2024 Sustainability Report

Extract from the 2024
Universal Registration Document

EssilorLuxottica

Sustainability Report

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1 General Disclosures

Sustainability at EssilorLuxottica

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

From fighting climate change, managing and reducing water use at manufacturing sites, improving occupational Health & Safety, and ensuring equal opportunities to engaging local communities in outreach initiatives, its Eyes on the Planet program consistently supports its Mission.

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

Eyes on the Planet program
with 5 strategic pillars

External recognition
AAA ESG rated from MSCI, constituent of the Dow Jones Best-in-Class Europe Index
Included in FT Diversity Leaders list
A- score in CDP Climate Change and B score in CDP Water Security

SBTi validation
of near-term emission reduction targets

58% of renewable energy in the Group's energy mix

Alternative materials
43% of collections launched in 2024 having alternative materials

63% valorised waste in 2024

86.8 million
People in underserved communities equipped with eyeglasses

979 million
People with permanent access to vision care since 2013

>5,500 employees volunteering
vs. 3,800 in 2023

> 9 million
Leonardo education hours since 2021

>83,500
Employee Shareholders

> 195,000 employees
60% Female and 35% female senior executives

First gender parity certificate obtained in Italy

Launch of Inclusion Committee

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

(1) *SDG 3 'Good health and well-being', SDG 4 'Quality education', SDG 5 'Gender equality', SDG 6 'Clean water and sanitation', SDG 7 'Affordable and clean energy', SDG 8 'Decent work and economic growth', SDG 9 'Industry, innovation and infrastructure', SDG 10 'Reduced inequalities', SDG 11 'Sustainable cities and communities', SDG 12 'Responsible consumption and production', SDG 13 'Climate action', SDG 16 'Peace, justice and strong institutions' and SDG 17 'Partnerships for the goals'.*

(2) *UN General Assembly resolution 'Vision for Everyone: accelerating action to achieve the Sustainable Development Goals' available at un.org.*

Eyes on the Planet, EssilorLuxottica's Sustainability Program

Sustainability is deeply rooted at the core of EssilorLuxottica, both as an essential part of the Company's DNA and key to continuing its history of corporate responsibility to help people 'see more and be more'. First presented in 2021, Eyes on the Planet is based on five key pillars described below: Eyes on Carbon, Eyes on Circularity, Eyes on World Sight, Eyes on Inclusion and Eyes on Ethics. Each pillar has a clear commitment and is broken down into a set of core activities that are easy to recognize in the Company's business model, offering presence and connection with local communities and territories.

- Eyes on Carbon: EssilorLuxottica is committed to addressing climate change and preserving the environment by improving energy efficiency across facilities, increasing the self-production and use of renewable energy, and supporting the protection and restoration of natural ecosystems. Key milestones include reducing and neutralizing the carbon footprint of its direct operations (Scopes 1 and 2) globally by 2025 (already achieved in Europe in 2023). In addition, in 2024, Group's emissions reduction targets were validated by the Science-Based Targets initiative (SBTi), marking a key milestone in the Company's efforts to reduce the environmental impact across its entire value chain.
- Eyes on Circularity: at EssilorLuxottica, sustainability goes hand-in-hand with products and services, right from the development phase. The Company's efforts focus on optimizing the use of resources while ensuring high product standards, with the objective to shift from fossil-based materials to bio-based and/or recycled materials and embed eco-design in all its innovation developments by end of 2025. Additional efforts include increasing internal recycling capabilities and implementing circular services to extend product life or give products a second life.
- Eyes on World Sight: Based on its belief that good vision is a basic human right, the Group has an ambition to eliminate uncorrected poor vision in a generation and make vision care accessible to everyone, everywhere. This responsibility is embedded in corporate citizenship initiatives, such as advocacy for vision care in underserved communities through the OneSight EssilorLuxottica Foundation. Recognized for its global impact, EssilorLuxottica earned a spot in Fortune magazine's 'Change the World' list for the fourth time. In addition, the Company continues its efforts to make art accessible for all through the 'Eyes on Art' initiative.
- Eyes on Inclusion: The Company seeks to develop a culture of learning, diversity and safety along with a working environment that offers everybody the same opportunities on the basis of merit and without discrimination. 2024 marked significant progress in the Company's Diversity, Equity and Inclusion (DE&I) efforts and in the deployment of its culture of health, safety and well-being in the workplace. Key milestones included: the publication of the Global EHS Policy as part of the Company's commitment to safeguarding the environment, Health & Safety of its employees, business partners, customers and local communities; the introduction of the Global DE&I Policy to embed inclusive principles; the launch of the Inclusion Committee to monitor equality on a global scale and the rollout of 'Your Voice', a worldwide platform amplifying employee feedback.
- Eyes on Ethics: EssilorLuxottica's vertically-integrated business model is the key to delivering and ensuring a fair and ethical business approach wherever it has a presence. The Company's Code of Ethics and Business Partners' Code of Conduct establish harmonized practices and protect human and labor rights across its entire value chain, as per the International Bill of Human Rights and ILO Conventions. In 2024, the Group reinforced its ethical business approach with the launch of a new Anti-Money Laundering Policy, among others, and dedicated training programs for its Code of Ethics and anti-corruption.

Ever since its launch, the Company and its subsidiaries have been consistently executing projects and initiatives under each Eyes on strategic pillar of the program, aiming to further embed sustainability into its business model. By advancing its Eyes on the Planet program, EssilorLuxottica contributes to its Mission and involves the entire organization in addressing environmental protection, employee well-being and the economic and social progress of the local communities it serves.

1.1 Basis for Preparation

1.1.1 General Basis for Preparation of Sustainability Statements

EssilorLuxottica's sustainability report has been prepared as part of the first application of the legal and regulatory requirements following the transposition of the European directive on the publication of corporate sustainability information (Corporate Sustainability Reporting Directive – 'CSRD Directive') and in accordance with the ESRS issued and adopted by the European Union from January 1, 2024 to December 31, 2024. This consolidated sustainability report has been prepared under the responsibility of the Board of Directors. It was approved and authorized for issue on February 12, 2025.

The Group discloses, within this sustainability report as of December 31, 2024, the material disclosure requirements provided by the ESRS and expected by its stakeholders.

Boundaries of the sustainability report

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

As an exception to the above principle, Heidelberg Engineering and Supreme are excluded from the company 2024 sustainability reporting (as well as from the double materiality analysis) as their acquisitions was finalized at the end of 2024 and left no sufficient time for the company to analyse impacts, risks and opportunities and prepare related relevant and reliable sustainability information.

The value chain items addressed in this sustainability report include both upstream and downstream actors and their activities in relation to the Group's vertically integrated business model, from the design and manufacturing to the distribution of ophthalmic lenses, frames and sunglasses and their use by consumers. However, it should be noted that the preparation of sustainability information has been made complex by the absence of comparative data and reliable benchmarks, particularly at sectoral level, as well as by difficulties in collecting market data, especially within the value chain. Therefore, the value chain information is determined to the best of current knowledge.

Uncertainties related to first implementation of ESRS standards

This first year of implementation of the CSRD Directive is characterized by many uncertainties. In addition to those uncertainties inherent to the state of scientific or economic knowledge and the quality of the external data used, several interpretations of the texts remain, for which further clarifications from standard-setting or regulatory bodies are expected, particularly regarding the sectoral application standards of the ESRS or the application of the technical criteria of the Taxonomy Regulation.

Thus, the preparation of the sustainability report is based on the knowledge, data, normative interpretations and information available at its preparation date. A better understanding of the requirements may be available when additional implementation guidance or Q&A are available. EssilorLuxottica, like the other Companies on the market subject to this regulation, may improve its understanding of the requirements of the ESRS standards when additional recommendations, interpretations and/or market positions become available regarding their implementation. The Group may then, if necessary, evolve certain reporting and communication practices, in a continuous improvement approach to take into consideration best practices and market recommendations. The double materiality assessment process will also be refined over time.

Judgement and use of estimates

As explained in the Methodology Note (please refer to Section 5 *Methodology Note* for more details) and under quantitative data tables, the preparation of the sustainability report requires management's use of judgement, extrapolations and estimates based on the current state of scientific knowledge. Estimates may also be refined in future reporting periods when more relevant information becomes available. Key interpretation, uncertainties, main judgements and assumptions are clarified, when necessary, in the related note taking into consideration the methodological limitations related to the preparation of certain environmental indicators, including Scope 3 emissions.

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

EssilorLuxottica considers that Operating Expenses related to OneSight EssilorLuxottica Foundation, overall total weight of products and of secondary reused or recycled components are critical or confidential for the Group and as such, are not disclosed in this sustainability report.

Reporting process

Although EssilorLuxottica has implemented a risk management process over sustainability reporting (refer to Section 1.2.5 *Risk Management and Internal Controls Over Sustainability Reporting*), internal processes related to sustainability reporting will be strengthened over time. The Group will then continue to further improve the reliability of certain indicators over the next years and implement new processes to gather information that is not currently available. As of December 31, 2024, and for the reasons mentioned above, some metrics are not or are partially disclosed, notably metrics related to:

- not consolidated at Group level:
  - Pollution (ESRS E2): substances of concern/high concern, microplastics and air/water emission,
  - Water and marine resources (ESRS E3): water reused and recycled,
  - Resource use and circular economy (ESRS E5): rates of recyclable content in products packaging,
  - Own Workforce (ESRS S1): operating expenses (current financial resources allocated to action plans),
  - Business Conduct (ESRS G1): payment practices and percentage of functions-at-risk covered by anti-bribery and corruption training programmes.

  These information are monitored and tracked locally where appropriate. Metrics are not consolidated at central level, mainly due to the difference of regulations that can exist between regions or countries. In this context, an over-reliance on estimating the values might lead to unreliable and questionable figures. Therefore, the Group will be checking the relevance and materiality of these KPIs and, should it be the case, the appropriate processes to track, report, control and consolidate the information will be implemented.
  - In addition, the ratio of total annual remuneration of the highest paid individual to the median total annual remuneration of all employees (excluding the highest paid individual) has been calculated in accordance with the AFEP/MEDEF regulations on a French perimeter (see Section 4.3.3 *AFEP-MEDEF Compensation and Benefits Tables*).

Besides:

- Capital Expenditure (CapEx) and Operating Expenses (OpEx) related to:
  - Pollution (ESRS E2),
  - Water and marine resources (ESRS E3),
  - Resource use and circular economy (ESRS E5),
  - Workers in the value chain (ESRS S2),
  - Consumers and end-users (ESR S4),
  - Business Conduct (ESRS G1);
- CapEx related to Own Workforce (ESRS S1) and Affected Communities (ESRS S3);
- OpEx related to Climate Change (ESRS E1)

are not disclosed in this document as the amounts are not significant relative to the Group perspective.

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

1.1.2 Disclosures in Relation to Specific Circumstances

As explained in the Methodology Note (Section 5 for more details) and under quantitative ESG data tables, extrapolations and estimates are used for the reporting of some data points when necessary. Main judgements and assumptions are then clarified. Should changes in the preparation and presentation of sustainability information or modifications of data occur compared to the previous reporting period, this is clarified under the associated tables.

The Universal Registration Document (URD) provides a comprehensive view of EssilorLuxottica's strategy, businesses, governance, and financial statements, as well as its sustainable development strategy and performance. The Group business model and strategy are presented in Chapter 1 of the 2024 Universal Registration Document. The approach as a whole and all aspects generally relating to risks are presented in Chapter 2. The entire Chapter 4 is dedicated to Corporate Governance.

The Vigilance Plan pursuant to Article L.225-102-4 of the French Commercial Code is included in Chapter 2 of the 2024 Universal Registration Document. The Plan contains the rules applied to prevent the risk of serious adverse impacts on Human Rights and Fundamental Freedoms, the Health & Safety of people and the environment resulting from the activities of EssilorLuxottica, its subsidiaries, and suppliers.

1.2 Governance

1.2.1 The Role of the Administrative, Management and Supervisory Bodies

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

As explained in Chapter 4 of the 2024 Universal Registration Document, the Directors come from different backgrounds and they complement one another due to their different professional experience, their skills and their international exposure. The Company abides by the principle of a diverse and balanced gender representation on the Board, which includes:

- seven independent Directors within the meaning of the AFEP-MEDEF Code (58% of Directors);
- two executive directors (14% of Directors);
- two directors representing employees;
- six women, that is, approximately 43% of the EssilorLuxottica Board of Directors; and one Board Committee out of three is chaired by a woman;
- five nationalities (French, German, Indian, Italian and Monegasque).

Directors' expertise and skills on sustainability topics are described in Section 4.1.1.2 of the 2024 Universal Registration Document.

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

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

To strengthen knowledge on sustainability reporting requirements and on the concrete application of the Double Materiality Assessment within the Company's sustainability strategy, directors are periodically involved in specific Board induction sessions on sustainability topics held by the management of the relevant functions and third-party experts. For other information on the composition, expertise and skills of Directors, please refer to Chapter 4 of the 2024 Universal Registration Document.

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

- Corporate Social Responsibility (CSR) Committee: its main duty is to ensure that the Group effectively addresses the deployment of its Mission, which is fully integrated in its strategy. The CSR Committee also addresses the deployment of the Group's Eyes on the Planet sustainability program. As detailed in Chapter 4 of the 2024 Universal Registration Document, CSR Committee duties go beyond philanthropy, sustainable programs, and compliance to address how the Company manages its economic, social and environmental impacts as well as its relationships with stakeholders;
- Audit and Risk Committee: its main duties include ensuring the integrity of the financial statements and reviewing the risk assessment and risk management processes, including ESG risks, information security and cybersecurity risks. In this respect, the CSR Committee coordinates its work with the Audit and Risk Committee in carrying out its oversight of corporate processes aimed at identifying and managing sustainability issues and the corresponding impacts, risks and opportunities (IROs). To this regard, following two joint-meetings with the CSR Committee also attended by the Chief Corporate Sustainability Officer of the Group in 2024, the two committees updated the Board of Directors on the Double Materiality Assessment, through which the identification of sustainability priority topics and the analysis of the associated impacts on the environment and people, including impacts on Human Rights, and ESG risks have been carried out;
- Nomination and Compensation Committee: its main duties include the assessment of company and executive performance, including the definition of the sustainability criterion for the long-term incentive scheme in connection with the Eyes on the Planet program and the assessment of its achievement rate.

To learn more about the Committees of the Board of Directors, refer to Chapter 4 of the 2024 Universal Registration Document.

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

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

Nine sustainability professionals reporting to the Chief Corporate Sustainability Officer assist different functions, business units, brands and subsidiaries with the implementation of the Eyes on the Planet program and activate the necessary synergies. In addition, most functions and business units have a sustainability contact person, while the Operations function has a specific Sustainability team dedicated to Product and Operations Sustainability. As a result, EssilorLuxottica has a network of over 120 people working on sustainability projects and initiatives and this number is expected to increase as the Corporate Sustainability function expands the implementation of the Eyes on the Planet program to new departments, business units and subsidiaries consistent with the sustainability strategic priorities emerged in the Double Materiality Assessment that was conducted in 2024.

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

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

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

The balance of power within the Company's bodies is ensured by the composition of the Board of Directors and its committees, which comprise a high proportion of independent Directors and members having a wide diversity of profiles and skills, as shown in Section 4.1.1.2 *Expertise and Skills of Directors* of the 2024 Universal Registration Document.

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

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

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

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

In 2024, EssilorLuxottica conducted its first Double Materiality Assessment, which is reassessed on a timely basis and will be updated over the upcoming years.

The analysis was finalized with two workshops held with the Group's Top Management, to review and discuss the materiality assessment process and confirm or review the materiality of any sustainability Impact, Risk and Opportunity (IRO).

In addition, through the preparation of periodic presentations, the Chief Corporate Sustainability Officer provided information on the outcome of the Double Materiality Assessment as well as on the progress of the 2024 sustainability reporting campaign to the CSR and Audit & Risk Committees. The Board of Directors acknowledged those meetings and validated the results of the Double Materiality Assessment in terms of material topics, material IROs and representation within this Chapter.

In consideration of the evolution in sustainability reporting requirements, joint meetings with both CSR and Audit & Risk committees are set on a regular basis to discuss progress on sustainability reporting, the deployment of the Company's Eyes on the Planet sustainability program, and the management of associated material impacts, risks, and opportunities. By so doing, each Director in the two committees and the Board at large have a clear understanding of EssilorLuxottica's environmental, social and ethical priorities and can address them strategically, as well as when reviewing major transactions or M&A deals. For very specific sustainability compliance aspects, training sessions with external experts are also evaluated and performed upon advice of the Chief Corporate Sustainability Officer and the General Counsel.

1.2.3 Integration of Sustainability-Related Performance in Incentive Schemes

The remuneration policy for corporate officers is defined by the Board of Directors based on recommendations from the Nomination and Compensation Committee and embeds sustainability considerations aligned with the Group's strategic priorities in this area, as presented in Chapter 4 of the 2024 Universal Registration Document.

In 2024, on the recommendations of the Nomination and Compensation Committee, the Board of Directors revised the criteria for the long-term incentive plan. Besides share price performance, the plan is now subject to a financial objective and a corporate social responsibility (CSR) commitment. The performance conditions governing the long-term incentive scheme include a specific performance indicator reflecting the Group's long-term commitment to climate change in accordance with its Eyes on the Planet sustainability program. The introduction of a CSR criterion is indeed intended to reinforce commitment to sustainability over the long term.

According to the 2024-2027 long-term incentive plan presented in Chapter 4 of the 2024 Universal Registration Document, the CSR criterion represents 20% of the vesting criteria. The chosen criterion is represented by the total level of carbon emissions in 2026 considering EssilorLuxottica's environmental sustainability roadmap.

The assessment scale for this criterion has been defined by the Board of Directors, in line with the science-based carbon reduction targets validated by the Science-Based Targets initiative, and is reported in Chapter 4 of the 2024 Universal Registration Document. The targeted emissions include all the Group's Scope 1 (direct) and Scope 2 (purchased energy) emissions and the Scope 3 (indirect) emissions deriving from i) Purchased goods and services (not including Equipment, Instruments and Wearables sub-categories), ii) fuel- and energy-related activities, iii) upstream transportation and iv) waste generated in Operations.

1.2.4 Statement on Due Diligence

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy, and business model	2.3 *EssilorLuxottica Vigilance Plan* (see page 94 of the 2024 Universal Registration Document)
b) Engaging with affected stakeholders in all key steps of the due diligence	
c) Identifying and assessing adverse impacts	
d) Taking actions to address those adverse impacts	
e) Tracking the effectiveness of these efforts and communicating	

1.2.5 Risk Management and Internal Controls Over Sustainability Reporting

As part of its commitment to mitigate environmental, social and governance risks, the Group has integrated the analysis of risks related to sustainability topics into the annual risk assessment process conducted by the Risk Management function. The description of the main risks identified that may affect the Group, which include Reporting & Communication risk, is presented in Chapter 2 of the 2024 Universal Registration Document. This assessment needs to be read in conjunction with the main characteristics of the risk management and internal control systems implemented by the Company as described in Chapter 2 of the 2024 Universal Registration Document.

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

1.3 Strategy

1.3.1 Strategy, Business Model and Value Chain

EssilorLuxottica is a global leader in the design, manufacture and distribution of ophthalmic lenses, frames, sunglasses and medical technologies. With over 200,000 people in the workforce across 150 countries, more than 600 operations facilities and approximately 17,600 stores, in 2024, the Company generated consolidated revenue of €26.5 billion. Its mission is to help people around the world to 'see more and be more' by addressing their evolving vision needs and personal style aspirations.

The Company operates a vertically integrated business model directly covering every single step of the value creation process, from product design and development to distribution, starting with a powerful R&D platform committed to making EssilorLuxottica a laboratory for med-tech, design and innovation.

In this respect, sustainability is a key driver of the Group's innovation and growth story. With eco-design being a cornerstone of the Group's innovation strategy, EssilorLuxottica places sustainability at the heart of product development. And a strong focus is put on reducing its product environmental footprint with thorough consideration of environmental impact along every step of the product development process and life cycle.

