

SpeakUp Reporting Policy | North America

1. SCOPE:

This Policy covers all North America EssilorLuxottica Entities and applies to all workforce members, including part time, temporary and contract employees.

2. PURPOSE:

As part of our “Eyes on the Planet” program, we at EssilorLuxottica of North America have our Eyes on Ethics. For us, an ethical approach is an absolute priority, and we are committed to comply with applicable laws and regulations as well as internal policies.

Adopting and implementing policies that address regulatory, legal, and internal control requirements is a key element in fostering a culture of compliance. EssilorLuxottica of North America is committed to the highest possible standards of ethical, moral and legal business conduct. This Policy provides a framework for workforce members, and other interested parties, to raise concerns. It also establishes EssilorLuxottica of North America's commitment to non-retaliation; workforce members and other interested parties will be protected from reprisals or victimization when reporting whistleblower complaints in good faith. In addition, this Policy establishes procedures for receiving and handling of the complaints submitted by workforce members and other interested parties.

3. POLICY:

The SpeakUp Reporting Policy is intended to address serious concerns that may have a material impact on the business operations of EssilorLuxottica of North America. Workforce members or other interested parties are encouraged to report a concern if they have knowledge of, or a good-faith reason to suspect wrongdoing related to EssilorLuxottica, regardless of whether it is a breach of internal policies, principles, or non-compliance legal or regulatory obligations. EssilorLuxottica of North America enforce their antiretaliation policy, so anybody can SpeakUp without fear of retaliation.

Reporting certain types of alleged wrongdoing that are in the public interest which may potentially affect others is generally considered whistleblowing. Typically, whistleblowing reports may include, but are not limited to concerns relating to:

- Wrongdoing regarding financial malpractice and misrepresentations
- Impropriety, fraud or criminal activity
- Privacy and data protection breaches
- Accounting and auditing issues or disclosure concerns
- Damage or risk to the environment, health or safety
- Risk to public health
- Harassment and/or discrimination; violence or bullying in the workplace
- Corruption, bribery, kickback, facilitation payments, tax evasion or money laundering
- Anti-competitive conduct
- Violation of healthcare regulations
- Violations of human rights and human trafficking
- Breaches of international economic sanctions or export control regulations
- Deficiencies or noncompliance with EssilorLuxottica internal controls
- Attempts to mislead or improperly influence an independent auditor in the course of their performance of an audit
- Attempts to cover up any of these behaviors

Employment-related concerns are handled separately and should be directed to the workforce member's supervisor or can be reported using the HR Solutions Portal.

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4. SAFEGUARDS:

Protection Against Harassment or Victimization

Harassment or victimization of individuals submitting SpeakUp reports will not be tolerated.

Anonymous Reporting

Reporters may remain anonymous. However, keep in mind that anonymous reports are more difficult to investigate. When submitting a report, Reporters are strongly encouraged to identify themselves and to provide as much detail as possible regarding the complaint / allegation.

Confidentiality and Privacy

The privacy of the individual reporting the issue ("Reporter") will be maintained in accordance with applicable laws and regulations. The identity of the Reporter shall be kept confidential to the extent permitted by law. Throughout the investigation process, investigators are required to take all reasonable steps to reduce the risk that the Reporter will be identified. However, in certain, limited circumstances, the Reporter's identity may need to be disclosed to support further investigation or subsequent legal proceedings prompted as a result of the allegation / complaint.

Information submitted in a report is limited to a few people and departments and it is treated with confidentiality. Data submitted through the SpeakUp portal is maintained in accordance with applicable laws and internal policies. Employee data is collected and used, for several reasons:

- legal and/or regulatory obligations
- employee's employment
- legitimate business interests for compliance with legal obligations (e.g., labor and employment law, data protection law, corporate compliance laws etc.)
- legitimate interest of EssilorLuxottica or other third parties (e.g., suppliers, customers, existing or potential business partners etc.) which can include prevention, review, and/or investigation of misconduct (e.g., kickback, bribery and corruption, fraud, and labor and privacy violations) and the prevention, review and/or investigation of inappropriate behaviors such as harassment, discrimination, retaliation, and bullying.

For additional Privacy information, please refer to the EssilorLuxottica Privacy Policy. For questions about how personal information is processed please direct inquiries to:

Privacy Officer
Luxottica Retail North America, Inc.
4000 Luxottica Place
Mason, Ohio 45040
Phone: 1-800-776-4085
Email: privacyoffice@luxotticaretail.com

No Retaliation

EssilorLuxottica will not tolerate any type of retaliation against any individual for raising a good-faith concern within EssilorLuxottica or to the appropriate authorities under local law, or for participating in the investigation of any complaint. Any workforce member who raises a good faith concern through these methods should do so without fear of dismissal or retaliation of any kind.

Any person who retaliates against a Reporter, threatens or is involved in any such conduct may be subject to disciplinary action, up to and including termination.

Malicious Complaints / Allegations

Malicious complaints / allegations may result in disciplinary action up to and including termination.

5. REPORTING PROCESS

Reporting

The SpeakUp Reporting procedure is intended to be used for serious and sensitive issues or concerns, of possible violation of the law, the EssilorLuxottica Code of Ethics or North America Code of conduct or any other EssilorLuxottica policy. Reporters are encouraged to report concerns, complaints, or allegations in either of the following ways:

- Phone (United States): 0844 303 0229
- Website: <https://speakup.essilorluxottica.com/>

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- E-mail: compliance@essilorluxottica.com

The SpeakUp online platform as well as by phone-based support, are available 24 hours a day, 7 days a week, 365 days a year.

The SpeakUp is a service provided and operated by NAVEX Global, represented by GCS Compliance Services Europe Unlimited Company, registered in the Republic of Ireland with company registration number 448751 . This service allows third parties, present and former employees to report potential violations of EssilorLuxottica Business Code of Conduct, other policies, and/or laws.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor, local HRBP, or via HR Solutions.

Timing and Evidence

The earlier a concern or issue is expressed and reported, the easier it is for EssilorLuxottica to act. Although the Reporter is not expected to prove the truth of an allegation, the information provided in the complaint must demonstrate there are sufficient grounds for investigation. The Reporter should submit all important information such as dates, people involved, complaint description and details, possible witnesses, documents etc.

6. HOW THE REPORT WILL BE HANDLED:

The action taken will depend on the nature of the reported concern.

Initial Review

An initial review will be made to determine whether an investigation is appropriate, and the form it should take. Some concerns may be resolved by agreed upon action without the need for a formal investigation. However, each concern received will be reviewed and actions will be documented.

Feedback to Reporter

Whether a concern is reported through the SpeakUp portal or by using other channels, the Reporter will be given an opportunity to receive follow-ups on their concern: The timeframe for feedback are as follows:

- Acknowledging that the concern was received – in the next 72 hours after complaint was received
- Second message indicating how the matter will be dealt with and if applicable the name of the investigator assigned to the case
- Final message informing that investigation (if applicable) was completed and that the case will be closed. Due to the confidential nature of any investigation, details about the investigation or disciplinary actions (if necessary) will not be disclosed or shared with the Reporter

7. CONTACTS

In case of question on this policy, please contact Compliance@essilorluxottica.com