatives on sustainability topics through a comprehensive online learning path on Leonardo.

- **EssilorLuxottica golden rules**

- Uphold the Group's environment and climate-related guidelines and initiatives.
- Show respect for our planet and uphold social responsibility in our daily work. **Engage teams in the climate journey,** through initiatives aiming to raise awareness and share practices around climate change and environmental sustainability.
- Obtain, maintain and keep current all required environmental permits and registrations and follow the requirements of such permits, and expect the same from our Business Partners.
- Only authorized employees may share information related to the Group's sustainability program "Eyes on the Planet" in a public setting. Adopt a humble and factual tone of voice when communicating about EssilorLuxottica's sustainability strategy and efforts.

Refer to the Group Sustainability Communication Policy.

5.4 Being Transparent in Lobbying and Advocacy

- **Key principles**

Lobbying activity is increasingly regulated, and several countries have adopted specific regulations or rules about lobbying and "representation of interests".

Lobbyists are often subject to **transparency obligations** such as **registration** on a national registry, **public declaration** of the persons they have contacted, or list of their customers.

Lobbyists may be a Group employee or a third party (such as consultant, official lobbyist, law firm, think tank, NGO) exercising duties in the Group's name.

There is no unique definition of lobbying, but it often refers to communications with authorities **aiming at influencing a government decision-making**, for example to influence the adoption of a law. There is sometimes a thin line between lobbying and simple advocacy (e.g., promoting visual health would generally be considered as advocacy, but trying to influence regulations promoting visual health may be

- **EssilorLuxottica golden rules**

- The engagement and activity of the lobbyist **must comply with applicable laws**, especially in countries where they are regulated (such as USA, France, United Kingdom, Australia).

- Lobbyists should clearly **inform** persons and third parties they meet that they are acting in EssilorLuxottica or its subsidiaries' name and make sure they avoid any confusion with other activities that could be exercised in a private or professional capacity or in the context of any mandate (whether in associations, a political or trade union mandate).

Refer to our Group Anti-bribery and corruption Policy (internal Code of conduct).

5.5 Supporting our Mission

- **Key principles**

EssilorLuxottica's Mission is to help people around the world "see more and be more". The Mission drives the Group's strategy. It inspires the Group's integrated approach to sustainable development and its ambition to help eliminate uncorrected poor vision by 2050, providing employees with a unique sense of purpose.

Employees are expected to become strong advocates of our Mission and encouraged to get involved and volunteer in the several initiatives organized by the Group's Mission team to support communities, from addressing vision care needs to climate-related and social impact initiatives. It is generally a great personal experience and an opportunity to help others, as well as discover how sight has the power to change lives.

- **EssilorLuxottica golden rules**

- Leaders and managers should inspire employees to take pride in the Group's Mission and become advocates of our actions towards helping to eliminate uncorrected poor vision by 2050.
- Managers should encourage employees to engage in the Group's Mission initiatives.
- Employees must never be forced to donate to our philanthropic activities.

6. REPORTING VIOLATIONS

6 Reporting violations

- **What to do when witnessing a potential or actual violation of our Code of Ethics**

EssilorLuxottica encourages a **culture of openness** in which all concerns about ethics can be discussed openly. As such, it is important to report potential or actual violations of this Code of Ethics in order to protect our employees as well as the Group's integrity and reputation.

We strive to create a **safe environment** where employees and other stakeholders should feel safe to raise genuine concerns in good faith **without fear of reprisals**, even if they turn out to be mistaken.

- **How we ensure safe reporting**

EssilorLuxottica is committed to ensuring the following principles for any individual reporting in good faith a potential or actual violation:

- **Confidential reporting.** Confidentiality of reporters / whistleblowers' identity and reports is of particular importance, and our internal procedure includes all appropriate steps to protect it.
- **Anonymous reporting.** We protect their anonymity, if requested, in compliance with applicable laws.
- **No retaliation.** We prohibit retaliation against reporters / whistleblowers reporting a violation in good faith.
- **Fair process.** Adequate procedures have been designed and dedicated people have been identified and trained for the purpose of managing and investigating reports and incidents, while aiming at protecting the confidentiality of the reporter / whistleblower at all stages. Reports are assessed and processed based on the prevailing policy of the Group.
- **An impartial investigation** will be conducted by the Group. Conducting factual verifications is part of the process and all staff members are required to cooperate in an investigation.

- **How to report a violation**

We hope that in many cases, as per our open-door principle, employees would be able to raise any concerns directly with their direct or indirect manager or the Human Resources department, and we expect all managers to encourage a safe and trustworthy reporting environment.

However, employees may also use the Internal Reporting system **EssilorLuxottica SpeakUp,** which guarantees impartiality, protection of identity and efficiency.

6 Reporting violations

How to report through our internal reporting system

ESSILORLUXOTTICA SPEAKUP

Employees and external stakeholders can report through different means:

- Through our web hotlines available online in several languages, accessible from a computer or mobile phone, at the following address: https://speakup.essilorluxottica.com/
- Or scan the QR Code below on your mobile phone:
- In certain countries, through the confidential phone lines
- By email: compliance@essilorluxottica.com
- By walk-in to the Compliance department or to a member of the Human Resources department.

For more information, refer to our Group Reporting Policy.

Contact: compliance@essilorluxottica.com

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EssilorLuxottica Code of ethics | 2023

Previous Versions
EssilorLuxottica Code of ethics | 2022
EssilorLuxottica Code of ethics | 2019
Luxottica Group Code of ethics | 2018
Essilor 2018 Code of Ethics | 2018
GrandVision Code of Conduct | 15 July 2018