The Company operates an open, collaborative business model, that creates value for all stakeholders, including customers, consumers, employees, shareholders, business partners and suppliers as well as the communities where the Company operates. By partnering with key industry players, the Group develops groundbreaking eyecare and eyewear solutions that meet the world's growing vision care demands and changing consumer lifestyles while inventing new ways to reach the billions of people who suffer from uncorrected vision.

As detailed in Chapter 1 of the 2024 Universal Registration Document, EssilorLuxottica's global footprint is well balanced and diversified and it guarantees the highest levels of service.

Manufacturing is backed by a wide-reaching Professional Solutions network that serves wholesale customers with a unique combination of high-quality vision care products, iconic brands, and cutting-edge digital services and solutions.

Professional Solutions are complemented by an extensive global Direct to Consumer network that offers the Group a unique understanding of consumer trends, both globally and locally, by cultivating relationships with millions of consumers every day, offering them high-quality vision care products, expert advice and iconic brands. These distribution channels are complemented by branded e-commerce platforms as well as pure digital players.

Resources

People
- Over 205,000 people in the workforce
- Under 35 forming almost 50% employees, women equal to 60% employees
- Unique corporate culture

Global footprint
- 47 mass production facilities between lenses (33) and frames (14)
- 562 Prescription laboratories and edging-mounting facilities
- 118 distribution centers

Unique innovation capabilities
- 50 design and R&D facilities making the Company a laboratory for med-tech, design and innovation
- ISCC Plus certification for circular economy obtained for plants with nylon scraps recycling process
- Implementing circular services to extend product life or give products a second life

Responsible use of resources
- Set GHG emissions reduction targets aligned with science and validated by SBTi
- Expanding the on-site production and use of renewable energy
- Limiting single-use plastics in distribution and manufacturing sites and in packaging
- Increasing the use of bio-materials and of recycled materials for frames, plano and demo lenses

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

Financial strength
- Stable shareholding structure
- Net sales reaching €26.5 billion in 2024
- Free cash flow is €2.4 billion

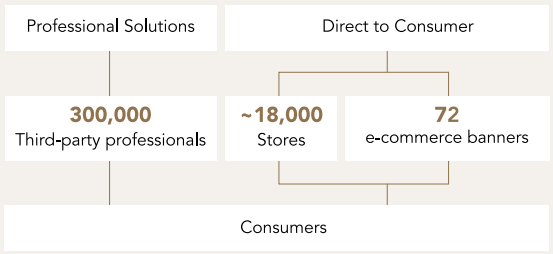
Raw materials production and processing

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

Product development

Operations

Supply chain



Value creation

People
- Global 'Your Voice' survey: 130,000 employees engaged
- Over 83,500 employee shareholders
- Inclusion Committee to champion diversity, equity, and inclusion within the Group

Global footprint
- Job creation in over 150 countries
- Leonardo learning ecosystem accessible to all players in the industry
- 400 WELL certified stores by 2027

Unique innovation capabilities
- Pipeline of transformational initiatives across materials, processes, products and services
- Partnerships with renowned universities e.g., Smart Eyewear Lab in Politecnico di Milano, ESSEC Circularity Chair
- Investing in innovative technologies to manage theend-of-life of its products

Responsible use of resources
- Assessing eyewear and lenses innovation projects with internal eco-design tool (SAM)
- Investing in low carbon supply chain initiatives
- Conducting responsible sourcing audits at supplier sites

Societal contribution
- Provided permanent vision care access for almost 979 million people
- Increasing employee volunteering opportunities
- Supporting cultural institutions and museums through broadcasting and tactile interpretations of artworks

Financial community
- Included in the Dow Jones Best-in-Class Europe Index and in FTSE4Good Index
- External recognition of its ESG performance, e.g., AAA rated by MSCI ESG, included in S&P Global Sustainability Yearbook 2025

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

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

Nevertheless, understanding value-chain vulnerabilities and opportunities allows EssilorLuxottica to implement clear pathways to decarbonization and further integrate sustainability into its business and value creation model. Opportunities for value creation also emerged within the Double Materiality Assessment the Company performed during the year. In this respect, the incorporation of the double materiality principles in the way EssilorLuxottica engages with its stakeholders strengthened the alignment between financial and sustainability considerations. The assessment confirmed the Company's strategic approach to sustainability pursued through the Eyes on the Planet program. By addressing each material topic and associated impacts, risks and opportunities in a structured manner, EssilorLuxottica is able to align materiality insights with actions for each pillar of its sustainability program, as exemplified below.

Eyes on the Planet pillars and initiatives

Carbon	Circularity	Ethics	Inclusion	World Sight
• On-site production and use of renewable energy • Operations efficiency • Low-carbon supply chain initiatives • Stakeholders' engagement on the decarbonization journey	• Roll-out of closed circuit water recycling systems in lens laboratories • Introduction of bio-based and recycled materials • Reducing single use plastic from packaging • Expanding circular services	• Global deployment of Code of Ethics and Business Partners' Code of Conduct • Roll-out of the internal reporting system SpeakUp • Launch of Human Rights global task force • Group Responsible Sourcing program	• Release of the Group DEI and EHS policies • Started the Equitable Compensation Framework project • Launch of Your Voice listening campaign • Set the Inclusion Committee	• Global collaborating partner of WHO and of UN Refugee Agency • Expanding awareness campaigns: World Sight Day and World Children's Day • Enhancing cultural accessibility through Eyes on ART
Climate change **Pollution**	**Water** **Resource use and circular economy**	**Workers in the value chain** **Business conduct**	**Own workforce**	**Affected communities** **Consumers and end users**

Material sustainability topics

1.3.2 Interests and Views of Stakeholders

EssilorLuxottica's approach to sustainable development relies heavily on the environmental and social impact of its business activities related to various stakeholders along its value chain.

The Company interacts with a wide range of stakeholders, including employees, suppliers, business partners, eyecare professionals, customers, authorities, and NGOs. As a global company, it engages stakeholders at global, regional, and local levels to learn about their perceptions and expectations while ensuring a unified and consistent presence across markets. The EssilorLuxottica Code of Ethics and Business Partners' Code of Conduct sets forth principles that apply to all its employees, contractors, vendors and suppliers everywhere and in every circumstance. In addition, the Corporate Sustainability Communications Policy provides guiding principles for governing and coordinating the Company's external and internal communication flows regarding sustainability.

The Group aims to maintain a regular and proactive dialogue with all its stakeholders so that it can continuously respond to their needs and expectations. Stakeholders' interests and views have been taken into account to build and launch EssilorLuxottica's Eyes on the Planet program, including its approach, policies and targets.

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

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

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

Key stakeholders

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

Stakeholder group	Interests and views	2024 highlights
Employees, representative organizations and trade unions	• Quality of working conditions • Work-life balance • Talent recruitment, attraction and retention • Development and training • Equal opportunities, diversity and inclusion	• In 2024, 78% of the employees invited took part in the 'Your Voice' engagement survey • Launch of EssilorLuxottica European Work Council • Establishment of the Inclusion Committee, with executive management sponsors
Workers in the value chain	• Quality of working conditions • Work-life balance • Talent recruitment, attraction and retention • Development and training • Equal opportunities, diversity and inclusion	• EssilorLuxottica Responsible Sourcing and Manufacturing audits • SpeakUp
Business partners (including licensors) and suppliers	• Responsible sourcing • Collaboration on innovation and development • Integrity and compliance with regulations and laws, including Human Rights	• Self-assessment questionnaires and 106 on-site audits in 2024 • Expanded access to Leonardo, EssilorLuxottica's digital learning platform • Access to SpeakUp (whistleblowing system)

Stakeholder group	Interests and views	2024 highlights
Clients (e.g., ECPS) and consumers	• High-quality and innovative products • High-quality customer service and training • Responsible marketing • Integrity in business relations • Sustainable offering • Meeting health needs related to societal trends (e.g., digitalization and aging population) • Data protection	• Exploring sustainable packaging solutions, and sustainability certifications, e.g., Global Recycled Standard Certification (GRS) at Fedon and Cradle to Cradle Certification for DbyD brand • Extended product offerings with bio and recycled acetate for frames and bio-nylon for lenses • Awareness campaigns for parents on children's visual health
Shareholders, investors and rating agencies	• Management of sustainable development and ESG risks • Transparency and evaluation of sustainability disclosure • Progress in sustainability strategy and Eyes on the Planet program, including ESG KPIs, commitments and updates	• Annual General Meeting: presentation of EssilorLuxottica's Eyes on the Planet progress, including climate change • Investors' meetings • Regular contact with ESG rating agencies, including MSCI, Moody's, S&P Global and Sustainalytics
Public Authorities and Governments, NGOs and Consumer Associations	• Social and economic impact • Transparency (on social initiatives, environmental footprint, product performance, etc.) • Sponsorships and philanthropy • Contribution to visual health and inclusive economy • Fair business practices, including responsible marketing • Dialogue, partnership and education	• Partner of Fair Wage Network • Member of Better Cotton through Oakley • Partner of WHO through the OneSight EssilorLuxottica Foundation • Public presentation of a five-year clinical follow-up study of Essilor Stellest lenses in slowing down myopia progression in children • Participation in public consultations and think tanks on sustainability
Educational institutions	• Cooperation for R&D and innovation (e.g., scholarships and partnerships) • Talent attraction, recruitment and development	• Financing EssilorLuxottica Smart Eyewear Lab in Milan, a research platform between EssilorLuxottica and Politecnico di Milano, employing >100 researchers • Supporting academic chairs such as the Circular Economy Chair with ESSEC and OD/PhD Program of the American Academy of Optometry Foundation (AAOF)
Local communities	• Employment creation and support to inclusive businesses and local economies • Raising awareness and providing access to vision correction and protection • Sponsorships and philanthropy	• OneSight EssilorLuxottica Foundation and its initiatives aimed at eliminating uncorrected poor vision in a generation • In 2024, over 5,500 employees volunteered for the OneSight EssilorLuxottica Foundation • 'Eyes on Art', enhancing cultural accessibility in 2024 through new partnerships in Italy, France, and the UK • Over 54,000 meals have been delivered since the start of the meal delivery project in Italy, with an average of 200 meals per day

1.4 Impact, Risk and Opportunity Management

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

1.4.1.1 Introduction

The ESRS (European Sustainability Reporting Standards) require all companies within the scope of the Corporate Sustainability Reporting Directive (CSRD) to report on sustainability matters based on a Double Materiality Assessment (DMA). which expands the concept of materiality from a focus on financial materiality to one that includes a view of a company's impact on stakeholders and society. The assessment covers the following dimensions:

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

Under this double materiality concept, a sustainability topic meets the double materiality criteria if it is material from the impact perspective or from the financial perspective or from both perspectives. EssilorLuxottica has implemented a process aimed at assessing double materiality to enable the company to identify how its business operations impact the environment and the broader society including the affected stakeholders, throughout the value chain, while considering how external factors impact the undertaking's development, performance, and financial position. The identification and disclosure of material positive and negative impacts, and financial risks and opportunities (IROs) in connection with each sustainability topic is the starting point for sustainable reporting under ESRS.

EssilorLuxottica conducted its double materiality assessment between March and November 2024, with a final validation from the Group's top management and approval from the Board of Directors after the formal review of the Audit and Risk Committee. This assessment was jointly conducted by the Corporate Sustainability, Finance and Risk Management Departments involving different Group functions and will be reassessed on a timely basis, when necessary, as provided by the ESRS. It is also important to consider that the ESRS do not mandate how the materiality assessment process shall be designed or conducted. In addition, no harmonized practice is available. Therefore, judgment is required to design a process that follows the standards and reflects the company's specific facts and circumstances. Consequently, the Group followed the four-step approach suggested in 'EFRAG IG 1: Materiality Assessment Implementation Guidance' to identify its material sustainability topics:

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

1.4.1.2 Context analysis and identification of potential ESG topics

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

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

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

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

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

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

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

1.4.1.3 Identification of potential material impacts, risks and opportunities

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

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

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

1.4.1.4 Assessment and identification of material impacts, risks and opportunities

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

Internal stakeholders were asked to evaluate:

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

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

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

Both internal and external stakeholders scored the IROs through detailed evaluation scales comprehensively explained via an online survey and had the opportunity to comment on the matters via open text fields. For the potential impacts, the additional parameter of likelihood was scored. More specifically, the evaluation scales were developed on a range [1 to 5], in alignment with the existing ERM scale in place, already adopted in previous years' risk assessments. Additionally, key internal stakeholders participated in in-depth interviews to further explore the rationale behind the relevance of sustainability matters, based on their area of expertise. The online survey was sent to 115 internal stakeholders and 128 external stakeholders, with a total of 134 responses received: 89 from internal stakeholders and 45 from external stakeholders (i.e., response rates of 78% and 35% respectively).

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

Internal interviews and workshops included 18 one-to-one interviews and 5 workshops, each focusing on different topics, based on the specific expertise and background of the single interviewee. Altogether, they covered all sustainability IROs. The interviews and workshops were conducted according to an established and standardized approach. Each interviewee, depending on the specific area of expertise, was asked to give an explanation on the evaluations provided through the survey, to better understand the rationale, potential changes to their evaluation, and insights on the trend of the specific IROs along the short and long term (increase, stable or decrease) and where these IROs might materialize along the value chain (upstream, downstream, and own operations).

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

In terms of results consolidation, and to derive a prioritization of the ESG final matters, the underlying methodology entailed the selection of the highest impact (severity and likelihood) and financial scores (magnitude and likelihood) received by its related IROs, and then converted again on a scale of 1 to 5. In case of a potential negative Human Rights impact, severity has been given precedence over likelihood through the application of a multiplier.

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

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

1.4.1.5 Validation of final list of material IROs

The consolidation of EssilorLuxottica's double materiality assessment has been performed with two final workshops held with the Group's Top Management, to review and discuss the materiality assessment process and confirm or review the materiality of any sustainability IROs. In particular, the outcomes of interviews and workshops, alongside the quantitative result of the survey, were used as the basis for the consolidation of the materiality assessment.

The aim of the workshops was to inform on the process, engage in a discussion on the DMA results, incorporate the different feedback and prepare the organization on the next sustainability reporting steps. In some cases, EssilorLuxottica's Top Management highlighted the need to consider material an impact, risk or opportunity that had not previously materialized as such following the survey evaluation. The Top Management reevaluation has been taken carefully into consideration, based on the solid argumentation provided to support and justify the identified materiality changes. Then, the Double Materiality Analysis was presented to both the Audit and Risk Committee and CSR Committee.

Finally, the Corporate Sustainability department has refined the formulation of IROs to align with the input from the 2024 Group's risk assessment and reflect its constant interaction with other functions, latest clarifications from the regulator and market practices. The final list of 41 material IROs consists of 5 positive impacts, 15 negative impacts, 15 risks and 6 opportunities.

1.4.1.6 Double materiality assessment outcome

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

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

Material ESG topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon
E2 Pollution						
Pollution Prevention	Risk of infringements of pollution-related regulations and of cost due to remediation actions	Failing to reduce the environmental impacts of air or water pollution from the manufacturing sites and lens laboratories could lead to non-compliance with pollution prevention regulations, resulting in penalties, fines, increased operational costs and legal liabilities. Additionally, regulatory violations could damage the company's reputation, leading to loss of consumer trust, investor confidence, and market competitiveness.	Risk	Own opera-tions	Potential	Medium
Product Safety	Potential impact on human health and the environment	Potential exposure to substances of concern and microplastics could threaten health, causing allergic reactions, toxicity, or long-term health issues. Additionally, the release of microplastics and harmful chemicals into the environment during production process, use, or disposal of products can lead water contamination and contribute to broader environmental degradation.	Negative impact	Value chain	Potential	Long
E3 Water and Marine Resources						
Water Manage-ment	Risk of inefficient water management practices	Excessive water use and withdrawals, uncontrolled discharges or leaks of waste-water can disrupt supply chains, particularly for water-dependent processes leading to higher operational costs, production delays, potential water pollution and regulatory fines.	Risk	Own opera-tions	Potential	Medium
	Use of water resources that might impact local communities and the environment	Negative environmental damage (e.g., depletion of natural water resources resulting in the decay of related ecosystem services) due to inadequate water management, particularly in water-stressed areas, that can impact local communities.	Negative impact	Own opera-tions	Actual	Short

Material ESG topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon
E5 Circular Economy						
Circular Sources, Product and Services	Use of raw material and natural resources	Excessive extraction and inefficient use of key resources (such as fossil based materials, metal) can lead to the depletion of finite natural reserves, contributing to environmental degradation.	Negative impact	Value chain	Actual	Short
	Developing alternative materials (to the benefit of the entire industry)	Embracing advanced technologies (e.g., alternative materials, reuse, increasing renewable and recycled content) to reduce reliance on traditional, finite resources can support the Company's positioning as a leader in sustainable innovation. This shift allows the company to explore and adopt new, eco-friendly materials that minimize environmental impact, increase production efficiencies and savings, and align with evolving consumer demand for more sustainable products, ultimately affecting the broader industry, as these innovations can set new standards for sustainability and resource efficiency.	Opportunity	Own operations	Actual	Short
	Risk of limited access to certain raw materials (scarcity, stringent regulations)	Growing global demand for key resources has heightened scarcity, driving up costs and complicating procurement processes. Additionally, evolving environmental regulations aimed at protecting natural ecosystems impose stricter requirements, limiting access to raw materials and increasing compliance costs. These challenges can lead to production delays, rising operational expenses, and diminished competitiveness.	Risk	Value chain	Potential	Long
	Risk of not answering product and services sustainability expectations	Failure to meet sustainability expectations, that entails reducing resource outflows by designing products for longevity, recyclability, and reusability can lead to increased reputational damage, as consumers increasingly prefer environmentally responsible products, leading to loss of market share and reduced revenue.	Risk	Own operations	Potential	Medium
Waste Manage-ment	Risk of lack of compliance with waste regulation	Improper management of waste poses risks for organizations, including increased costs and reputational damage. Non-compliance with environmental regulations can lead to fines and penalties.	Risk	Own operations	Potential	Medium
	Waste Generation	Damages related to environmental degradation (environmental pollution and reduction of ecosystem services) due to improper waste management (e.g., dispersal or abandonment of waste).	Negative impact	Value chain	Actual	Short

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

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

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

Material ESG topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon
S3 Affected Communities						
Creating Awareness for Vision Care for All	Creating access to eyeware and eyecare solutions for disadvantaged communities[(a)]	Creating access to eyewear and eyecare solutions for disadvantaged communities by tackling uncorrected poor vision in underserved populations, offers a dual advantage: improving quality of life (enhanced education, socio-economic development, and public health) and offer market opportunities (new segments and new products, etc.).	Opportunity	Downstream	Actual	Short
Affected Communities' Right and Engagement	Impact on local communities' development thanks to eyewear and eyecare programs[(a)]	Eyecare and eyewear programs enhance the overall quality of life, particularly in underserved and vulnerable populations. Good vision directly contributes to better educational outcomes for students and increased productivity for workers, fostering economic growth at the local level. Additionally, these initiatives often create job opportunities within the communities, both in the delivery of eyecare services and the distribution of eyewear products.	Positive impact	Downstream	Actual	Short
Impactful Programs that give Vision Care Access to All	Volunteering activities and social initiatives[(a)]	Engagement activities and employee volunteering activities through One Sight Foundation, contribute to the improvement of economic and social conditions of underserved communities at a local level, as well as enhance employees' sense of contribution and engagement through their involvement in volunteering activities	Positive impact	Own operations	Actual	Short
S4 Consumers and End-users						
Data Privacy	Consumers' personal data breaches	Data breaches resulting from inefficient data privacy measures expose consumers and stakeholders' personal data to unauthorized third-parties causing for the affected persons anxiety, stress and distrust for the company due to the loss of control on their personal data.	Negative impact	Downstream	Actual	Short
	Infringements of data privacy-related regulations	Infringements of data privacy-related regulations pose reputation and legal risks for organizations and individuals. Non-compliance with laws such as the General Data Protection Regulation (GDPR) or similar data privacy frameworks can result in severe financial penalties, legal liabilities, and potential litigations. Beyond financial repercussions, violations of data privacy can erode trust with consumers, damaging a company's reputation and leading to a loss of consumer loyalty.	Risk	Downstream	Actual	Short

(a) Entity-specific.

