

# **EssilorLuxottica**

**Policy**  
**Global Diversity, Equity and Inclusion**

## TABLE OF CONTENTS

|  |   |
|--|---|
| 1. Purpose and scope of application .....                          | 3 |
| 2. Definitions, abbreviations and acronyms .....                   | 3 |
| 3. Roles and responsibilities – Stakeholders – HR & Business ..... | 4 |
| 4. References, Regulations .....                                   | 4 |
| 5. Main areas of action .....                                      | 5 |
| 6. Adoption and scope of application .....                         | 8 |
| 7. Policy Violations.....  | 8 |
| 8. Language .....  | 8 |

# EssilorLuxottica

## 1. Purpose and scope of application

### Objective

This policy outlines the principles and commitments of EssilorLuxottica regarding diversity, equity, and inclusion (DE&I). These values are a priority in the Company's change management processes and are fundamental in creating a corporate culture that respects each person's uniqueness and promotes a collaborative, inclusive, and pluralistic work environment, through:

- **Awareness:** raise awareness through educational moments, events, trainings, and dialogue to foster further understanding and knowledge on diversity dimensions and build a more inclusive culture.
- **Process and Policies:** evolve all current HR processes to ensure inclusivity and unbiased decisions while creating new policies to support our DE&I strategy and ensuring sponsorship at all levels of the organization.
- **Goals and data:** develop clear goals leveraging data and metrics, measuring achievements and progress.

Promoting the company core value “We are one, thanks to many” is crucial for EssilorLuxottica to fully unlock everyone’s potential by promoting Diversity, Equity and Inclusion. The Group is dedicated to embracing and celebrating the unique experiences, perspectives, and cultural backgrounds that each employee brings to the workplace. This approach fosters a more inclusive environment where diversity is nurtured, and everyone feels valued, respected, and free to express their authentic selves.

By promoting DE&I, the Group can enhance employees’ sense of belonging and job satisfaction, while also driving higher levels of innovation and performance. This approach not only improves human capital management and resource development but also leads to better overall results, both in terms of organizational cohesion and business success.

### Application

This policy applies immediately to EssilorLuxottica and its directly and/or indirectly controlled companies worldwide always subject to local specific regulations (in line with EssilorLuxottica Code of Ethics).

EssilorLuxottica is also committed to ensuring that its suppliers and partners embrace the principles of this policy (in line with the EssilorLuxottica Business Partners’ Code of Conduct), even in cases where parts of the processes described in this document are not outsourced to them.

## 2. Definitions, abbreviations and acronyms

- HRBP / HRM = Human Resources Business Partner / Human Resources Manager
- DEI / DE&I = Diversity, Equity and Inclusion

# EssilorLuxottica

## 3. Roles and responsibilities – Stakeholders – HR & Business

|  |  |
|--|--|
| <b>Global Diversity &amp; Inclusion Managers part of HR</b>        | Ensure review and execute on the DE&I Group Strategy, ensure the application of the policy. Updates the principles of this policy based on organizational needs  |
| <b>Local Diversity &amp; Inclusion Managers part of HR or HRBP</b> | Ensure the execution of the DE&I Group Policy in its scope of work and review and execute on the local DE&I Strategy, ensure the application of the policy. Updates the principles of this policy based on local organizational needs. Act upon any policy violation in alignment with HRBP and Compliance Managers. |
| <b>People Managers</b>   | Act as role-model to foster Diversity, Equity and ensure Inclusion. Act upon any policy violation in alignment with HRBP and/or Diversity and Inclusion Managers.  |
| <b>Compliance Managers</b>   | Receive the Speak-Up reports, examine them, sort them to the relevant units, supporting the competent functions in understanding the impacts of the violations detected, both from the point of view of the company and the people impacted.   |

These roles collectively work to ensure the most inclusive workforce and employee experience towards better outcome and the achievement of strategic goals of the organization with a continuous improvement approach.

## 4. References, Regulations

This policy reaffirms the Company's commitment to conducting its activities in full respect of legal requirements at international and local level. EssilorLuxottica strives to conduct activities safeguarding human rights and promoting principles, set out by international organizations, as well, including:

- The 2030 Agenda for Sustainable Development and the related Sustainable Development Goals (SDGs);
- The United Nations Universal Declaration of Human Rights;
- The fundamental conventions of the International Labour Organization (ILO);
- The OECD Guidelines. These principles are implemented through organizational frameworks, external engagement initiatives, and specific internal tools.