Material ESG topic	IRO name	IRO description	Type of IRO	Value chain	Potential /actual	Time horizon
Product Innovation	Innovating to respond to current and new consumers' demand	By developing new products and enhancing existing ones to align with consumers' preferences-whether through sustainability, functionality, or design-businesses can strengthen consumer's loyalty, attract new market segments, and differentiate themselves in a competitive landscape. As new and improved products are introduced, demand increases, leading to higher sales volumes and new growth opportunities for partners.	Opportunity	Downstream	Actual	Short
Creating Awareness for Vision Care for All	Granting of eyewear and eyecare access	Granting access to eyewear and eyecare promotes social inclusion by enabling individuals to fully participate in education, work, and daily life. Improved vision boosts learning outcomes, enhances job productivity, and fosters independence, reducing inequalities linked to uncorrected poor vision.	Positive impact	Downstream	Actual	Short
Product Safety	Potential Health & Safety issues for the consumers due to the use of the products	Product defects, inadequate safety standards, and harmful materials can affect consumers, leading to injuries and health issues. This exposure can lead to health concerns, including eye strain and skin damage. Furthermore, harmful materials can trigger allergic reactions, compromising comfort and well-being	Negative impact	Downstream	Potential	Medium
	Risk of litigations and reputational damages due to product quality and safety issues	Incidents related to product quality and safety assurance may lead to claims for compensation from consumers, and fines from authorities, as well as negatively impact brands reputation, resulting in financial losses	Risk	Downstream	Potential	Long
Relationship with Consumers	Enhanced consumer's loyalty	Consumer's access to quality information disclosed by the Group may enhance their trust and loyalty, positively impacting brand perception, and leading to higher financial returns	Opportunity	Downstream	Actual	Short
Transparent Communication and Reporting	Risk of non-compliance with upcoming greenwashing regulations	As governments and authorities are narrowing the attention on greenwashing and non-compliance with emerging sustainability and transparency regulations could have negative repercussions on the business, in terms of legal fines and negative financial returns, due to reduction of consumer trust and Company's lower credibility	Risk	Downstream	Potential	Medium

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

1.4.1.7 Additional information on EssilorLuxottica's double materiality approach

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

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

Table 2

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

Table 3

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

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

Appendix B

Disclosure requirement and related datapoint	Section and page number	Materiality
ESRS 2 GOV-1 Board's gender diversity, paragraph 21 (d)	1.2.1 *The Role of the Administrative, Management and Supervisory Bodies* p. 5	
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)	1.2.1 *The Role of the Administrative, Management and Supervisory Bodies* p. 5	
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	1.2.4 *Statement on Due Diligence* p. 8	
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40 (d) i	Not relevant for the Group	
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40 (d) ii	Not relevant for the Group	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) iii	Not relevant for the Group	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40 (d) iv	Not relevant for the Group	
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14	2.1.3 *Transition Plan for Climate Change Mitigation* p. 36	
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks, paragraph 16 (g)	Not relevant for the Group	
ESRS E1-4 GHG emission reduction targets, paragraph 34	2.1.6 *Targets* p. 41	
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	2.1.7 *Energy Consumption and Mix* p. 43	
ESRS E1-5 Energy consumption and mix, paragraph 37	2.1.7 *Energy Consumption and Mix* p. 43	
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	2.1.7 *Energy Consumption and Mix* p. 44	
ESRS E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions, paragraph 44	2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)* p. 44	
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)* p. 46	
ESRS E1-7 GHG removals and carbon credits, paragraph 56	2.1.9 *GHG Removals and GHG Mitigation Projects Financed Through Carbon Credits* p. 46	

Disclosure requirement and related datapoint	Section and page number	Materiality
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66	Phased-in	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a)	Phased-in	
ESRS E1-9 Location of significant assets at material physical risk, paragraph 66 (c).	Phased-in	
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c).	Phased-in	
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities, paragraph 69	Phased-in	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	1.1.1 *General Basis for Preparation of Sustainability Statements* p. 4	
ESRS E3-1 Water and marine resources, paragraph 9	2.3.3 *Policies* p. 51	
ESRS E3-1 Dedicated policy, paragraph 13	Not relevant for the Group	
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Not relevant for the Group	
ESRS E3-4 Total water recycled and reused, paragraph 28 (c)	1.1.1 *General Basis for Preparation of Sustainability Statements* p. 4	
ESRS E3-4 Total water consumption in m^3 per net revenue on own operations, paragraph 29	2.3.5 *Targets and Metrics* p. 53	
ESRS 2- SBM 3 – E4, paragraph 16 (a) i	-	Not material
ESRS 2- SBM 3 – E4, paragraph 16 (b)	-	Not material
ESRS 2- SBM 3 – E4, paragraph 16 (c)	-	Not material
ESRS E4-2 Sustainable land/agriculture practices or policies, paragraph 24 (b)	-	Not material
ESRS E4-2 Sustainable oceans/seas practices or policies, paragraph 24 (c)	-	Not material
ESRS E4-2 Policies to address deforestation, paragraph 24 (d)	-	Not material
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	2.4.6 *Targets and Metrics* p. 61	
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	2.4.6 *Targets and Metrics* p. 61	

Disclosure requirement and related datapoint	Section and page number	Materiality
ESRS 2- SBM3 – S1 Risk of incidents of forced labour, paragraph 14 (f)	3.1.6.3 *Policies* p. 105	
ESRS 2- SBM3 – S1 Risk of incidents of child labour, paragraph 14 (g)	3.1.6.3 *Policies* p. 105	
ESRS S1-1 Human rights policy commitments, paragraph 20	3.1.6.3 *Policies* p. 105	
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21	3.1.6.3 *Policies* p. 105	
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	3.1.6.3 *Policies* p. 105	
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	3.1.3.5 *Preventing and managing Health & Safety risks to people* p. 86	
ESRS S1-3 Grievance/complaint handling mechanisms, paragraph 32 (c)	3.1.6.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns* p. 106	
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88 (b) and (c)	3.1.3.7 *Targets and metrics* p. 89	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88 (e)	3.1.3.7 *Targets and metrics* p. 89	
ESRS S1-16 Unadjusted gender pay gap, paragraph 97 (a)	3.1.2.6 *Actions and resources p. 82*	
ESRS S1-16 Excessive CEO pay ratio, paragraph 97 (b)	4.3.3 *AFEP-MEDEF Compensation and Benefits Tables* (see page 185 of the 2024 Universal Registration Document).	
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	3.1.6.7 *Metrics and targets* p. 109	
ESRS S1-17 Non-respect of UNGPs on business and Human Rights and OECD Guidelines, paragraph 104 (a)	3.1.6.7 *Metrics and targets* p. 109	
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain, paragraph 11 (b)	3.2.2 *Material Impacts, Risks and Opportunities* p. 110	
ESRS S2-1 Human rights policy commitments, paragraph 17	3.2.3 *Policies and Engagement* p. 111	

Disclosure requirement and related datapoint	Section and page number	Materiality
ESRS S2-1 Policies related to value chain workers paragraph 18	3.2.3 *Policies and Engagement* p. 111	
ESRS S2-1 Non-respect of UNGPs on business and Human Rights principles and OECD guidelines, paragraph 19	3.2.3 *Policies and Engagement* p. 113	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19	3.2.3 *Policies and Engagement* p. 111	
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	3.2.4 *Actions and Resources* p. 114	
ESRS S3-1 Human rights policy commitments, paragraph 16		Not material
ESRS S3-1 Non-respect of UNGPs on business and Human Rights, ILO principles or OECD guidelines, paragraph 17		Not material
ESRS S3-4 Human rights issues and incidents, paragraph 36		Not material
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	3.4.2.3 *Policies* p. 121; 3.4.3.3 *Policies* p. 126; 3.4.4.3 *Policies* p. 131	
ESRS S4-1 Non-respect of UNGPs on business and Human Rights and OECD guidelines, paragraph 17	3.4.2.3 *Policies* p. 121; 3.4.3.3 *Policies* p. 126	
ESRS S4-4 Human Rights issues and incidents, paragraph 35	To the best knowledge of EssilorLuxottica, there were no issues and incidents regarding Human Rights and consumers/end-users	
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Not applicable as the Group has an Anti-bribery and corruption policy	
ESRS G1-1 Protection of whistle- blowers, paragraph 10 (d)	Not applicable as EssilorLuxottica is subject to legal requirements with regard to protection of whistleblowers, in accordance with the applicable laws transposing Directive EU 2019/1937 and other applicable laws.	
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	To the best knowledge of EssilorLuxottica, there were no convictions or fines for violation of anti-corruption and anti-bribery laws in 2024, as stated in Section 4.1.6 *Targets and metrics* p. 141	
ESRS G1-4 Standards of anti- corruption and anti- bribery, paragraph 24 (b)	4.1.5 *Actions, Resources and Procedures* p. 138	

ESRS	Topic	Data requirement	Section and page number
ESRS 2	General requirements	BP-1	1.1.1 *General Basis for Preparation of Sustainability Statements* p. 3
		BP-2	1.1.2 *Disclosures in Relation to Specific Circumstances* p. 5
		GOV-1	1.2.1 *The Role of the Administrative, Management and Supervisory Bodies* p. 5
		GOV-2	1.2.2 *Information Provided to and Sustainability Matters Addressed by EssilorLuxottica's Administrative, Management and Supervisory Bodies* p. 7
		GOV-3	1.2.3 *Integration of Sustainability-Related Performance in Incentive Schemes* p. 7
		GOV-4	1.2.4 *Statement on Due Diligence* p. 8
		GOV-5	1.2.5 *Risk Management and Internal Controls Over Sustainability Reporting* p. 8
		SBM-1	1.3.1 *Strategy, Business Model and Value Chain* p. 8
		SBM-2	1.3.2 *Interests and Views of Stakeholders* p. 11
		SBM-3	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		IRO-1	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		IRO-2	1.4.2 *Disclosure Requirements in ESRS Covered by EssilorLuxottica's Sustainability Statement* p. 26
ESRS E1	Climate change	GOV-3	1.2.3 *Integration of Sustainability-Related Performance in Incentive Schemes* p. 7
		SBM-3	2.1.2 *Material Impacts, Risks and Opportunities* p. 34
		IRO-1	2.1.2 *Material Impacts, Risks and Opportunities* p. 34
		E1-1	2.1.3 *Transition Plan for Climate Change Mitigation* p. 36
		E1-2	2.1.4 *Policies* p. 37
		E1-3	2.1.5 *Actions and Resources* p. 38
		E1-4	2.1.6 *Targets* p. 41
		E1-5	2.1.7 *Energy Consumption and Mix* p. 43
		E1-6	2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)* p. 44
		E1-7	2.1.9 *GHG Removals and GHG Mitigation Projects Financed Through Carbon Credits* p. 46
		E1-8	2.1.10 *Internal Carbon Pricing* p. 46
		E1-9	Phase-in

ESRS	Topic	Data requirement	Section and page number
ESRS E2	Pollution	IRO-1	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		E2-1	2.2.3 *Policies* p. 48
		E2-2	2.2.4 *Actions and Resources* p. 49
		E2-3	2.2.5 *Targets and Metrics* p. 50
		E2-4	1.1.1 *General Basis for Preparation of Sustainability Statements* p. 4
		E2-5	1.1.1 *General Basis for Preparation of Sustainability Statements* p. 4
		E2-6	Phase-in
ESRS E3	Water and marine resources	IRO-1	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		E3-1	2.3.3 *Policies* p. 51
		E3-2	2.3.4 *Actions and Resources* p. 52
		E3-3	2.3.5 *Targets and Metrics* p. 53
		E3-4	2.3.5 *Targets and Metrics* p. 53
		E3-5	Phase-in
ESRS E4	Biodiversity and ecosystems	Not material	-
ESRS E5	Circular economy	IRO-1	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		E5-1	2.4.3 *Policies* p. 55
		E5-2	2.4.5 *Actions and Resources* p. 57
		E5-3	2.4.6 *Targets and Metrics* p. 61
		E5-4	2.4.4 *Key Products and Materials* p. 56
		E5-5	2.4.5 *Actions and Resources* p. 57
		E5-6	Phase-in

ESRS	Topic	Data requirement	Section and page number
ESRS S1	Own workforce	SBM-2	1.3.2 *Interests and Views of Stakeholders* p. 11
		SBM-3	3.2.2 *Material Impacts, Risks and Opportunities* p. 75
		S1-1	3.1.2.3 *Policies* p. 78; 3.1.3.3 *Policies* p. 85; 3.1.4.3 *Policies* p. 90; 3.1.4.11 *Policies* p. 94; 3.1.5.3 *Policies and processes* p. 99; 3.1.6.3 *Policies* p. 105
		S1-2	3.1.2.4 *Processes for engaging with own workers and workers' representatives* p. 79; 3.1.3.4 *Engaging with own workers on Health & Safety* p. 86; 3.1.4.4 *Processes for engaging with own workers and workers' representatives* p. 90; 3.1.4.12 *Processes for engaging with own workers and workers' representatives* p. 95; 3.1.5.3 *Policies and processes* p. 99; 3.1.6.4 *Processes for engaging with own workers and workers' representatives* p. 106
		S1-3	3.1.2.5 *Processes to remediate negative impacts and channels for own workers to raise concerns* p. 80; 3.1.3.5 *Preventing and managing Health & Safety risks to people* p. 86; 3.1.4.5 *Processes to remediate negative impacts and channels for own workers to raise concerns* p. 91; 3.1.6.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns* p. 106
		S1-4	3.1.2.6 *Actions and resources* p. 80; 3.1.3.6 *Actions and resources* p. 87; 3.1.4.6 *Actions and resources* p. 91 3.1.4.13 *Actions and resources* p. 95; 3.1.5.4 Actions and resources p. 101; 3.1.6.6 *Actions and resources* p. 108
		S1-5	3.1.2.7 *Targets and metrics* p. 83; 3.1.3.7 *Targets and metrics* p. 88; 3.1.4.7 *Targets and metrics* p. 91; 3.1.4.14 *Targets and metrics* p. 98; 3.1.5.5 *Targets and metrics* p. 103; 3.1.6.7 *Metrics and targets* p. 109
		S1-6	3.1.1 *Introduction* p. 72
		S1-7	3.1.1 *Introduction* p. 72
		S1-8	3.1.4.7 *Targets and metrics* p. 92
		S1-9	3.1.5.5 *Targets and metrics* p. 103
		S1-10	3.1.2.6 *Actions and resources* p. 81
		S1-11	Phase-in
		S1-12	Phase-in
		S1-13	Phase-in
		S1-14	3.1.3.7 *Targets and metrics* p. 88
		S1-15	Phase-in
		S1-16	3.1.2.6 *Actions and resources* p. 82
		S1-17	3.1.3.7 *Targets and metrics* p. 88; 3.1.6.7 *Metrics and targets* p. 109
ESRS S2	Workers in the value chain	SBM-2	1.3.2 *Interests and Views of Stakeholders* p. 11
		SBM-3	3.2.2 *Material Impacts, Risks and Opportunities* p. 110
		S2-1	3.2.3 *Policies and Engagement* p. 111
		S2-2	3.2.3 *Policies and Engagement* p. 113
		S2-3	3.2.3 *Policies and Engagement* p. 113
		S2-4	3.2.4 *Actions and Resources* p. 114
		S2-5	3.2.5 *Targets* p. 115
ESRS S3	Affected communities	SBM-2	1.3.2 *Interests and Views of Stakeholders* p. 11
		SBM-3	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		S3-1	3.3.4 *Strategy and Policies* p. 117
		S3-2	3.3.4 *Strategy and Policies* p. 117
		S3-3	3.3.4 *Strategy and Policies* p. 117
		S3-4	3.3.5 *Actions and Resources* p. 118
		S3-5	3.3.6 *Targets and Metrics* p. 120

ESRS	Topic	Data requirement	Section and page number
ESRS S4	Consumers and end-users	SBM-2	1.3.2 *Interests and Views of Stakeholders* p. 11
		SBM-3	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		S4-1	3.4.2.3 *Policies* p. 121; 3.4.3.3 *Policies* p. 126; 3.4.4.3 *Policies* p. 131
		S4-2	3.4.2.4 *Processes for engaging with consumers* p. 121; 3.4.3.4 *Processes for engaging with consumers* p. 126; 3.4.4.3 *Policies* p. 131
		S4-3	3.4.2.5 *Processes to remediate negative impacts and channels for consumers to raise concerns* p. 121; 3.4.3.5 *Processes to remediate negative impacts and channels for consumers to raise concerns* p. 128; 3.4.4.3 *Policies* p. 131
		S4-4	3.4.2.6 *Actions and resources* p. 122; 3.4.3.6 *Actions and resources* p. 129; 3.4.4.4 *Actions and resources* p. 132
		S4-5	3.4.2.7 *Targets* p. 124; 3.4.3.7 *Targets* p. 130; 3.4.4.5 *Targets* p. 132
ESRS G1	Business conduct	GOV-1	1.2.1 *The Role of the Administrative, Management and Supervisory Bodies* p. 5
		IRO-1	1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* p. 13
		G1-1	4.1.3 *Policies* p. 134
		G1-2	4.1.5.5 *Management of relationships with suppliers* p. 141
		G1-3	4.1.5.3 *Prevention and detection of bribery and corruption* p. 140 and 4.1.5.4 *Training on business conduct and anti-corruption* p. 140
		G1-4	4.1.6 *Targets and Metrics* p. 141
		G1-5	Not material
		G1-6	4.1.5.5 *Management of relationships with suppliers* p. 141

2 Environmental Information

2.1 ESRS E1 – Climate Change

2.1.1 Introduction

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

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

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

2.1.2 Material Impacts, Risks and Opportunities

Material ESG Topic	IRO name	IRO description	Policy	Target/Metric
Climate Resilience	Adverse social impacts due to the disruption in operations caused by extreme climate events	Extreme climate events such as hurricanes, floods or droughts can ultimately lead to significant social impacts including job losses and reduced working hours, economic strain on affected communities, social unrest or dissatisfaction due to prolonged services outages or production delays.	• EHS Policy • Climate Transition Plan • Business Partners' Code of Conduct	• 42% absolute reduction of Scopes 1&2 GHG emissions by 2030 from a 2022 base year • 25% absolute reduction of selected Scope 3 GHG emissions categories by 2030, from a 2022 base year
	Disruption of activities due to extreme climate events (e.g., hurricane, floods, etc.)	Increase in extreme weather events (e.g., cyclones, droughts, floods, etc.) due to climate change impact business continuity in terms of operational disruptions, supply chain interruptions and store closures causing capacity to be downgraded and operations to be temporarily stopped or shut down completely.		
Climate Transition	Risks associated with transitioning to a lower-carbon economy (policy, legal, technology, and market changes)	Transitioning to a lower-carbon economy could imply the issuance of country-specific carbon regulatory policies or carbon taxes or stricter environmental regulations. Compliance with these regulations would involve the adoption of new, low-carbon technologies, which may require significant investment, pose operational challenges and increase production costs (e.g., raw materials, energy and transportation). At the same time, consumers' demand for responsible products and services may lead to adjustments in product design and manufacturing and retail services.		
	Energy consumption and GHG emissions	The threats of high energy consumption and GHG emissions to climate change may translate into more extreme weather events, rising sea levels, and disruptions to ecosystems, thereby impacting biodiversity and natural resources, and the broader environment and society.		

Following both the CSRD requirements and the recommendations of the TCFD framework (Task Force on Climate Related Financial Disclosures), two categories of climate-related risks – risks related to the physical impacts of climate change and risks related to the transition to a lower-carbon economy – are considered to prepare the Company for potential operational, financial and reputational effects, and to build the climate resilience of its activities.

Identification and management of physical climate risks

Since 2021, EssilorLuxottica has been performing physical climate risk assessments to gain a better understanding of the Group's climate-related risks. The Group updated and expanded the scope of its physical climate risk assessment in late 2022, covering the Group's full activities, including manufacturing and logistics facilities, offices and directly managed stores. In total, 616 Group's assets, based on their insured value, (including 84 stores representative of the footprint) have been analysed. A climate risk platform provided by an external company has been used leveraging on the GPS points or addresses of these assets. This climate risk model was built based on four chronic climate hazards (heat stress, sea level rise, precipitation and drought) and three acute climate hazards (tropical cyclones, extreme flooding and fire weather) over the mid-term (2030) and long-term (2050 and 2100). The other climate –related risks were not considered relevant due to the Group's activities and locations. The model takes into consideration three 'Representative Concentration Pathways' (RCP) scenarios developed by the Intergovernmental Panel on Climate Change (IPCC), an internationally recognized body of the United Nations.

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

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

According to this model, the main gross climate-related risks for the Group would be precipitation, heat stress and extreme flooding in countries such as China, Thailand, United Sates, and the Philippines. Finally, the model can support management decisions when evaluating a new building project or when acquiring a new company.

In addition, the resilience against major threats is verified and strengthened following a site visit by the Property and Asset insurer, as part of the loss prevention and business continuity approach of the Group to ensure business continuity. For example, for flooding risk, mitigation measures usually involve the implementation of a flood emergency response plan that may also include the installation of barriers to avoid penetration of the water inside the buildings.

Besides, all the processes implemented as part of the ISO 14001 and/or ISO 50001 and/or ISO 45001 are also used as mitigation measures and for the safety of employees (see Sections 2.1.5 *Actions and Resources* and 3.1.3.6 *Actions and resources*).

Finally, the geographical footprint of EssilorLuxottica's manufacturing and logistics facilities, distribution networks and human capital is well balanced and diversified across more than 150 countries where the Company operates and represents a real shield against unexpected events, including extreme climate ones.

Regarding the value chain, a specific in-depth analysis will be devoted to the topic in due course.

Identification and management of transition climate risks

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

In addition to the double materiality analysis, a dedicated first analysis has been performed in 2024 on transition risks, using the Net Zero emissions by 2050 scenario (consistent with limiting the global temperature rise to 1.5 °C) to stress-test business resilience and the Network for Greening the Financial System (NGFS) data for 2027 (short term) and 2030 (medium term) climate scenarios. The scenario requires that all stakeholders, governments, businesses, investors and citizens take action and it details the key milestones to transform the world to an economy powered predominantly by renewable energy sources rather than fossil fuels. Some of the assumptions in the IEA NZE scenario[1] are reported below:

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

[1] *Assumptions from International Energy Agency, NetZero by 2050 scenario.*

The main gross risks identified are:

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

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

As described in the following sections, the Group has massively invested in renewable energy deployment (see Section 2.1.5 *Actions and Resources*), and new facilities are built following high energy performance standards and low fossil fuel dependence. And, the SBTi trajectory will make it possible to significantly decrease the impact of its own operations, while engaging its key suppliers in this journey.

The deployment of the Company's climate initiatives is reflected in the Group's operating expenses and investments accounted for during the course of the year as well as in the medium-term projections used to perform 2024 annual impairment tests (see Note 10.1 *Impairment Tests* in Chapter 5 of the 2024 Universal Registration Document) and in the 2025 budget preparation. No other climate-related material impacts were reflected in the 2024 financial statements.

2.1.3 Transition Plan for Climate Change Mitigation

As a key milestone in its long-term goal to address climate change, in 2024, EssilorLuxottica has set its first science-based emission reduction targets covering its entire value chain, defined following the 2022 Carbon Footprint Assessment of the Group, and that are in line with the Paris Agreement goals.

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

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

The target set on Scopes 1 and 2 covers 100% of the GHG emissions and the one set on Scope 3 covers more than 70% of the total Scope 3 GHG emissions on the 2022 baseline. 2022 represents the base year as it is the first year of fully available consolidated data after the combination of Essilor and Luxottica and the acquisition of GrandVision and as such, 2022 is representative in terms of the activities covered.

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

In order to reach the above-mentioned targets, carbon reduction priorities have been identified:

- **product evolution:**
  - **increasing the use of renewable energy –** As part of the Group's efforts to minimize its own emissions (Scope 1 and Scope 2), actions on renewable energy have been largely accelerated with more investment in self-produced via a dedicated roadmap or externally produced (through Power Purchase Agreement) renewable energy via a formalized renewable energy purchasing roadmap,
  - **operations efficiencies –** Priority of the Group is given in decreasing the use of resources (raw materials, energy and water consumption, waste generation) through continuing process optimization and innovation as well as footprint consolidation with increased efficiency;
- **supply chain optimization** through near shoring and network optimization (e.g., part of production relocated to be closer to the market demand, consolidation of Rx labs, complete-pair offerings, etc.);
- **logistics optimization –** Projects span from modal shift (shifts in transportation mode) to the optimization of all shipments preparation, to the redesign of the Group supply chain (nearshoring/reshoring) while constantly monitoring all logistics flows and network optimization activities;
- **upstream improvement and others initiatives –** Significant emission reductions will also be achieved with the involvement of the direct suppliers in the reduction of their own emissions. Employees and customers are encouraged to take part in sustainability training and awareness initiatives available via a comprehensive online learning path on Leonardo, the Group's digital learning platform.

To know more about the above-mentioned levers refer to Section 2.1.5 *Actions and Resources* (e.g., actions and associated OpEx and CapEx). Regarding Taxonomy (please refer to Section 2.5 *EU Taxonomy Disclosure*), the Company is committed to continuously improving its alignment with the standards and will actively work toward integrating more projects and initiatives into alignment frameworks in the future.

EssilorLuxottica's Climate Transition Plan, acknowledged by the Board, is integrated into the Company's strategy and supports business resilience. The plan implementation leads to Group-wide interventions that facilitate the achievement of its 2030 carbon emission reduction targets. These include both efficiency programs that generate reductions, investment evaluation and planning. Sustainability-related capital and operating expenditures are part of EssilorLuxottica's annual financial planning process, focusing on the most strategic and priority ones, including self-produced renewable energy, renewable energy purchasing, improvement of the technical equipment, and investments in R&D (research of new innovative materials, eco-design with LCAs, developing internal recycling processes and upcycling products enhancing end-of-life, etc.).

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

In this respect, it is worth mentioning that these emissions reduction targets are not jeopardized by locked-in GHG emissions, as the Group does not manufacture GHG-intensive and energy-intensive products. In fact, the GHG emissions associated with the 'use of sold products' represent around 2% of the total GHG emissions of the Group. Moreover, regarding the assets owned by the Company:

- for existing facilities, the Group uses gas for heating and diesel fuel for generators in case of electricity shot-down and for a part of its company cars as well as petrol. Machineries and equipment to manufacture the products run mostly on electricity. Old equipment or installations are progressively replaced with more efficient technologies in order to limit the energy consumption and associated GHG emissions;
- regarding new facilities, they are built following high energy performance standards and low fossil fuel dependence.

2.1.4 Policies

Document	Main content	Function	Scope	Availability
Environment Health & Safety Policy	It articulates EssilorLuxottica's commitment to minimize all environmental, Health & Safety impacts resulting from its operations, products and services. With reference to minimizing environmental impacts, attention is on reducing GHG emissions (via energy efficiency improvements and, where sustainable, usage of renewable energy) and on the improvement of Energy, Environment and Health & Safety management systems according to international standards and internal procedures.	EHS	Own operations	Public
Climate Transition Plan	The document presents EssilorLuxottica's 1.5°C-aligned climate transition plan. The main contents are: • emissions reduction targets set as per SBTi requirements; • climate change mitigation and adaptation; • energy efficiency; • renewable energy deployment; • suppliers' engagement and the engagement of the stakeholders.	Corporate Sustainability and Product & Operations Sustainability	Own operations	Internal
Business Partners' Code of Conduct	It sets out the Group expectations toward its Business Partners in terms of, among other topics, environmental impacts. More specifically: EssilorLuxottica seeks Business Partners that address climate change and preserve the environment by reducing energy consumption, limiting carbon footprint across the value chain and being resilient to climate-related risks.	Compliance/ Sourcing & Procurement	Upstream and downstream	Public

The Group is also working on a dedicated Corporate energy management policy that will be issued in due course to complement the already existing local procedures.

2.1.5 Actions and Resources

To deploy its strategy and achieve its commitments, the Company, with the involvement of different functions has identified several decarbonization initiatives that are described below.

Product evolution

Increasing the use of renewable energy

In 2024, the Group installed and started up different on-site renewable energy plants on 10 sites and 9 countries (China, France, Italy, Mexico, Netherlands, Portugal, Thailand, UK and US). These investments add a new capacity of 37.8 MWp, and, in a full year, generate approximatively 58,909 MWh/year and reduce more than 31,000 tCO_2e/year.

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

- the installation of photovoltaic panels, ground mounted, in the facility of Barberini, Città Sant'Angelo (Italy), with a capacity of 20 MWp, able to generate 33,800 MWh/year;
- the installation of photovoltaic panels on the roof of Oakley's headquarter in the US, with a capacity of 1.9 MWp able to generate approximatively 3,190 MWh/year;
- the installation of photovoltaic panels on the roof of the factory in Rayong (Thailand) corresponding to a total capacity of 11 MWp that are expected to generate approximatively 15,600 MWh/year of renewal energy per year;
- the installation of photovoltaic panels on the roof of Tristar factory in Dongguan, China, with a capacity of 2.1 MWp able to generate approximatively 2,415 MWh/year.

Taking into account the actual operating hours of all on-site renewable energy plants in 2024, including the ones started up during the year, that brought only a partial contribution, the actual generated power is 20,902 MWh which would have emitted 10,913 tCO_2e more if the Group had not used renewable energy.

Over the next five years, the Group's renewable energy roadmap foresees the installation of more generating assets, in several different countries, and the achievement of a total on-site production of renewable electricity of more than 95,000 MWh/year (around 5% of the Group's electricity consumption), reducing more than 54,000 tCO_2e/year.

In addition, early 2025, a 5 MW biomass plant in the Agordo factory, Italy, will start operating, using residual biomass generated by the maintenance of local forests to generate thermal and cooling energy that will be used to cover the factory's need.

The Group has also continued to switch to renewable energy sources worldwide in 2024. Specifically, the supply of renewable energy covers a significant percentage of electricity consumption for its sites, offices and stores in Europe, including new countries such as Hungary. The Group has also continued to increase the renewable energy quota for the Asia-Pacific area. Without this renewable energy supply program, the Group would have emitted 550,000 tons of CO_2e emissions more in these countries in 2024, which is also reflected in the market-based Scope 2 emissions. Besides, it is worth noting that in 2023, EssilorLuxottica sites in Italy started using renewable energy following the 12-year Power Purchase Agreement (PPA) signed with ERG Power Generation for the supply of approximately 900 GWh of green energy between 2023 and 2034. The agreement is based on the sale by ERG for approximately 75% of the energy produced by its Partinico-Monreale wind farm near Palermo, Italy, which consists of 10 turbines of 4.2 MW with total installed power of 42 MW and an estimated annual production of 94 GWh.

Operations efficiency

Improving energy efficiency

Within the Group Operations' scope, it is worth listing some of the main initiatives for energy conservation pursued across different Business Units and Regions.

1. **Cooling optimization:** cooling applications for both process and conditioning can have an important impact in terms of energy consumption. As part of the Company's investments in cooling technologies optimization, in 2024, more than 15 cooling systems were replaced with higher efficiency units, or optimized with design or technology updates (adiabatic cooling systems, cooling tower technology, etc.). With the same approach, the company has budgeted to continue investing in the 2025-2030 period on technology turnover finalized to energy conservation, consisting in modifying or reengineering existing solutions and creating best practices on the design and management phase.
2. **Electric motors:** the large electrical motors used in the Group's major mass production sites for lenses have been identified as an opportunity for efficiency. In 2024, more than 70 motors were replaced with higher efficiency units, that can help to gain 3-5% of energy efficiency depending on the size and application. In 2025 and following years, the Company is planning further investments in newer and higher efficiency solutions combined to the technology turnover.
3. **AR Ecokit:** Anti-reflective Ecokit is a technical solution that Satisloh has identified to reduce the impact of the machines for thin film coating applications, which is among the most energy intensive technology in the lens manufacturing process. An energy reduction solution has been identified to reduce heat dispersion and energy consumption during the idle/no added value steps of the process. This solution has become a company standard for the new machines while there is a plan to install the same standard for all applications currently used in the different geographies. The initiative has been included in the 2025 budget to be continued and should be completed with 100% coverage of existing applications by 2026.

4. **Lighting:** LED technology for lighting applications both in the new facilities and in older ones has been identified as another opportunity for the Group to reduce the overall CO_2e emissions footprint. A specific standard has been defined for new lighting applications while, for existing ones, specific projects have been planned to identify the opportunities through the metering system distributed at regional level, building business cases with clear targets in terms of energy reduction. The plan is to continue to invest in 2025 and convert old facilities with new LED technology, covering all the production sites where incandescent technology is present.
5. **Compressed air**: thanks to energy metering, there are best practices identified and planned to be extended whenever there is the opportunity. An example is the usage of compressors to produce hot water to be reused in the process support equipment. In 2024, more than 10 sites have replaced their units with higher efficiency ones or reviewed design/pipe distribution to enhance overall performance. In 2024, the first facility with 100% heating solution coming from internal resources recovery using this technology was built in France, with more applications planned in the budget for the 2025-2030 period.

Regarding waste minimization initiatives that contribute to the carbon footprint reduction, projects are described in Section 2.4 *ESRS E5 – Resource Use and Circular Economy*.

EssilorLuxottica has also implemented environmental management systems that conform to the ISO 14001 standard. As a result, 37 of its manufacturing facilities, 20 lens laboratories, five distribution centers and three corporate offices are ISO 14001 certified, which covers around 32% of the total Group headcount.

In addition, associated with the Company's efforts to improve energy efficiency and structure its energy management systems, 12 of its manufacturing facilities, two lens laboratories, four distribution centers and three corporate offices have obtained ISO 50001 certification over the years which covers around 15% of the Group total headcount. ISO 50001 certification is complementary to ISO 14001 certification and enables the Company to assess the energy footprint of its sites and strengthen energy management.

Supply chain optimization

In 2024, EssilorLuxottica introduced its first sustainable supply chain roadmap, centred on the following four levers:

- reduce carbon footprint;
- optimize regionalization and replenishment;
- improve circularity;
- invest in low-carbon supply chain and stock.

To support the mapping and projection of supply chain flows for frames, components, and finished and prescription lenses, a digital modelling and simulation of the Group's own manufacturing and logistic footprint was started. The simulation, which included raw materials, aimed to deliver a five-year growth projection of the footprint and associated impacts, specifically on raw materials, energy, and logistics. Ultimately, this tool will help the Group to analyse scenarios and support manufacturing strategic decision-making.

Another strategic study on a complete pair service (delivering a pair of eyeglasses with prescription directly to a store) was launched to identify the sustainability benefits and limit the impacts. Supported by a Life Cycle Analysis, this study covered a pilot transformation project in Poland where the Group's retail stores are now served by the regional laboratory, providing better performances while saving 100% water and significantly reducing raw materials consumption and improving waste management. This study will support the scale up of the complete pair service within the Group. These initiatives are part of the strategy planned to be implemented until 2030.

Finally, a whole program of awareness and training on sustainability culture has been launched for the logistics and supply chain functions, and is planned to be completed by all supply chain teams globally by the end of 2026.

Logistics optimization

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

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

As more than 90% of its Logistics CO_2e emissions are coming from air transportation, the Group has identified 'alternative to air' transportation services with acceptable lead times in some major international lanes, in order to minimize the impact of switching from air to other transportation modes (e.g., rail transportation mode from Asia Pacific countries to Europe, Middle East, Africa countries and fast boat solutions from Asia Pacific countries to North America destinations). This initiative was boosted in 2024 with the switch to ocean and train shipments for frames from Asia Pacific countries to Europe Middle East Africa and North America destinations. The plan for the coming years is to continue to increase the percentage of 'alternative to air' transportation modes that will be the main contributor to commit with the near-term CO_2e emissions reduction targets by 2030. For both frames and lenses, the target is to increase progressively, starting from 2024 until 2030, the percentage of 'alternative to air' transportation modes, moving from 7% to 40% for frames and from 60% to 80% for lenses.

Air fleet renewal & optimized routings for urgent orders

At the beginning of 2024, EssilorLuxottica started an initiative dedicated to prompting its suppliers to use the lowest CO_2e emissions air transportation by combining the latest generation of aircraft models with the most efficient and optimized routings. Thanks to an exhaustive mapping among many market solutions proposed by the suppliers, reductions of up to 35% of CO_2e emissions can be realized during an international air flight. These reductions result from a comparison between a first option, combining the utilization of previous generation aircraft passengers models and a multi-route itinerary until final destination, and a second option made of direct cargo routes using the latest generation of aircraft cargo models. This initiative is part of the strategy planned to be implemented progressively until 2030 on all international lanes representing the highest shipment volumes.

On top of that, from now on, this performance criteria will be included in the selection process of awarding the international lanes to the Group's suppliers during the yearly Request For Quotation process. Moreover, the suppliers will be monitored on a monthly basis according to the committed agreements regarding the overall emissions recorded on the specific international lanes awarded.

Last mile segmentation

Another initiative to reduce the Group logistics' emissions refers to the maximization of road transportation concerning all domestic flows, benefiting from an emission factor intensity 5 to 10 times lower than that of air transportation. In the steps toward the decarbonization of transportation, EssilorLuxottica has also invested in the electric mobility for goods transportation. Starting from June 2024, an owned electric truck has been activated for transporting goods from the Italian distribution center based in Sedico to the hub of an Italian logistics partner.

Shipment optimization

Several actions have been implemented and progressively deployed in several entities of the Group in the last two years to benefit from the optimization of all shipment preparation. One of the broader actions refers to the systematic consolidation of more and more shipments from different entities in the same country, as well as shipments to different customers in the same region. The Group has also generalized the usage of stackable pallets enabling an increased fill rate of up to 74% globally on the containers shipped from Asian and Latin American entities in 2024. Also the fill rate of the carton boxes used for the finished or semi-finished lenses shipped from Asian, North American and Latin American entities has increased up to 82% in 2024. The 2030 goal is to standardize the usage of stackable pallets in order to reach at least 80% of container saturation, as well as to progressively raise the fill rate of carton boxes to an average of 90%.

Industrial process & network optimization

The Group is benefiting from the nearshoring of some lens volumes produced in the Asian manufacturing sites closer to the European and American markets thanks to an increased automation in the semi-finished lens casting processes. According to the progressive roll out of this automation until 2030, the target is to transfer more lens production volumes to the European and American manufacturing sites to cover the respective markets, thereby also reducing transportation distances and therefore carbon emissions.

Moreover, the Group is working on the manufacturing of lighter semi-finished lenses, which will also contribute to reducing CO_2e emissions resulting from transportation.

Upstream improvement and others initiatives

Building guidelines

The Company's 'New Building Guidelines' include criteria to obtain Gold level LEED certification for all of its new manufacturing and distribution buildings and climate-related criteria such as renewable energy consideration, air emissions, water risk management, waste management and site location selection including climate risk analysis. These criteria attest that the design and construction respect the surrounding ecosystem and were applied to the facilities built in recent years in France, Thailand and Mexico. Sustainability considerations are also applied to the Group's store network, as described in Section 2.4 *ESRS E5 – Resource Use and Circular Economy*.

Engaging all stakeholders on the climate journey

Communication and training on the Eyes on the Planet program for employees and customers support the execution of the aforementioned actions and measures. An example is the Eyes on the Planet Newsletter, that in 2024 increased its audience reaching via mail to over 100,000 employees for each issue and focused on climate actions and key sustainability projects within the Group.

A specific dashboard with key environmental performance information for the Group's main Operations sites is also regularly updated in production sites to raise awareness on environmental topics.

In addition, interactive climate change awareness workshops, designed for small groups to increase awareness on climate change consequences and engage employee action reached more than 4,500 employees across 51 countries, counting a total of more than 1,100 workshops delivered since their initiation in 2020. Virtual classrooms on climate change are also regularly hosted on the Leonardo learning platform.

External stakeholders are equally important for EssilorLuxottica's ambition to lead by example with its climate and sustainability journey. In 2024, the third edition of its 'Sustainability Week' took place on Earth Day to support the official Earth Day 2024 theme – 'Planet vs. Plastics' – and raised awareness on sustainable practices.