EssilorLuxottica promotes the principles of the DEI Global Policy in alignment with:

- The Group's Code of Ethics, Business Partners' Code of Conduct and Company Values;

# EssilorLuxottica

- A Global Inclusion Committee within the company, whose primary responsibility is to act as role model for inclusive behavior and meritocracy, safeguarding diversity and equal opportunities in the workplace. By so doing, the Committee shall also review the DE&I strategy and ensure DE&I programs are established and maintained as a foundation within EssilorLuxottica.
- Any other specific local partnership or Local Inclusion Committee (e.g. obtaining and maintaining local DE&I Certifications like Italian Gender Equality Certification UNI PDR 125:2022).

## 5. Main areas of action

EssilorLuxottica actively promotes the principles of inclusion, equity, and the enhancement of diversity, as well as the prevention of any form of discrimination within the company community. To this end, a series of corporate mechanisms are adopted, all based on respecting individuals' rights and freedoms. This approach is guided by a principle of continuous improvement aimed at positioning EssilorLuxottica among the best practices when it comes to DE&I.

### People Processes

To create a work environment that guarantees equal opportunities, it is essential to review key processes impacting human resources, as they are crucial for fostering employee well-being, engagement, personal and professional development, and productivity growth. Specifically, these processes involve:

#### 1. Employer Branding, Talent attraction, Acquisition and Onboarding

Our commitment to DE&I is integral to our employer branding, talent attraction, acquisition, and onboarding processes. We strive to create a welcoming and inclusive environment that reflects the diverse communities we serve. By actively promoting DE&I, we aim to attract a wide range of talented individuals from various backgrounds, ensuring that our recruitment practices are fair and unbiased. We are committed to a non-discriminatory approach, providing equal opportunities to all individuals since their first days in EssilorLuxottica.

#### 2. Performance Management, Development, Succession Planning and Career Mobility

Throughout the employment relationship, EssilorLuxottica is committed to creating and maintaining the necessary conditions for everyone's skills and knowledge to expand, based on merit recognition and equal opportunities. The Global Performance Management process is designed to ensure equitable and fair evaluation of performance and growth trajectory of each eligible employee. Specific programs for professional development aimed at acquiring new skills are designed to nurture the talented EssilorLuxottica employees and prepare them to succeed to higher organizational positions with an equitable approach.

As part of this, EssilorLuxottica encourages its employees to acquire new competencies and is committed to developing their managerial and leadership abilities, paying close attention to enhancing their professionalism and creating conditions for their personal growth and potential, without discrimination based on any diversity attribute. Personnel management follows principles of fairness and impartiality, avoiding any form of discrimination, and respecting the professionalism and skills of employees.

# EssilorLuxottica

## 3. **Salary Review and Equity**

EssilorLuxottica's salary review policy aims to realize principles of merit recognition and clarity toward employees, including through regular monitoring of potential pay gaps. The company also commits to ensuring transparency in the application of compensation policies, including benefits and bonuses. EssilorLuxottica ensures that all employees have an adequate standard of living with suitable working hours. EssilorLuxottica ensures that compensation and benefits provided to employees are in compliance with local or national laws when they exist or with applicable collective agreements. In all cases, EssilorLuxottica seeks, as a minimum, to provide commensurate compensation for each employee. Finally, the Company implements wellbeing programs aimed at all categories of workers, addressing diverse needs and interests across different stages of personal and professional life.

## 4. **Engagement and wellbeing**

EssilorLuxottica promotes the work-life balance of its people in all stages of their personal and professional lives by adopting, as reasonably practicable flexible work measures (smart working, where available based on local regulation and nature of duties, and part-time according to local regulation and business needs). Additionally, the company supports its employees during extended absences from work, preventing any form of discrimination upon their return and facilitating full reintegration in accordance with applicable laws.

## 5. **Prevention of all forms of abuse (Physical, Verbal, Digital)**

EssilorLuxottica is committed to ensuring an inclusive and respectful work environment where every person is treated with dignity and respect, and equal opportunities are guaranteed. EssilorLuxottica prohibits 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.). The company strives to identify the risk of all forms of abuse — physical, verbal, or digital — and prepares plans for preventing and managing workplace harassment.