Throughout the week, live events were hosted on EssilorLuxottica's Leonardo learning platform to present 'Sustainability and Mission: 2023 Highlights' and 'Eyes on the Planet vs. Plastics', each attracting over 3,000 participants, including employees and customers, twice the audience of the previous edition, which further confirms the increasing importance these topics have in the Company's ecosystem.

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

Reducing Scope 3 emissions is a key element of EssilorLuxottica's climate journey. As shown in Section 2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)*, Scope 3 emissions represent more than 85% of the Group's carbon footprint, with a significant part related to the purchasing of raw materials, components, products and services. Some of the Group's key suppliers have been asked to complete a questionnaire to share information about their sustainability strategy to reduce their own carbon emissions, the availability of emission factors and Life Cycle Analysis data related to products and services purchased by the Group. This questionnaire has been built to engage with suppliers with the purpose of creating synergies to lower the entire value chain emissions and to further increase the accuracy of the Group carbon footprint assessment. In line with its new Scope 3 emissions reduction target, the Company will bring its suppliers and business partners along its decarbonization journey.

In total, all the initiatives mentioned in this section enabled the Group to reduce its emissions by approximately 450,000 tons of CO_2e in 2024 compared to the 2022 baseline. This impact does not take into consideration other aspects that might affect the Group emissions. The overall trend of the Group GHG emissions is disclosed in 2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)*.

However, these different actions are preconditioned by the availability of financial support, the local regulatory frameworks, the energy market conditions and the engagement of the suppliers in this journey.

In this respect, associated CapEx amounted to €29 millions in 2024. Total CapEx is reported in Chapter 5 of the 2024 Universal Registration Document, Section 5.1.6 *Notes to the Consolidated Financial Statements*, Note 10 *Goodwill and Other Intangible Assets*, Note 11 *Property, Plant and Equipment*, and Note 12 *Leases to* the financial statements.

Regarding the EU Green Taxonomy, information is available in Section 2.5 *EU Taxonomy Disclosure*. Differences in CapEx amounts can be explained by the fact that that the Group launched some energy reduction initiatives that are not considered eligible (e.g., eco-kit or replacement of motors), as these actions are not described in the current version of the regulation.

2.1.6 Targets

Since its creation, EssilorLuxottica has been committed to minimizing its environmental impact throughout the entire value chain, aiming to mitigate the effects of climate change on the planet. The first Group milestone set in 2021 regards the reduction and neutralization of the carbon footprint of its direct operations (Scopes 1 and 2) globally by 2025 (already achieved in Europe in 2023).

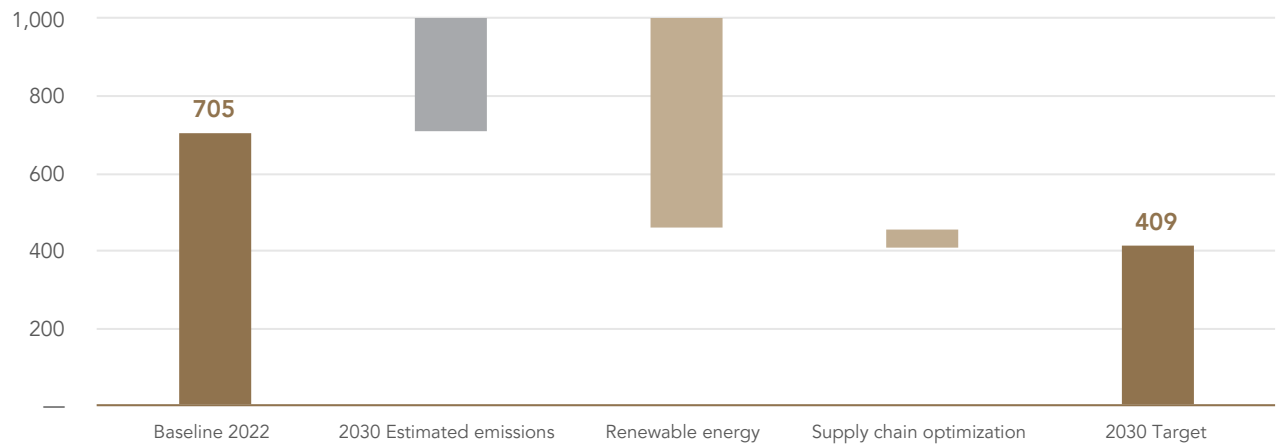
A new key step in the Company's efforts to reduce the environmental impact across its entire value chain has been achieved with the validation of near-term greenhouse gas (GHG) emissions reduction targets by the Science-Based Targets initiative.

As mentioned in Section 2.1.3 *Transition Plan for Climate Change Mitigation*, EssilorLuxottica committed to reducing absolute Scopes 1 and 2 GHG emissions by 42% by 2030, from a 2022 base year. Additionally, the Group committed to reducing absolute Scope 3 GHG emissions from purchased goods and services (not including Equipment, Instruments and Wearables sub-categories), fuel- and energy-related activities, upstream transportation and distribution, and waste generated in operations by 25% within the same timeframe.

The Group designed its emission reduction plan for Scopes 1 and 2 and for Scope 3 by firstly estimating the potential increase of its emissions up to 2030 excluding any emissions reduction impact deriving from its decarbonization initiatives. Afterwards, the impact of the different decarbonization levers was estimated for the same timeframe and applied to the model. These levers and their related impact are described in Section 2.1.5 *Actions and Resources*.

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

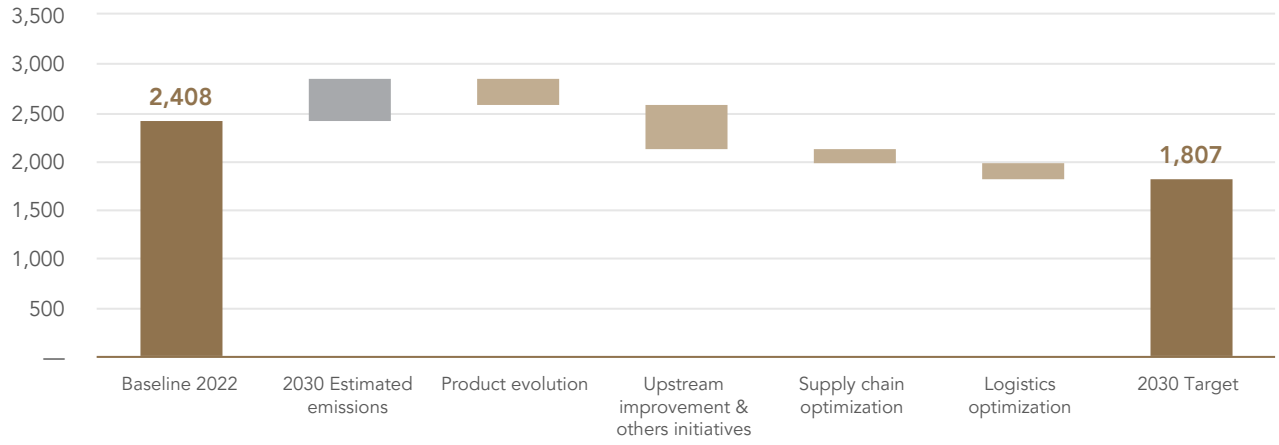
Scopes 1 & 2 emissions reduction plan *(Ktons CO_2e)*



With regards to Scopes 1 and 2, the Group will continue to invest in the renewable energy production and purchase while expanding the application of its best practices on efficiency and optimizing its supply chain network.

In the baseline 2022, Scope 1 represented 23% of the combined Scopes 1&2 emissions and Scope 2 represented the remaining 77%. The Scopes 1 and 2 target has been validated by SBTi, recognized as in line with the '1.5 degrees' path.

Scope 3 emissions reduction plan *(Ktons CO_2e)*



On Scope 3, instead, EssilorLuxottica plans to benefit from the evolution of its products, by lowering their impact from an energy and materials usage perspective, as well as from the described levers related to supply chain and logistics optimization and from improvements on the upstream part of its value chain.

The Scope 3 target has been validated by SBTi, recognized as in line with the 'well-below 2 degrees' path and in line with the climate mitigation efforts outlined in the Paris Agreement adopted by the United Nations in 2015.

It is worth noting that the 2022 baseline emissions are slightly different from the 2022 data reported in the 2023 Universal Registration Document following some refinements during the target validation process. The table below summarizes the Company's Scopes 1 and 2 and Scope 3 science-based targets.

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

Consistency of GHG emissions reduction targets with GHG inventory boundaries has been ensured during the target submission and validation processes with SBTi. Cross-sector pathway provided by SBTi was used. The target boundary includes land-related emissions and removals from bioenergy feedstocks.

Specific targets for climate change adaptation, renewable energy deployment and energy efficiency have not been set.

2.1.7 Energy Consumption and Mix

Below is a table summarizing the Group's energy consumption for 2024 by energy type.

	2024 value
Total electricity consumption	**1,923.76**
Of which produced on site from renewable sources:	*20.90*
• *from photovoltaic panels*	*20.90*
Of which from renewable energy credits	*927.36*
Of which purchased from the local grids	*975.50*
• *from nuclear*	*94.97*
• *from fossil coal*	*224.23*
• *from oil*	-
• *from natural gas*	*330.40*
• *from other fossil fuel sources*	*20.84*
• *from renewable sources*	*305.06*
Steam *(GWh)*	**6.04**
• from fossil fuel sources	4.56
• from renewable sources	1.48
Liquid fuel *(GWh)*	**16.12**
• from fossil fuel sources	16.12
• from renewable sources	-
Natural gas *(GWh)*	**215.01**
Fuel for Company cars *(GWh)*	**4.97**
Coal and coal products	-
Other fossil sources	-
Non-renewable energy production	-
Consumption of self-generated non-fuel renewable energy	-
TOTAL FOSSIL ENERGY CONSUMPTION *(GWh)*	**816.13**
Share of fossil sources in total energy consumption *(%)*	38%
Consumption from nuclear sources *(GWh)*	**94.97**
Share of consumption from nuclear sources in total energy consumption *(%)*	4%
TOTAL RENEWABLE ENERGY CONSUMPTION *(GWh)*	**1,254.80**
Share of renewable sources in total energy consumption *(%)*	58%
TOTAL ENERGY CONSUMPTION *(GWh)*	**2,165.90**

For more information on the reporting rules for energy and on the estimation methodology, please refer to Section 5 *Methodology Note*.

In 2024, the Group energy consumption remained at a similar level as 2023 (2,149 GWh). In line with EssilorLuxottica's climate roadmap, the Group has continuously extended the use of renewable energy. Specifically, thanks to the constant investments and gradual roll-out of photovoltaic panels, the on site production of renewable energy increased by 65% in 2024. Meanwhile, the amount of purchased renewable energy with Energy Attribute Certificates (EACs) has registered an increase of 32% compared to the previous year.

In 2024, the distribution of energy consumption per geographical area was as follows: Asia-Pacific (43%), EMEA (28%), North America (20%) and Latin America (9%).

The energy intensity is 0.08kWh/€. The sector used is 'Manufacture of medical and dental instruments and supplies' as this is the NACE code of the Group. The revenues used are €26,508 million as mentioned in the financial statement in Chapter 5 of the 2024 Universal Registration Document, Section 5.1.1 *Consolidated Statement of Profit or Loss*.

Renewable energy credits

As described in Section 2.1.5 *Actions and Resources*, the Group is constantly working to switch to renewable energy sources worldwide and thanks to the renewable energy purchasing program, more than 550,000 tons of CO_2e emissions have not been emitted in 2024. The percentage of contractual instruments purchased is split between: International Renewable Energy Certificates (I-RECs) for 52%, Guarantee of Origin (GOs) for 39%, Tradable Instruments for Global Renewables (TIGR) for 10% and Renewable Energy Guarantee of Origin (REGO) for 2%.

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

EssilorLuxottica applies the Operational Control, as defined by the GHG Protocol, as Consolidation approach for its GHG emissions mainly due to its vertical integration, with the willingness to consider all the emissions linked to the actions driven by the Group.

In 2024, EssilorLuxottica updated its carbon footprint assessment globally, with the involvement of different functions across the organization, including Procurement, Logistics, EHS, Product & Operations Sustainability, Operations Engineering, HR, Real Estate and Finance. Following the guidelines of the GHG Protocol, the analysis provided a complete understanding of the Company's direct and indirect CO_2e impacts at each stage of the value chain, including a clear overview of all Scope 3 emissions relevant to the Group activities. The Company is constantly working to improve and refine the process to assess its carbon footprint.

	2024	Base year 2022	Absolute evolution
SCOPE 1 GHG EMISSIONS *(tCO_2e)*	**116,092**	**160,244**	**(44,152)**
Stationary combustion	49,536	56,644	(7,108)
Mobile combustion	18,468	19,926	(1,458)
Fugitive emissions	48,088	83,674	(35,586)
LOCATION-BASED SCOPE 2 GHG EMISSIONS *(tCO_2e)*	**958,447**	**788,024**	**170,423**
Electricity consumption – Location-based	956,580	787,360	169,220
Company cars – Location based	133	215	(82)
Steam	1,734	449	1,285
MARKET-BASED SCOPE 2 GHG EMISSIONS *(tCO_2e)*	**475,555**	**544,442**	**(68,887)**
Electricity consumption – Market-based	473,579	543,771	(70,192)
Company cars – Market-based	242	222	20
Steam	1,734	449	1,285
SCOPE 3 GHG EMISSIONS *(tCO_2e)*	**3,528,307**	**3,422,043**	**106,264**
1. Purchased goods and services	1,879,135	1,822,207	56,928
2. Capital goods	370,364	439,864	(69,500)
3. Fuel- and energy-related activities (not included in Scope 1 or Scope 2)	127,852	171,843	(43,991)
4. Upstream transportation and distribution	390,546	431,587	(41,041)
Of which Logistics managed by EssilorLuxottica	*313,863*	*302,789*	*11,074*
Of which Logistics managed by suppliers	*76,682*	*128,798*	*(52,116)*
5. Waste generated in operations	36,922	49,422	(12,500)
6. Business travel	41,126	42,171	(1,045)
7. Employee commuting	127,025	80,399	46,626
10. Processing of sold products	383,781	161,543	222,238
11. Use of sold products	80,879	72,826	8,053
12. End-of-life treatment of sold products	46,315	59,219	(12,904)
14. Franchises	34,434	46,291	(11,857)
15. Investments	9,929	44,672	(34,743)
TOTAL GHG EMISSIONS (LOCATION-BASED) *(tCO_2e)*	**4,602,846**	**4,370,311**	**232,535**
TOTAL GHG EMISSIONS (MARKET-BASED) *(tCO_2e)*	**4,119,953**	**4,126,729**	**(6,775)**
Scopes 1 & 2 GHG emissions (market-based) part of the science-based target	591,647	704,686	(113,040)
Scope 3 GHG emissions part of the science-based target	2,390,706	2,407,658	(16,952)

EssilorLuxottica's reporting boundaries consider emissions from the relevant Scope 1, Scope 2, and Scope 3 categories. Scope 3 emissions from GHG categories 'Upstream Leased Assets' (3.8), 'Downstream Transportation and Distribution' (3.9) and 'Downstream leased assets' (3.13) are excluded since they are considered not relevant or applicable to the EssilorLuxottica context. None of the Scope 1 GHG emissions are regulated by trading schemes.

In 2024, the total GHG emissions disclosed in the table above show a slight increase applying both a location and a market-based approach. The Group applies the market-based method for the planning and deployment of its decarbonization strategies, as well as for the emissions reduction targets set in the reporting year. The GHG category that mainly led to an overall increase of emissions is the 'Processing of sold products' (3.10), affected by a substantial review of the emission factors applied, including all the possible consumptions deriving from the processing of sold lenses by customers.

However, focusing the analysis only on the GHG emissions in the categories included in the Company's science-based targets, a significant decrease can be appreciated in Scope 1 and 2 emissions compared to the baseline, as well as a slight improvement in Scope 3 emissions. The advancements in the switch to renewable energy, in fact, are largely supporting the reduction of Scope 1, 2 and 3 GHG emissions.

The Group is also committed to reducing of all the other GHG categories, expecting a progressive impact of the different decarbonization levers described in Section 2.1.5 *Actions and Resources* soon to be reflected in the Group carbon footprint. Moreover, EssilorLuxottica continuously seeks to identify new initiatives to further reduce its GHG emissions and considers the involvement of its stakeholders key to achieving a low-carbon future.

In 2024, the distribution of Scope 1 emissions per geographical area was as follows: Asia-Pacific (33%), EMEA (45%), North America (15%) and Latin America (7%). The distribution of Scope 2 location-based emissions per geographical area was as follows: Asia-Pacific (66%), EMEA (14%), North America (14%) and Latin America (6%); as for Scope 2 market-based emissions, the geographical distribution was as follows: Asia-Pacific (49%), EMEA (9%), North America (29%) and Latin America (12%).

Biogenic CO_2 emissions that occur in the value chain are not included in the Scopes, nor is the CO_2 uptake, since the amount of biogenic materials is not relevant for EssilorLuxottica and the method applied to calculate the emission factors considered do not include biogenic CO_2 emissions and uptake. For more information on the calculation and estimation methodology and related emission factors used, please refer to 5 *Methodology Note*.

In 2024, EssilorLuxottica's carbon intensity per euro of revenue amounted to 0.174 kg CO_2e/euro for location-based calculated emissions and 0.155 kg CO_2e/euro for market-based calculated emissions. In 2024, the Group's revenue equalled €26,508 million as reported in the financial statements (see Chapter 5, Section 5.1.1 *Consolidated Statement of Profit or Loss* of the 2024 Universal Registration Document).

To respond to the increasing demand for environmental transparency, EssilorLuxottica has disclosed through the Carbon Disclosure Project (CDP) Climate Change questionnaire since 2022, and in 2024 received an 'A-' score (after a 'B' score in 2023), in recognition of the improved environmental disclosure and performance.

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

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

2.1.9 GHG Removals and GHG Mitigation Projects Financed Through Carbon Credits

The Company invests in natural ecosystem projects and buys carbon credits generated by nature-based projects or energy projects. EssilorLuxottica set selection criteria that consider projects located in countries where it operates and that have a positive impact on biodiversity and socio-economic development of local communities (e.g., creation of job opportunities). The Company's criteria consider only carbon credits that have a vintage within five years from the date of retirement and are verified by well-recognized international standards (e.g., Verified Carbon Standard – VCS – or Gold Standard).

Moreover, EssilorLuxottica requires evidence from its carbon-credit suppliers of their own specific due diligence for the projects selected. In 2024, the Company selected two VCS certified projects to support the afforestation of native species plants in barren lands in China and the generation of clean electricity through renewable solar energy sources in India, in line with Group's efforts on its own value chain.

To support the achievement of carbon neutrality in Europe in 2024, balancing the residual emissions related to Scope 1 and Scope 2, approximately 81 ktCO_2e of VCS certified carbon credits, with a vintage lower than five years, have been retired. Out of these 81 ktCO_2e, more than 20% refer to removals related to the selected afforestation project in China, a project ICROA (International Carbon Reduction and Offset Alliance) approved and CCB (Climate, Community and Biodiversity) certified. The residual part, instead, refers to reductions deriving from the renewable solar power projects selected in 2024 and 2023 in India.

In fact, carbon credits for 19.8 ktCO_2e retired in 2024 were still available from the selection performed in 2023. The projects supported are selected on a yearly basis, thus a year over year comparison is not relevant. A residual part of carbon credits purchased in 2024 and not retired will be canceled in 2025, accounting for 24 ktCO_2e.

Carbon Credits canceled in the reporting year	Verification standard	*tCO_2e*
TOTAL CREDITS CANCELED	**-**	**81,482**
Removal – afforestation	Verified Carbon Standard	17,000
Reduction – solar panel installation	Verified Carbon Standard	44,682
Reduction – solar panel installation	Verified Carbon Standard	19,800
SHARE FROM REMOVAL PROJECTS *(%)*		**21%**
SHARE FROM REDUCTION PROJECTS *(%)*		**79%**
% for each recognised quality standard	100%	100%
% issued from projects in the EU	-%	-%
% that qualifies as a corresponding adjustment under Article. 6 of the Paris Agreement		-%
Carbon credits planned to be canceled in the future		23,318

2.1.10 Internal Carbon Pricing

The Group has not implemented an internal price on environmental externalities for the time being. However, a specific analysis will be devoted to the topic in due course.

2.2 ESRS E2 – Pollution

2.2.1 Introduction

EssilorLuxottica is committed to eliminating or minimizing all possible impacts on the environment and on Health & Safety deriving from its operations, products and stores throughout the design, manufacturing, distribution, and use of its products. This implies ensuring its products and operations are safe for its employees, customers and consumers as well as for the environment, in compliance with chemical and product safety regulations. The Company indeed implements strict control over hazardous substances in chemicals, materials and components and ensures the replacement of those with unacceptable risk.

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

2.2.2 Material Impacts, Risks and Opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Pollution Prevention	Risk of infringements of pollution-related regulations and of cost due to remediation actions	Failing to reduce the environmental impacts of air or water pollution from the manufacturing sites and lens laboratories could lead to non-compliance with pollution prevention regulations, resulting in penalties, fines, increased operational costs and legal liabilities. Additionally, regulatory violations could damage the company's reputation, leading to loss of consumer trust, investor confidence, and market competitiveness.	• EHS Policy • Business Partners Code of Conduct • Product Stewardship – Safety and Compliance of Chemicals, Materials and Components Policy	• Zero PCL1 chemicals in its manufacturing processes • No introduction of PCL2 chemicals or PFAS for new products and processes
Product Safety	Potential impact on human health and the environment	Potential exposure to substances of concern and microplastics could threaten health, causing allergic reactions, toxicity, or long-term health issues. Additionally, the release of microplastics and harmful chemicals into the environment during production process, use, or disposal of products can lead to water contamination and contribute to broader environmental degradation.		

2.2.3 Policies

Document	Main content	Function	Scope	Availability
Environment Health & Safety Policy	It articulates EssilorLuxottica's commitment to minimize the environmental impact of its operations, products and services, by: • reducing the emissions of any pollutants; • reducing the production of waste by facilitating reuse and recycling of materials; • reducing the use of substances that are potentially hazardous for the people and the environment; • constantly improving the condition of its workplaces, by identifying hazards, assessing Health & Safety risks and implementing suitable preventive measures to eliminate hazards and reduce risks.	EHS	Own operations	Public
Business Partners Code of Conduct	It sets out the Group expectations toward its Business Partners in terms of, among others, environmental impacts. EssilorLuxottica seeks Business Partners that implement and/or pursue initiatives that contribute to the decrease of environmental impacts by responsibly managing natural resources, protecting local biodiversity and natural ecosystems, and preventing pollution and deforestation.	Compliance/ Sourcing & Procurement	Upstream and downstream	Public
Product Stewardship – Safety and Compliance of Chemicals, Materials and Components Policy	Product Stewardship is a Health & Safety and environmental management strategy that involves proactive management of chemicals and materials to design, produce, sell, or use a product. The objective of this document is to outline management methods and parties involved in product stewardship, including to: • ensure compliance with chemical regulations/laws; • extend awareness of the relevance of compliance to legislation/ law across the whole Group; • ensure that risks associated with the storage, use and disposal of chemicals and materials within EssilorLuxottica workplaces are controlled and managed; • state roles and responsibilities of subjects involved in product stewardship and chemical management activities as well as related control principles; • define rules and guidelines that must be followed to guarantee achievement of product stewardship objectives; • regulate roles and responsibilities of parties involved as well as related control principles. Through this policy, EssilorLuxottica manages the internal list of prohibited and restricted chemicals and also presents risk assessment and control measures as well as emergency procedures. The document is based on relevant standards, such as ISO 45001 (occupational Health & Safety), ISO 14001 (environmental management systems), ISO 13485 (medical devices – Quality management systems), ISO 9001 (quality management systems), and the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). Requirements set up for EssilorLuxottica prohibited and restricted chemicals list and PCL (priority chemical levels) rules are a worldwide internal policy even if local regulatory requirements may be less strict.	EHS	Own operations	Internal

In addition to these Corporate policies, different local procedures can also be available and overseen by local management, for example, action plans for Emergency or Incident, investigation procedure and an approval process for new chemicals and direct materials.

2.2.4 Actions and Resources

To ensure the elimination and minimization of possible impacts on the environment and on the Health & Safety of its value chain, EssilorLuxottica has set several initiatives as summarized below:

Water quality

The quantity and quality of water discharge are monitored and managed, in particular whenever these aspects might face any risk of being affected by operations processes. EssilorLuxottica has invested in on-site wastewater treatment systems at several of its facilities that integrate treatment and recycling of wastewater into a single flow or complete process.

In addition, suspended material parameters are monitored within the 'Wastewater Model' program, which helps to identify required actions to prevent water discharge incidents outside permitted limits, especially due to the reduction of water withdrawal that will consequently increase the concentration of pollutants. It also helps create opportunities for water close-loop solutions, thus making water itself reusable and compatible with manufacturing processes.

To reduce water use and recover wastewater, on-site closed circuit water recycling systems have been installed for prescription lenses generation processes and in galvanizing plants and painting processes. In addition, a project for cascading water in the hard-coat process has been completed in European Rx labs, allowing to re-use water in the different sequential steps of the process.

Air emissions

In terms of air pollution, the Company complies specifically with international, regional or local regulations, applying and managing air emissions permits where needed. Through regional/local guidelines, the EHS function supervises the process to determine if an air permit is needed and to support the business in applying for it and managing all the compliance requirements in the activities. Where specific requirements are in place, treatment systems are implemented and managed to guarantee compliance with all permitted parameters. One example is the treatment of volatile organic compounds, as some of the sites using coatings processes are required to install regenerative thermal oxidizer systems to remove solvents from air emissions and comply with emissions limits.

Microplastics and plastic pollution

Microplastics and plastic pollution are given great attention by the Company, ensuring that plastic particles are not released from its operations process into the environment. Sources of microplastics have been identified, for example, the residual from the generation of prescription lenses and acetate frames swarf. There is a strong focus on how to avoid their introduction in the Operations processes, reuse/recycle this material in a circular way or to valorize whenever it becomes waste. As of today, microplastics are either disposed of or thermally valorized (using ashes in downstream processes to avoid any waste residual), or recycled for specific applications, regulated by the internal policy on waste recycling.

Substances of concern/high concern

EssilorLuxottica is committed to protecting the Health & Safety of its employees and customers and the security of its products as well as ensuring a safe workplace. The Company's prohibited and restricted chemicals list and Priority Chemical Levels (PCL) rules are a worldwide internal policy based on existing compulsory global regulations, with stricter limitations compared to local regulations should there be evidence that they may present safety risks for people and the environment. Three priority chemical levels (PCL) and associated actions have been identified as follows:

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

All existing chemical inventories must be screened by facilities on a regular basis to track PCL chemicals. Moreover, the Group has been working on the creation of a unique 'Chemicals Management tool' to allow a strict control of existing and new chemicals, managing compliance, industrial hygiene and risk assessment for any new chemicals introduced in the manufacturing processes and ultimately assessing, controlling and mitigating the risk in a proactive manner. The rollout of this digital solution on the entire scope of Operations is expected to be completed by the end of 2026. Also, the Company is working to implement a comprehensive global database of all the Environmental permits, in 2025, to facilitate central compliance monitoring.

In addition, regulatory bodies' attention to per- and polyfluoroalkyl substances (PFAS) is increasing due to their ability to accumulate in the environment. Existing PFAS at EssilorLuxottica are being progressively replaced by non-PFAS alternatives and the Group is committed to not introducing any new PFAS. Therefore, any new chemical or direct material containing PFAS cannot be approved unless there are special circumstances, and requests for temporary derogations in such cases must be reviewed and approved by Business Unit Leaders and the EHS function. As PFAS information is often missing in the chemical composition included in safety data sheets and/or other relevant documentation, it is necessary to request information from suppliers to ensure chemicals/or direct materials do not contain PFAS. A signed PFAS declaration must be obtained from the supplier prior to a new chemical/or direct material being approved by EHS and introduced at a facility. Thousands of different PFAS are listed in the prohibited and restricted chemicals list as PCL1, PCL2 or PCL3. However, as the PFAS category is very broad and there is no existing exhaustive inventory of PFAS with their CAS (Chemical Abstracts Service) numbers, it is necessary to use the PFAS definition covering the following structural formula to request information on PFAS: 'PFAS is defined as a chemical substance, or polymer, that includes at least one aliphatic (-CF2-) or (-CF3-) element'.

Value chain engagement

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

2.2.5 Targets and Metrics

In alignment with EssilorLuxottica's Global EHS Policy, targets related to pollution refer to any international, regional or local regulations that may apply to the Company's Operations.

Regarding substances of concern/high concern, EssilorLuxottica yearly aims at zero PCL1 chemicals in its manufacturing processes as well as no introduction of PCL2 chemicals or PFAS for new products and processes. In 2024, no PCL1 chemicals have been introduced and no PCL2 or PFAS have been approved for new products/processes, through the Corporate approval process.

2.3 ESRS E3 – Water and Marine Resources

2.3.1 Introduction

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

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

2.3.2 Material Impacts, Risks and Opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Water Management	Risk of inefficient water management practices	Excessive water use and withdrawals, uncontrolled discharges or leaks of wastewater, can disrupt supply chains, particularly for water-dependent processes leading to higher operational costs, production delays, potential water pollution and regulatory fines.	• EHS Policy • Business Partners Code of Conduct	• Water withdrawals
	Use of water resources that might impact local communities and the environment	Negative environmental damage (e.g., depletion of natural water resources resulting in the decay of related ecosystem services) due to inadequate water management, particularly in water-stressed areas, that can impact local communities.		

2.3.3 Policies

Document	Main content	Function	Scope	Availability
Environment Health & Safety Policy	It articulates EssilorLuxottica's commitment to minimize the environmental impact of its operations, products and services, by using natural resources (such as water) and raw materials rationally and reducing emissions of any pollutants.	EHS	Own operations	Public
Business Partners Code of Conduct	It sets out the Group expectations toward its Business Partners in terms of, among others, the environment. More specifically: EssilorLuxottica seeks Business Partners that address climate change and preserve the environment by reducing water use.	Compliance/ Sourcing & Procurement	Upstream and downstream	Public
Waste Policy	The objective of this document is to regulate management methods and parties involved in relation to waste management, including wastewater cases.	EHS	Upstream and own operations	Internal

EssilorLuxottica's water management policy will be issued in 2025 and will articulate the Company's approach and guidelines on water management and treatment. This document will supplement the local procedures that already exist.

2.3.4 Actions and Resources

Maximum attention is given to those water saving solutions that can limit withdrawals, especially in the regions at risk, and avoid direct discharge, making it possible to recycle or repurpose the process water internally. In this way, through specific tech solutions, it's possible to close loops in the Operations applications, reducing the water volumes withdrawn and maintaining the quality required for its reuse.

Water risk assessment and reduction of water use

Water risks are periodically assessed in key areas where EssilorLuxottica sites are located. By doing so, the Company can identify potential impacts and monitor the implementation of water stewardship projects.

Based on an analysis performed through the WWF Water Risk Filter, around 5% of the analysed assets accounting for less than 1% of the Company's current total water withdrawals (around 60,000 m^3), were exposed to very high or extreme water scarcity risks.

EssilorLuxottica mitigates related water risks by defining a more stringent water roadmap for these sites with specific water efficiency targets, water supply management and interaction with local communities. Overall the Company undertakes several actions to reduce its water withdrawals, which include:

- water mapping for equipment using water for main laboratories and mass production sites;
- installation of 'smart' meters to accurately measure water use with different levels of granularity, which help structural improvements of traditional resource-heavy processes, such as galvanization;
- comparison of site water performance with the benchmark process or 'water model';
- closed-circuit water recycling systems have been installed for prescription lenses generation processes – standard application that has been defined as best practice and standardized across the organization, with huge focus in North America, and Mexican area where water stress is relevant;
- defining a medium-term plan to reduce water use at site level.

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

Manufacturing sites

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

In 2024, the Company invested in wastewater treatment systems at different sites to close the loop of manufacturing processes, treat the water and make it reusable in the same upstream processes.

The level of treatment quality depends on the reuse purpose, and this kind of initiative has been pursued in 5 main sites across different geographies as Best Practice, with the plan to continue into 3 other main sites and additional smaller sites in 2025.

For frames production in Italy, many initiatives have been implemented over the last years such as a wastewater treatment system in its Rovereto plant, which has reduced liquid waste generated by barrelling and galvanic processes by an estimated 2,700 m^3 of waste per year. In 2024, a wastewater treatment system was implemented in Sedico for a potential 9,000 tons/year.

Other important initiatives have been implemented in its Agordo plant, including: the installation of an evaporator system with an estimated yearly reduction of 80 tons of waste; a metal tank regeneration project that decreased waste by around 1,000 tanks per year and optimization of the wastewater treatment system, adding an intermediate tank to improve the saturation of the treatment and, consequently, decreased the final waste produced.

The development of production processes that can allow the Company to eliminate water rinsing steps or reduce the current withdrawals is another area of focus. A clear stream for investigating a more sustainable approach is ongoing. At the same time the focus in 2024 has been on reducing the current withdrawal through a standardized approach for efficiency across Regions involving different departments. The plan is to continue in 2025 and define Corporate guidelines for the more water intense processes.

Rx manufacturing process

The Company has also focused on hard-coating applications, with many sites increasing the water reuse rate.

In addition, a water cascading project in the hard-coating process has been completed in European Rx labs, which saves up to 0.5 liters per lens (representing around a 15% decrease in total water withdrawals in the specific process).

In addition, continuous process optimization has led the Company to scale a technique for surfacing residue compaction of all substrates. This reduces the weight and volume of waste (less picking rotation, with an impact on CO_2e emissions), and recycles water. Water is then filtered and reinjected into the prescription laboratory's in-house system, following a circular approach.

Cooling systems

Another initiative that has been spread across the different regions and Business Units relates to the cooling systems using water for adiabatic technology, where the process can be 'closed' reusing the cooling water, controlling the hardness of water, and drastically reducing the withdrawn portion. Specifically, the application in 2024 has been finalized in one big plant in the US and planned for 2025 in other sites, with a focus on North America.

Value chain engagement

In addition to the actions implemented in its own operations, EssilorLuxottica monitors the risks related to water management along its value chain, monitoring the potential and actual impacts of its suppliers. Regarding water supply and wastewater, as part of the Responsible Sourcing audits, suppliers are requested to monitor and report their water and wastewater usage and have a wastewater treatment plant when applicable and relevant. For more information on the Company's responsible sourcing program refer to Section 3.2 *ESRS S2 – Workers in the Value Chain*.

2.3.5 Targets and Metrics

Specific targets on water management at Group level will be set in due course, but for the time being, the Company tracks the effectiveness of its strategy through the metric related to water withdrawal.

EssilorLuxottica has disclosed its water footprint for many years, referring to the withdrawals of different sources of water performed by its operations sites and retail stores. The water withdrawn and managed within the Group's sites and facilities are discharged according to local regulations, with an actual consumption of water along its manufacturing processes that is considered quantitatively not significant. A water consumption, in fact, could occur mainly through its restricted vaporization within the cooling circuits installed in the operations sites, and other minor leakages/evaporation. For this reason, the Group considers the water discharges as practically equal to the withdrawals, continuing to disclose the monitored information on water withdrawals split by source.

	2024	2023 (restated)	2023 (disclosed)
TOTAL WATER WITHDRAWAL *(M^3)*	**11,108,868**	**11,401,007**	**10,780,279**
Third-party water	9,397,726	9,542,984	9,542,984
Natural water	1,711,141	1,858,023	1,237,295
Surface water	2,243	3,248	3,248
Ground water	1,708,898	1,854,775	1,234,047

The 2023 data above reported has been restated to include the Ground Water withdrawals for geothermal purposes. This specific withdrawals are also reported in 2024 and have been considerably reduced, leading to an overall decrease in the Group's water withdrawal compared to last year despite the addition of new Operations sites recently built, whose activity ramped up in 2024. As mentioned above, the water withdrawn in the manufacturing processes is almost entirely discharged taking care of its reintroduction in nature or grid. For additional information on the methodology of data collection and estimation please refer to the Methodology Note in Section 5 *Methodology Note*.

As with climate change, EssilorLuxottica responds to the increasing demand for environmental transparency and in 2024 submitted the Carbon Disclosure Project (CDP) Water questionnaire, receiving a 'B' score.

In 2024, EssilorLuxottica's water intensity per euro of revenue amounted to 0.42 litre/€. The revenue used to calculate the water intensity ratio is €26,508 million as mentioned in the financial statement in Chapter 5, Section 5.1.1 *Consolidated Statement of Profit or Loss* of the 2024 Universal Registration Document

2.4 ESRS E5 – Resource Use and Circular Economy

2.4.1 Introduction

EssilorLuxottica's climate commitment is deeply intertwined with its circularity goals along its own operations and the value chain, leveraging its sustainable innovation expertise across its materials, processes, products and services. One of the most important drivers of EssilorLuxottica's sustainability efforts is the idea that sustainability, products and services go hand-in-hand, right from the development phase. Aligned with its Eyes on Circularity pillar of the Eyes on the Planet sustainability program, the Company's efforts focus on optimizing the use of resources while ensuring high product standards, with the objective to shift from fossil-based materials to bio-based and/or recycled materials and embed eco-design in all its innovation developments by end of 2025. The Group is also taking steps to reduce the production of waste at each step of its value chain.

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

2.4.2 Material Impacts, Risks and Opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Circular Sources, Products and Services	Use of raw material and natural resources	Excessive extraction and inefficient use of key resources (such as fossil based materials, metal) can lead to the depletion of finite natural reserves, contributing to environmental degradation.	• Global Environment, Health & Safety Policy • Business Partners' Code of Conduct • Sustainable Packaging Guidelines • Sustainable Point of Purchase (POP) Guidelines • Waste Policy • Material Recycling Policy	• Shift from fossil-based materials to biobased and/or recycled materials • Embed eco-design in all innovation developments by 2025
	Developing alternative materials (to the benefit of the entire industry)	Embracing advanced technologies (e.g., alternative materials, reuse, increasing renewable and recycled content) to reduce reliance on traditional, finite resources can support the Company's positioning as a pioneer in sustainable innovation. This shift allows the company to explore and adopt new, alternative materials that minimize environmental impact, increase production efficiencies and savings, and align with evolving consumer demand for more responsible products, ultimately affecting the broader industry, as these innovations can set new standards for sustainability and resource efficiency.		
	Risk of limited access to certain raw materials (scarcity, stringent regulations)	Growing global demand for key resources has heightened scarcity, driving up costs and complicating procurement processes. Additionally, evolving environmental regulations aimed at protecting natural ecosystems impose stricter requirements, limiting access to raw materials and increasing compliance costs. These challenges can lead to production delays, rising operational expenses, and diminished competitiveness.		
	Risk of not answering product and services sustainability expectations	Failure to meet sustainability expectations, that entails reducing resource outflows by designing products for longevity, recyclability, and reusability can lead to increased reputational damage, as consumers increasingly prefer environmentally responsible products, leading to loss of market share and reduced revenue.		
Waste Management	Waste Generation	Damages related to environmental degradation (environmental pollution and reduction of ecosystem services) due to improper waste management (e.g., dispersal or abandonment of waste).		• Increase the waste valorization rate by 10 points in the next five years compared to 2024
	Risk of lack of compliance with waste regulation	Improper management of waste poses risks for organizations, including increased costs and reputational damage. Non-compliance with environmental regulations can lead to fines and penalties.		

2.4.3 Policies

EssilorLuxottica is at the forefront of innovation and its sustainability expertise embraces the Group's products and services to meet the Company's environmental commitments without compromising excellence and quality. Resource use and circular economy topics are incorporated in several existing policies and guidelines, listed below, whereas the Group's circular economy policy will be developed in due course.