## 6. **Support to Parenthood and Caregiving**

EssilorLuxottica promotes the sharing of family responsibilities through initiatives supporting parenthood, including:

- programs that grant paid parental leave
- programs designed to assist employees with caregiving needs for elderly parents, partners, or children. With regard to parental leave, EssilorLuxottica is committed to maintaining assigned benefits during the leave period and promoting the reintegration of employees into their roles, facilitating flexible work hours when needed, and protecting pay equity.

# EssilorLuxottica

## Drivers of Diversity, Equity, and Inclusion

Given the international context in which EssilorLuxottica operates, the Group assesses the relevance of multiple diversity aspects. Below are the main ones:

- **Gender Equality**

The company is dedicated to fostering a balanced and inclusive workplace where all genders are represented and valued. We actively promote equal opportunities for all employees, regardless of gender, and work to eliminate any form of gender-based discrimination while promoting a respectful work environment. Our initiatives include fair hiring practices, equitable pay, and career advancement opportunities, along with support for work-life balance and parental leave. By cultivating an environment of mutual respect and understanding, we aim to empower all employees to reach their full potential and contribute to our collective success. Additionally, the company is committed to combating gender-based violence and harassment through tools, channels, and prevention plans designed to receive, analyze, and address reports of alleged violations of the Code of Ethics and related rules.

- **Gender Identity and Sexual Orientation**

The company is dedicated to creating a supportive and welcoming environment for all employees, recognizing and respecting every sexual orientation, gender identity, and expression. We actively promote equal opportunities and work to eliminate any form of discrimination or bias against LGBTQIA+ individuals. Through awareness initiatives, we foster understanding and respect for LGBTQIA+ issues. By cultivating an environment of acceptance, understanding, and allyship, we aim to empower all employees to be their authentic selves and contribute to our collective success. Additionally, the company is committed to removing any barriers related to an individual's gender identity, expression, or emotional/sexual orientation.

- **Parenthood and Caregiving**

The company is dedicated to supporting caregiving and parenthood, promoting a model of shared family responsibility and advancing women's equality while recognizing all types of families. We provide paid parental leave to all parents and, where locally regulated, extend support to LGBTQIA+ families to ensure they receive the same benefits and flexibility as traditional families. Additionally, we offer programs to assist employees with specific caregiving needs for elderly parents, partners, or children. Regarding parental leave, we are committed, where possible, to maintaining assigned benefits during the leave period, facilitating the reintegration of employees into their roles, offering flexible work hours when needed, and protecting pay equity.

- **Age and Generations**

EssilorLuxottica values integrated strategies for developing and managing the needs of different generations within the organization, as it believes that generational diversity can be a growth tool, particularly through the transfer of knowledge and diverse social, cultural, and professional experiences among workers.

- **Disability**

The company actively implements concrete measures to promote the inclusion and development of people with disabilities, as well as creating fully accessible work environments by removing

# EssilorLuxottica

architectural and technological barriers to facilitate access to physical locations, information tools, and professional activities.

- **Ethnicity, Religion and Culture**

EssilorLuxottica promotes respect and inclusion for all ethnicities, cultures, and religions. The company celebrates the rich diversity within our workforce and recognizes the unique contributions each individual brings. The company actively promotes a culture of respect and understanding of cultural, and religious differences.

EssilorLuxottica provides managers and employees with appropriate training and awareness on Diversity, Equity and Inclusion, including about how to recognize and prevent discrimination, harassment, retaliation and unconscious bias.

## **6. Adoption and scope of application**

The policy is mandatory for all Group Entities and employees.

## **7. Policy Violations**

All employees of EssilorLuxottica are expected to adhere to the provisions outlined in this Policy.

The monitoring of policy implementation is carried out through the "Speak Up" tool, accessible via the company website, for reporting any behavior that does not comply with national and international regulations or EssilorLuxottica's commitments outlined in this policy or in all related organizational documentation. These reports will be received, analyzed, and resolved within the timeframes provided for in the process, as outlined in the relevant documentation. In addition to "Speak Up" tool, policy violations can be addressed to HRBP or direct manager who are responsible in properly act upon them.

Any violation of the policy is subject to disciplinary evaluation and may be sanctioned in accordance with the provisions of the laws and collective agreements applied.

## **8. 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 will prevail.