Document	Main content	Function	Scope	Availability
Environment, Health & Safety Policy	It articulates EssilorLuxottica's commitment to eliminate or minimize all possible impacts on the Environment and on the Health & Safety deriving from its operations, products and stores and lays out guiding efforts, such as: • promoting the development of sustainable products incorporating Environment, Health & Safety topics along the value chain eliminate or reduce the use of substances that are potentially hazardous for the people and the environment, promoting the use of suitable alternatives; • minimizing the environmental impact of its operations, products and services, by using natural resources (such as water) and raw materials rationally; • reducing the production of waste by facilitating reuse and recycling of materials.	EHS	Own operations	Public
Business Partners' Code of Conduct	It sets out the Group expectations toward its Business Partners in terms of, among others, environment by addressing climate change, managing responsibly natural resources, protecting local biodiversity, preventing pollution and deforestation. More specifically, EssilorLuxottica seeks Business Partners to optimize the use of resources to lower its product environmental footprint across the supply chain.	Compliance/ Procurement (Responsible Sourcing)	Upstream and downstream	Public
Sustainable Packaging Guidelines	It sets the Group's commitment to incorporate a 'design for sustainability' concept in the ideation phase. This mainly consists in the elimination of unnecessary layers and creation of new concepts, such as 'easy to disassemble' and 'foldable design' to optimize space needed for shipments, and end-of-life management for packaging components. It also states that the choice of materials should be oriented toward renewable and/or recycled sources (i.e., responsible sourcing of materials).	Product & Operations Sustainability	Upstream and own operations	Internal
Sustainable Point of Purchase (POP) Guidelines	It gives guidelines for new POP development, such as: • incorporating a 'design for sustainability' concept and responsible sourcing of materials, same as packaging guidelines; • selecting manufacturing suppliers that are resources and energy efficient; • considering efficient transportation, with network optimization and modal shift.	Product & Operations Sustainability	Upstream and own operations	Internal

Document	Main content	Function	Scope	Availability
Waste Policy	The objective of this document is to regulate management methods and parties involved in relation to waste management, including: • Guidelines and key principles for managing and prioritizing waste streams safely, in accordance with environmental, legal, and technical responsibilities, from point of generation to end treatment, for EssilorLuxottica sites; • Requirements for proper storage, identification, transportation, treatment by waste service providers, audits and traceability.	EHS	Upstream and own operations	Internal
Material Recycling Policy	The objective of this document is to regulate management methods and parties involved in relation to material recycling, including: • Guidelines and key principles to assess a material recycling solution, externalized with a third party, for EHS teams, sourcing entities or any people or entities within EssilorLuxottica, involved in the definition and launch of a new material recycling solution or a new material recycling stream; • Orientation to efficiently design an acceptable recycling stream and list some limitations.	EHS	Upstream and own operations	Internal

A cross-functional task force, including Product & Operations Sustainability, Procurement, Risk Management, EHS, Logistics, Supply Chain and Corporate Sustainability 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 are in place with R&D to synergize and review tests of responsible materials, with Point of Purchase (POP) to review projects and their application of guidelines and a new working group dedicated to single use plastic has been initiated.

2.4.4 Key Products and Materials

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

- Eyewear: Optical and sun frames of both house and licensed brands. From an R&D perspective, every frame is the result of an ongoing process that anticipates and interprets the needs, desires and aspirations of consumers, while embracing a commitment to eco-design and exiting fossil dependence. The three main technologies are acetate, injected and metal, which in 2024 accounted respectively for 27%, 46% and 27% of frames. To pursue the goal of switching from fossil to bio-based and/or recycled sources in line with its sustainability commitment, EssilorLuxottica has been introducing bio-based and recycled materials, including those coming from internal recycling opportunities.

  In 2024, the Group further expanded the permeation of responsible materials in its eyewear collections and, as a result, 28% of active assortment is made with responsible materials for frames and plano lenses. Considering only collections launched in 2024 such permeation goes up to 43%.
- Lenses: EssilorLuxottica produces lenses that are finished and semi-finished or plano. In general, finished lenses are produced for simple eyesight corrections such as myopia, hyperopia and some astigmatisms. Semi-finished lenses are intended for more complex corrections including presbyopia, while plano lenses without corrective power are typically used for sunglasses. Circularity approach is different between plano lenses and prescription lenses:
  - Plano lenses: plastic and mineral lenses for sun application. The circularity approach focuses on introducing bio-based and or recycled materials. Responsible materials for lenses include: bio-based nylon and bio-circular polycarbonate.
  - Prescription lenses: as a medical device, the inclusion of bio-based and/or recycled materials requires significant developments. For this reason, as of now, circularity focus is on the production process, specifically on waste reduction initiatives.

- Eyeglass cases and accessories: the acquisition of Giorgio Fedon & Figli S.p.A represented a step forward in EssilorLuxottica's vertical integration strategy, as well as an important asset for the Group to pursue its sustainability commitment. It allowed the Company to invest in the circularity of its packaging materials, mostly represented by paper and synthetic fabrics, with the progressive elimination or conversion of single-use plastic elements and alternative material explorations. The Group established a dedicated team of designers and researchers working at its Innovation Center in Alpago (Italy), where research activities in eco-design, innovative manufacturing technologies, new concept engineering and feature integration are carried out to offer all industry players and consumers accessories synonymous with exclusivity, refined elegance, environmental attention and best user experience. 78% of new packaging kits introduced in 2024 have been developed according to packaging sustainability guidelines. More specifically, levers implemented were: use of certified recycled materials, single use plastic limitation, weight reduction and foldable solutions.

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

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

For more information regarding the Group's products, please refer to Chapter 1 of the 2024 Universal Registration Document.

2.4.5 Actions and Resources

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

Materials

Materials for eyewear, plano and demo lenses application

Over the last few years, bio-based and recycled materials have been introduced into EssilorLuxottica's portfolio of plastic raw materials for eyewear frames and lenses applications.

In 2024, the Group further increased permeation of alternative materials compared to traditional ones, notably introducing bio and/or recycled acetate, bio and recycled nylon in the acetate and injected frame manufacturing technologies respectively and bio-nylon and bio-circular polycarbonate for plano lenses. In 2024 the Group launched a pilot project to introduce the first demo lenses made with Recycled Polymethyl Methacrylate (RPMMA) having a recycled content of over 80%. As a result, considering plastic materials for frames and lenses, alternative materials represented 29% of total sourced materials.

Further steps have been done on metal technology; in 2024 the Company worked both with its suppliers of raw precious metals, used for plating treatments, and its suppliers of plated metals components, to ensure that any precious solution is 100% derived from recycled and certified sources. In 2024 the Company engaged its suppliers of raw precious metals, covering 75% of purchasing spending in Italy and China, and its suppliers of plated metals components covering 97% (China and Italy). The Company is also working with its non-precious metals suppliers, asking them to transparently declare and attest recycled content inside different metals alloys, according to ISO 14021, aiming at a continuous monitoring and improvements of recycled content over years.

Materials for packaging application

In line with internal sustainability packaging guidelines a focus has been placed on the recycled version of paper and synthetic fabrics. Focusing on these materials, in 2024 Fedon's plants in Shenzhen (China) and Alpago (Italy) have been awarded the Global Recycled Standard Certification (GRS) for fabrics; additionally, Forest Stewardship Council (FSC) certification for paper has been extended also to Fedon's plant in China (already gained for Italy and Romania). These certifications underscore Fedon's commitment to responsible sourcing and manufacturing, allowing the brand to offer certified accessories that uphold high social and environmental standards as well as trace and attest recycled content inside its products.

Materials for Point of Purchase application

In 2024, a comprehensive assessment was conducted on Point of Purchase (POP), permanent and seasonal tools for wholesale and permanent ones for retail, collecting data related to more than 1.2 million units per year representing around 99% of total units.

Following the issuance of POP sustainability guidelines, PVC has been reduced to less than 1% of all tools managed, certified paper was used for over 99% of all seasonal tools, and recycled materials were applied on over 70% of all permanent tools.

Single Use Plastic

With reference to single use plastic, the Group is constantly working to play its part on limiting the amount of plastic designed and conceived to be used only one time for a specific purpose. In this context, in 2024 the following priorities have been set to limit and gradually avoid the consumption of single use plastic items in the Group:

- creating a solid and clear definition of single use plastic based on existing regulations. EssilorLuxottica, in line with current regulations, defines as single use plastic the items made of plastic, specifically placed on the market to be used once and for the purpose of which it was designed, thus not intended for repeated use and lacking of durability to be repurposed;
- structuring a specific governance to manage the topic. Several internal departments are involved on the assessment of single use plastic in use in the Group and on the identification of initiatives to reduce it;
- defining the methodology for assessing single-use plastic usage over the years. The Company identified three main streams considered as single use:
  - B2C, Packaging & other products that constitutes a sales unit designed/conceived for the final user or consumer at the point of retail,
  - B2B, packaging for materials, components, partially manufactured or finished goods and other products intended for distribution and handling from manufacturer to manufacturer and/or other intermediaries,
  - internal consumption, packaging & other products received from suppliers intended exclusively for internal company use in environments like plants, point of sales, offices, common areas, service spaces;
- setting priorities and strategies for single-use plastic reduction. EssilorLuxottica distinguish different levers to tackle single use plastic items. The first priority is given to the potential elimination of the item considered as single use, while the other levers refer to the reusability of the item or its replacement with alternative materials. Moreover, the Company recognize the importance of acting primarily on B2C single use plastic items to relieve their disposal management by final consumers.

In 2024, following the above-mentioned activities carried out, a Group-level assessment was conducted on single-use plastic items, with a focus on the single-use plastic packaging.

Since years EssilorLuxottica is working on the deployment of actions to reduce single-use plastic packaging related to some product categories. Focusing on B2C stream, the Group is advancing on eyewear packaging with the following initiatives: the replacement of plastic sleeves protecting frames temples with a paper alternative; the transition from plastic bags and cloth envelopes to paper ones; and the elimination of plastic sun lens stickers. In the packaging of Apparel, Footwear, and Accessories for the Oakley and Costa brands, nearly all plastic bags have been replaced with paper alternatives. Moreover, on logistic packaging many initiatives targeting plastic reduction have been implemented (like the plastic void fill and plastic tape substitution with a paper alternative).

All these actions contributed to a reduction of more than 150 tons of Single Use Plastic packaging compared to the previous year.

The Company is constantly working on the identification of new initiatives to reduce the usage of single use plastic items on all the streams to play its role on tackling this important environmental issue.

Application of circular design

EssilorLuxottica aims to create circular products from the very start of the innovation process using eco-design principles. This approach and Life Cycle Assessments (LCAs) are part of the Company's wider vision of how to integrate sustainability into business and operational practices. The Group developed in 2021 a proprietary eco-design tool, Sustainability Assessment Methodology (SAM), for its lens division, whose main pillars were circularity capability, resources, and process efficiency along with low-impact raw materials to support R&D teams in having an assessment while designing new products/technologies. With the ambition of continuously learning and improving, EssilorLuxottica has introduced in 2024 along with the first version (SAM1.0) a new proprietary tool (SAM2.0) to strengthen the quantitative assessment of environmental and social impact aligned with the Product Environmental Footprint (PEF) methodology. Also, SAM2.0 has been extended in terms of perimeter of analysis to frames. In 2024, within the scope of eyewear and lenses, 22% of innovation projects launched on the market were assessed either with SAM1.0 or SAM2.0.

To strengthen sustainability and eco-design assessment of new products and R&D activities, EssilorLuxottica is also focusing on bringing transparency and clarity across its entire supply chain. Quantitative impact assessment is the backbone of Group sustainability and eco-design assessment, thus for this reason, the Company invested in LCAs with its partners, pursuant to ISO 14040 and ISO 14044 international standards, to quantify environmental impact of the most used upstream materials for frames, lenses and packaging.

Circular business practices

Circular processes

The Company continues carrying on projects to valorize its internal material waste. The Tristar plant in China and Agordo plant in Italy have been recycling nylon plastic scraps (since 2023 and 2022 respectively) derived from the injection manufacturing of frames into black raw nylon. At the same time, Campinas plant in Brazil is recycling nylon, through an external partner. All plants involved in the process achieved the International Sustainability & Carbon Certification (ISCC) Plus for the Circular Economy covering 2024-2025. The third-party certification ensures, through the mass balance approach, the traceability of the material throughout all production phases: from waste collection to injection molding. The recycled granule maintains the high standards of quality and performance of the original and this makes it suitable to be injected again to produce new frames. In 2024, together the plants, have recycled more than 95 tons of nylon. New tests are being carried out to extend recycling to other nylon grades for the next year.

In 2024, a new project has been launched aiming at increasing new recycling opportunities. The Group leveraged on additional nylon waste, accurately sorted and collected in the Agordo plant, transforming it thanks to an external partner and creating a plastic display for in-store purposes. In 2024 more than 4 tons of nylon scraps have been recycled, producing more than 20,000 displays that have been distributed across EssilorLuxottica's stores in EMEA, both mono-brand (Ray-Ban stores and Oakley stores) and retail (Sunglasshut, Solaris, Salmoiraghi & Viganò and Grand Vision). This initiative is part of a broader in-store sustainability roadmap that includes major investments in its brick-and-mortar activities related to energy efficiency, building less and better, circularity in the use of materials, waste management and the implementation of a three-year plan from 2023 aimed at obtaining WELL certification for 400 Salmoiraghi & Viganò, LensCrafters and Sunglass Hut stores in Europe and the US, starting from Salmoiraghi & Viganò in Italy. In 2024, 100 stores applied for the certification and, among those, one Salmoiraghi & Viganò store gained the WELL certification at gold level.

Circular Services

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

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

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

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

Indeed, between June and October 2023, Ray-Ban launched a brand specific initiative, the 'Repair & Care Hub'. The in-store available service encouraged customers to take care of their eyewear products by entrusting them to repair experts. It started as an itinerant corner that became permanent in 2024 in 11 key stores in EMEA and 1 store in US. Overall, more than 3.850 customers used the Ray-Ban service in 2024.

Similarly, in April 2024, Salmoiraghi & Viganò launched 'Officina Rinnovo'. This model area was designed to test Repair & Renewal Service in a multibrand banner for the first time. 'Officina Rinnovo' was piloted in two stores in Milan, for three weeks per stores, with dedicated services supported by technicians from EssilorLuxottica plants. Salmoiraghi & Viganò has also won the Retail Awards 2024 in the category Best ESG & Sustainability Project with this project.

In 2025, the Group will further expand the Ray-Ban 'Repair & Care Hub' in additional stores and will assess the permanent availability of the 'Officina Rinnovo' service.

The second lever is second life activation. It consists in collecting post-consumer products in store for reusing or recycling the materials they are made of. Since April 2023, Salmoiraghi & Viganò has offered consumers the opportunity to bring unused sunglasses and prescription glasses from any brand back to the store, free of charge. The Company takes responsibility for the revaluation of materials or donates them for educational purposes in the optometry field. This service is now available in all Salmoiraghi & Viganò stores. In April 2024, the project was also expanded to GrandVision Italy. Similarly, in France, since the end of April 2024, the service was offered through independent opticians with a first pilot. The objective is to leverage these pilot initiatives to evaluate the extension of the service and reach a larger number of consumers.

In addition, the Synoptik retail banner launched the 'Vision as a Service' spectacle subscription program in Denmark and Sweden in 2019. To maximize the product lifetime of returned spectacles from this service, the banner launched the PreLoved concept in 2022 by which spectacles are sold second-hand. Additionally, from November 2024, returned spectacles that are not sellable under PreLoved, are either used for educational purposes at optometry schools or disassembled into plastic, metal, and glass components.

To manage eyewear end-of-life at scale, the Company is also building a dedicated area inside the plant in Rovereto (Italy), to be equipped with machinery programmed to properly disassemble eyewear frames, identify materials and recycle them. This investment is the result of two years of research of innovative technologies to be able to manage the variety in terms of types of materials and product shapes. The plant has applied to obtain the environmental authorizations for waste management and transformation. This is an important step to integrate eyewear products' end of life management, increasing knowledge and expertise in this field.

Collaborations

EssilorLuxottica internal experts are also engaging with an entire ecosystem of companies, start-ups, think tanks, academic institutions and government bodies to build innovative solutions that require collaborative actions. For example, EssilorLuxottica, along with other multinationals, jointly launched the first international research chair devoted to circular economy at ESSEC Business School, called the 'Global Circular Economy Chair' in 2021. With the aim of training future circular economy leaders, the Chair mainly focuses on launching experimental collaborative projects, raising awareness on the circular economy and producing fundamental research to accelerate the transition toward a circular economy.

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

Furthermore, R&D and Engineering teams are always looking to extend their supply sources of secondary or innovative raw materials by working with multiple industries, thus reducing the use of virgin or fossil-based materials. Multiple projects are currently being developed with suppliers. For example, also in 2024, EssilorLuxottica partnered with Bureo to offer to market the Costa Del Mar Untangled collection with frames made with 97% to 100% NetPlus® recycled fishing nets. Discarded fishing nets are collected from commercial fishing ports in South America and Bureo recycles the nets into raw material pellet form called NetPlus®. The recycled raw material is then used to produce recycled frames by EssilorLuxottica, combining them with mineral glass lenses, avoiding the use of new plastic materials and providing superior lens clarity and durability.

Waste

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

The Company completed a waste generation analysis of its main manufacturing plants, distribution centers, and laboratories to determine the type and weight of waste generated and improve the identification of waste management solutions with a focus on the potential for material recycling and energy recovery. It is updated annually and was extended to new plants in 2024 (53 sites covering nearly half of Rx lenses and more than 60% of mass production lens volumes). Frames manufacturing plants integration in the mapping has started in 2024 and is on-going.

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

Waste type	%	Description	Main waste treatment
Liquid waste	33%	Mostly wastewater, solvent, acid and base from manufacturing processes	Physico-chemical treatments
Plastic	28%	Mostly scrap lenses, process residues, packaging and films plastics	Energy recovery or recycling
Others	25%	Mostly general industrial waste, absorbents, filter materials, drums, sludge and personal protective equipment	All treatment types align with the Group's Policies
Cardboard	11%	Mostly consumable packaging and semi-finished packaging	Recycling
Metal	3%	Mostly process losses and alloys	Recycling

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

- the Slim Fit project for lenses production aims to decrease input material that, consequently, reduces waste generation during the lens production process. To achieve this goal, the design for standard raw blank lenses has been optimized to obtain the same final high-quality lens. The rollout of the Slim Fit project in the Group's biggest Rx labs around the world has accelerated, allowing to avoid more than 2100 tons of waste in 2024;
- continuous process optimization has led the Company to scale compacting for the surfacing residues of all substrates. This reduces the weight and volume of waste (less picking rotation, with an impact on CO_2e), and recycles water. Water is then filtered and reinjected into the prescription laboratory's in-house system, following a circular approach. Three new equipment items were added in 2024;
- additional waste management initiatives are also ongoing with partners like Mazzucchelli and several recycling initiatives are taking place locally, including one in Mexico, contributing to the economic development of local communities. In 2024, the SOFI plant sent 55 tons of waste, mostly made of plastics (production consumables) to a small recycling company, employing local communities. They turn that waste into ready-to-use raw materials, sold to other companies in the country, producing final items like sandals, crates or insulating materials. Part of the revenues supports the activity of the Index association, which helps local workers and their families, in educational and health programs (access to medicine, kindergarten, dental care, etc.);
- specifically concerning plastic recycling, the Company has been investigating different options to recycle the swarf resulting from the surfacing of Rx lenses. Some studies are on going with third parties and the University Research Center to identify a solid process for recycling, to allow more options for circular applications;
- in 2022, EssilorLuxottica launched its first waste expertise training session, for employees who contribute to reducing the Group's waste footprint. Following this successful pilot, waste training was deployed in North America for all relevant activities. A Waste & Circularity category in the Group internal 'Operation Best Practices Portal' has been created in 2024.

EssilorLuxottica's manufacturing flexibility and improved demand forecasting capabilities are also key to the reduction of waste in its plants. Over the years, it has introduced a retro-planning approach for the creation and launch of each eyewear collection, allowing it to better plan production volumes and avoid manufacturing more units than needed.

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

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

2.4.6 Targets and Metrics

As recalled in the Eyes on Circularity pillar of the Company's Eyes on the Planet sustainability program launched in 2021, EssilorLuxottica's goal is to shift from fossil-based materials to bio-based and/or recycled materials and embed eco-design in all its innovation developments by 2025. To do so, different areas of intervention and associated targets have been defined or are being defined, as explained below.

The objective of 'Shifting from fossil-based materials to bio-based and/or recycled materials', is global and mostly pertains to the upstream part of the Company's value chain related to sourcing alternative materials and to operations for the recycling of industrial scraps. From a category standpoint, this target refers to the eyewear and plano lenses category where it is possible to introduce bio-based and/or recycled materials always guaranteeing the same excellence and quality as well as the best vision experience. With regard to prescription lenses, being a medical device, it is quite challenging to include bio-based and/or recycled materials. For this reason, for prescription lenses the circularity focus is on the production process. In 2024, 22% of bio-materials and 7% of recycled materials were sourced in the plastic category of materials for frames, plano and demo lenses.

With reference to the target of embedding eco-design, EssilorLuxottica's objective is to conduct quantitative assessments of 100% of new product innovations that will be brought to market in its core business, namely prescription lenses and eyewear, by 2025. Innovation teams will rely on the Sustainability Assessment Methodology (SAM) tool. This process enables decision-making and direction-setting from the design phase to reduce the environmental and societal impact of products. This approach is part of a circular improvement framework for quantifying impacts and identifying possible levers toward increased circularity for materials, processes or value chain, as well as new areas for progress. Among these areas of progress, assessing the impacts of materials used in its products from the ideation stage allows the Group to guide its choices toward more responsible materials that strike the best balance between social and environmental impacts for its consumers and populations of countries in which EssilorLuxottica operates. In 2024, within the SAM scope, 22% of eyewear and lens innovation projects were assessed.

Regarding waste, EssilorLuxottica has quantified a waste valorization target, calculated as the proportion of waste that is being sent to waste service suppliers for their final treatment, either for energy recovery or material recycling streams. This objective encourages local entities to search for new ways of treatment but also decreases the quantity of waste which is being sent to non-valorization streams, including landfill or incineration without energy recovery. The target is to increase this valorization rate by 10 points from 2024 baseline over the next five years. The increase in the valorization rate helps to contribute to lower the use of fossil resources, when waste is used as alternative combustible to fuel or gas (e.g., swarf sent to cement factories) or recycled (e.g., polycarbonate lens scrap in mass production). The Group is also monitoring the grams of waste per good unit produced metric, with a target of continuous improvement YoY.

The table below shows the Company's waste generation in 2024 and the evolution compared with 2023.

Waste

	2024	2023
TOTAL WASTE GENERATED	**142,160**	**139,121**
TOTAL AMOUNT OF HAZARDOUS WASTE	**47,284**	**53,612**
Hazardous waste diverted from disposal	**16,851**	22,017
Hazardous waste diverted from disposal due to preparation for reuse	-	-
Hazardous waste diverted from disposal due to recycling	11,469	15,003
Hazardous waste diverted from disposal due to other recovery operations	5,381	7,014
Hazardous waste directed to disposal	**30,433**	31,594
Hazardous waste directed to disposal by incineration	3,601	3,020
Hazardous waste directed to disposal by landfilling	26,833	28,574
Hazardous waste directed to disposal by other disposal operations	-	-
TOTAL AMOUNT OF RADIOACTIVE WASTE	-	-
TOTAL AMOUNT OF NON HAZARDOUS WASTE	**94,876**	**85,509**
Non-hazardous waste diverted from disposal	**72,444**	66,304
Non-hazardous waste diverted from disposal due to preparation for reuse	-	-
Non-hazardous waste diverted from disposal due to recycling	45,928	43,805
Non-hazardous waste diverted from disposal due to other recovery operations	26,516	22,499
Non-hazardous waste directed to disposal	**22,432**	19,205
Non-hazardous waste directed to disposal by incineration	2,628	3,592
Non-hazardous waste directed to disposal by landfilling	19,804	15,613
Non-hazardous waste directed to disposal by other disposal operations	-	-
WASTE VALORIZED	**89,295**	**88,321**
Waste valorization rate	63%	63%
NON-RECYCLED WASTE	**84,762**	**80,312**
Non-recycled waste rate	60%	58%

In 2024 the total waste generated by the Group is in line with the previous year, despite of the integration in the reporting of new Operations sites recently built and that ramped up in 2024. In 2024, the Company focused its efforts on the reduction of Hazardous Waste, with a notable result compared to the previous year. The Group is committed to reducing the environmental impact of the waste generated and to increase the waste valorization rate, confirmed at 63% in the reporting year. For additional information on the methodology of data collection and estimation please refer to the Methodology Note in Section 5 *Methodology Note*.

The table below shows the Company's progress on other circularity metrics in 2024:

Other metrics	Progress
The rates of recyclable content in products	25%
The rates of recyclable content in product packaging	A packaging recyclability assessment will be carried out in due course with a methodology aligned with the upcoming European regulation PPWR, which sets European standards on this matter.

2.5 EU Taxonomy Disclosure

Context of EU Taxonomy

The EU Taxonomy Regulation is part of the European Commission's overall efforts to reach the European Green Deal objectives and make Europe climate-neutral by 2050.

Published on June 22, 2020 in the Official Journal of the European Union and entering into force on July 12, 2020, Regulation (EU) no. 2020/852 – EU Taxonomy Regulation (hereinafter also referred to as the 'Taxonomy' or 'Regulation') and FAQ published in December 2024 provide a classification system for defining economic activities that can be considered environmentally sustainable, to support investment flows in a more sustainable economy.

According to the Regulation, to be eligible or qualify as a potentially sustainable activity, an economic activity needs to be listed in the Delegated Act of the Regulation, contributing to at least one of the below six environmental objectives defined by Article 9 of the Regulation itself:

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

To ascertain if an eligible activity is Taxonomy-aligned, the following Technical Screening Criteria must be met:

- compliance with the substantial contribution criteria to one environmental objective with reference to each economic activity identified;
- Do No Significant Harm (DNSH), i.e., avoiding negative effects on the other five environmental objectives;
- Respect Minimum Safeguards (MS), recognizing the importance of compliance with international principles and practices covering Human Rights, corruption, taxation and fair competition.

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

Following the official adoption of Article 3 of the Regulation (Criteria for sustainable economic activities), EssilorLuxottica has assessed the eligibility and alignment of its activities with the six environmental objectives that have been officially adopted to date (ref. Climate Delegated Act – Annex I and Annex II): climate change mitigation, climate change adaptation, the use and protection of water and marine resources, transition to a circular economy, prevention and reduction of pollution, and protection and restoration of biodiversity and ecosystems. For the last four objectives, the Group did not identified any eligible projects.

It is worth remembering that for these different objectives, the European Commission has prioritized the establishment of technical screening criteria for economic activities that potentially contribute most to environmental objectives.

The EU Taxonomy disclosure is an integral part of Group CSRD reporting which adopt the European Sustainability Reporting Standards. EU Taxonomy requirements are integrated with CSRD regulations ensuring the consistency of the reporting. Where relevant, the key performance indicators of taxonomy aligned CapEx and CapEx plans are referenced to the Climate change mitigation actions (as required by ESRS Disclosure Requirement E1-3) for the implementation of its transition plans.

EssilorLuxottica's Analysis

The analysis was carried out in compliance with the six environmental objectives, namely: climate change mitigation, climate change adaptation, the use and protection of water and marine resources, transition to a circular economy, prevention and reduction of pollution, and protection and restoration of biodiversity and ecosystems.

With its vertically integrated business model covering the design, manufacture and distribution of ophthalmic lenses, frames and sunglasses (see Section 1.3 *Strategy*), EssilorLuxottica's core economic activities are not described in the current version of the regulation and are therefore not considered 'eligible' nor aligned. Consequently, for 2024 as for 2023, the Group did not generate any eligible or aligned turnover with the EU Taxonomy Regulation.

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

To deploy and achieve its sustainability commitments, the Company has launched several initiatives and projects that can be considered individually as Taxonomy-eligible investments (CapEx) (e.g., photovoltaics, building components, mechanical and electrical equipment like HVAC, energy efficient lighting, charging stations, green vehicles or real estate IFRS 16), following a detailed analysis of the activities and related technical screening criteria listed in the Climate Delegated Act – Annex I and Annex II of the Regulation.

However, it should be noted that the Group launched other energy saving initiatives that are not considered eligible, as these actions are not described in the current version of the Regulation.

Disclosure of Taxonomy KPIs

Turnover KPI

As for 2023, EssilorLuxottica did not generate any turnover in 2024 that could be considered Taxonomy-eligible or Taxonomy-aligned. The Group turnover equals in total €26,508 million (€25,395 for 2023), as presented in the line item Revenue of the consolidated statement of profit or loss (Chapter 5, Section 5.1.1 *Consolidated Statement of Profit or Loss* of the 2024 Universal Registration Document).

OpEx KPI

With regards to the OpEx KPI, the Group calculated a value for the denominator equal to €665 million (€607million for 2023, a difference of 9.6%) following the methodology described in Section 5 *Methodology Note*. From the evaluation of the denominator, results showed that the business model of the Group did not generate significant OpEx for the categories mentioned by the Regulation. Operating expenses under the EU Taxonomy definition (denominator) represent less than 10% of total Group consolidated operating expenses, which include Cost of Sales and Total Operating Expenses as presented in the 2024 consolidated financial statements (Chapter 5 of the 2024 Universal Registration Document, Section 5.1 *Consolidated Financial Statements*). For this reason, and as for 2023, the Group considered the indicator not material.

CapEx KPI

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

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

CapEx related to the above activities are reported under the lines Additions and Business Combinations of the items Properties, Plant & Equipment (activity 7.2, 7.3, 7.4, 7.5, 7.6 and owned buildings of 7.7) and Right-of-Use Assets (activity 6.5 and rented buildings of 7.7) as presented in the 2024 consolidated financial statements (Chapter 5, Section 5.1.6 *Notes to the Consolidated Financial Statements* of the 2024 Universal Registration Document).

These activities represent part of the sustainable initiatives related to production sites, laboratories and stores. Analysis of costs associated with Group properties is based on accounting records used for the preparation of EssilorLuxottica consolidated financial statements/information. Data for directly managed stores was considered on a full scope (due to limited availability of centralized and detailed information for APAC and LATAM regions, the associated eligible CapEx were estimated based on the % weight of total CapEx by region for the activity 7.3 installation, maintenance and repair of energy efficiency equipment). For production sites and laboratories, analysis was performed in 2024 on a full scope for frames sites and all lenses facilities.

Total CapEx of the consolidated financial statement is €3,678 million as reported in Chapter 5 of the 2024 Registration Document, Section 5.1.6 *Notes to the Consolidated Financial Statements*, Note 10 *Goodwill and Other Intangible Assets*, Note 11 *Property, Plant and Equipment*, and Note 12 *Leases*. The analysis of the CapEx KPI resulted to 38.29% (2023: 53.02%) of eligibility and 0.73% (2023: 0.67%) of alignment.

Most of the eligible CapEx derives from the inclusion of costs related to the Right of Use of stores and other buildings. Most of the aligned CapEx is driven by the increase of the renewable energy projects (specifically investment in Barberini), as described in Section 2.1 *ESRS E1 – Climate Change* and 2.1.5 *Actions and Resources*.

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

Compliance with the Minimum Safeguards

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

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

In fact, ethical behavior is one of the main pillars that guide the way EssilorLuxottica conducts business. The Code of Ethics and the Business Partners' Code of Conduct define the principles that apply to all EssilorLuxottica employees, contractors, vendors and suppliers, and represent a minimum set of standards that cannot be compromised, including the respect of Human Rights, labor conditions and fair competition. EssilorLuxottica's suppliers are required to comply with these documents. The Group maintains a very high level of vigilance regarding the respect of Human Rights among its suppliers. In fact, EssilorLuxottica has a proactive approach in compliance with French Law no. 2017-399 (*Devoir de Vigilance*) that requires due diligence on the supply chain to identify risks related to Human Rights (Section 3.2 *ESRS S2 – Workers in the Value Chain*).

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

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

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

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

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

Alignment assessment

Below is a summary of the alignment assessment for each activity identified as eligible.

Activity	Substantial Contribution	DNSH
Transport by motorbikes, passenger cars and light commercial vehicles (6.5)	Part of the EssilorLuxottica's new company vehicles meet the substantial contribution criteria (CO_2e emission rate lower than 50gCO_2e/km)	DNSH criterion on performing a dedicated climate risk assessment was not met for all the sites having cars with CO_2e emission rate lower than 50gCO_2e/km
Renovation of existing buildings (7.2)	Part of the EssilorLuxottica's renovation activities meet the substantial contribution criteria (major renovation and/or reduction in primary energy demand by at least 30%)	DNSH criterion related to water, circular economy and pollution for all the sites are not met.

Activity	Substantial Contribution	DNSH
Installation, maintenance and repair of energy efficiency equipment (7.3)	The activities mainly included installation and replacement of energy efficient light sources, and the installation and maintenance of heating, ventilation and air-conditioning (HVAC). Using the references provided by an expert for Italy and France, some specific equipment was aligned. However, due to a lack of clarity on how to deal with countries outside EU and in a conservative approach, some CaPex could not be considered aligned.	Thee DNSH criteria for this activity requires a Climate Risk Assessment related to the asset on which the activity was performed.
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings) (7.4)	Not applicable for this activity.	All of the projects were implemented on sites that were subject to a physical climate-risk assessment.
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings (7.5)	All the eligible projects (e.g., installation, maintenance and repair of smart meters for gas, heat, cool and electricity) met the substantial contribution criterion.	All of the projects were implemented on sites that were subject to a physical climate-risk assessment.
Installation, maintenance and repair of renewable energy technologies (7.6)	All the eligible projects (e.g., installation, maintenance and repair of solar photovoltaic systems and the ancillary technical equipment; installation, maintenance and repair of thermal or electric energy storage) met the substantial contribution criterion.	The DNSH criteria for this activity required a Climate Risk Assessment related to the asset on which the activity was performed.
Acquisition and ownership of buildings (7.7)[(a)]	The construction of new buildings in production sites located in relevant regions have been considered an eligible activity. The construction of buildings by EssilorLuxottica Group always follows the highest standards of sustainability with the aim of reducing the Group's emission profile. However, due to limited documentation to perfectly match the certification criteria with taxonomy's, the activity was considered not aligned following a conservative approach. Regarding the leasing of new stores, the alignment was limited due to insufficient documentation for substantial contribution criteria, especially for stores in regions outside of EU where the criteria might have different legislation not stipulated in the EU Taxonomy, thus a conservative approach was taken.	For new buildings meeting the Substantial contribution criteria, EssilorLuxottica could not assess some of the elements required to justify compliance with all the DNSH criteria. For the lease of stores, the projects were subject to a physical climate-risk assessment and adaptation plan toward the climate risks assessed.

(a) New building construction activities have been classified in this activity. The associate technical criteria of these projects have been analyzed as per the 7.1 activity.

EssilorLuxottica acknowledges the challenges of aligning retail and lease activities with Taxonomy technical specifications, particularly due to the diverse nature of the retail businesses located within larger mall environments. Despite this, the Company is committed to continuously improving its alignment with Taxonomy standards and will actively work toward integrating more projects and initiatives into alignment frameworks in the future.

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

Based on the assessment above, the following table shows the CapEx KPIs, with a proportion of CapEx from products or services associated with economic activities that qualify as environmentally sustainable under Articles 3 and 9 of the Taxonomy Regulation – disclosure covering FY 2024.

Financial year N		2024		Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	CapEx (3) *(€ millions)*	Proportion of CapEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Transport by motorbikes, passenger cars and commercial vehicles	CCM 6.5	0.38	0.01%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	-%		T
Transport by motorbikes, passenger cars and commercial vehicles	CCM 6.5 and CCA 6.5	-	-%	Y	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.06%		T
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0.44	0.01%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.01%	E	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3 and CCA 7.3	-	-%	Y	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.07%	E	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	0.19	0.01%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	-%	E	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4 and CCA 7.4	-	-%	Y	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.01%	E	
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	0.22	0.01%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	-%	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	24.72	0.67%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.01%	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6 and CCA 7.6	-	-%	Y	Y	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.51%	E	
Acquisition and ownership of buildings	CCM 7.7	0.99	0.03%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	-%		

Financial year N		2024		Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	CapEx (3) (€ millions)	Proportion of CapEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
CAPEX OF ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY-ALIGNED) (A.1)		**26.94**	**0.73%**	**0.73%**	**-%**	**-%**	**-%**	**-%**	**-%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**	**0.67%**		
Of which Enabling		*25.56*	*0.69%*	*0.69%*	*-%*	*-%*	*-%*	*-%*	*-%*	*Y*	*Y*	*Y*	*Y*	*Y*	*Y*	*Y*	*0.61%*	*E*	
Of which Transitional		*0.38*	*0.01%*	*0.01%*						*Y*	*Y*	*Y*	*Y*	*Y*	*Y*	*Y*	*0.06%*		*T*
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Transport by motorbikes, passenger cars and commercial vehicles	CCM 6.5	12.39	0.34%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.54%		
Renovation of existing buildings	CCM 7.2	9.61	0.26%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-%		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	34.65	0.94%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.45%		
Acquisition and ownership of buildings	CCM 7.7	1,325	36.02%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								50.37%		
CAPEX OF TAXONOMY-ELIGIBLE BUT NOT ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (NOT TAXONOMY-ALIGNED ACTIVITIES) (A.2)		**1,382**	**37.56%**	**37.56%**	**-%**	**-%**	**-%**	**-%**	**-%**								**52.36%**		
A. CapEx OF TAXONOMY ELIGIBLE ACTIVITIES (A.1+A.2)		**1,408**	**38.29%**	**38.29%**	**-%**	**-%**	**-%**	**-%**	**-%**								**53.02%**		
B. Taxonomy-non-eligible activities																			
CapEx of Taxonomy-non-eligible activities		2,270	61.71%																
TOTAL		**3,678**	**100.00%**																

Row		
Nuclear energy-related activities		
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas-related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Revenues Table

The table below shows the proportion of turnover from products or services associated with economic activities that qualify as environmentally sustainable under Articles 3 and 9 of the Taxonomy Regulation.

EssilorLuxottica did not generate turnover for 2024 that could be considered Taxonomy-eligible or Taxonomy-aligned.

Financial year N		2024		Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	Turnover (3) (€ millions)	Proportion of Turnover, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) turnover, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		-	-%	-%	-%	-%	-%	-%	-%	N	N	N	N	N	N	N	-%		
Of which Enabling		-	-%	-%	-%	-%	-%	-%	-%	*N*	*N*	*N*	*N*	*N*	*N*	*N*	-%	*E*	
Of which Transitional		-	-%	-%						*N*	*N*	*N*	*N*	*N*	*N*	*N*	-%		*T*
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		-	-%	-%	-%	-%	-%	-%	-%								-%		
A. TURNOVER OF TAXONOMY ELIGIBLE ACTIVITIES (A.1+A.2)		**-**	**-%**	**-%**	**-%**	**-%**	**-%**	**-%**	**-%**								**-%**		
B. Taxonomy-non-eligible activities																			
TURNOVER OF TAXONOMY-NON-ELIGIBLE ACTIVITIES		**26,508**	**100%**																
TOTAL		26,508	100%																

OpEx Table

The table below shows the proportion of OpEx from products or services associated with economic activities that qualify as environmentally sustainable under Articles 3 and 9 of the Taxonomy Regulation.

Operating expenses under the EU Taxonomy definition (denominator) represent less than 10% of Group total consolidated operating expenses, which include Cost of Sales and Total Operating Expenses as presented in the consolidated statement of profit or loss (see Chapter 5 of the 2024 Universal Registration Document, Section 5.1 *Consolidated Financial Statements*) and, as a result, the Group considered the indicator not material.

Financial year N		2024		Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm')									
Economic Activities (1)	Code (2)	OpEx (3) *(€ millions)*	Proportion of OpEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, year N-1 (18)	Category enabling activity (19)	Category transitional activity (20)
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		-	-%	-%	-%	-%	-%	-%	-%	N	N	N	N	N	N	N	-%		
Of which Enabling		-	-%	-%	-%	-%	-%	-%	-%	*N*	*N*	*N*	*N*	*N*	*N*	*N*	-%	*E*	
Of which Transitional		-	-%	-%						*N*	*N*	*N*	*N*	*N*	*N*	*N*	-%		*T*
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		-	-%	-%	-%	-%	-%	-%	-%								-%		
A. OPEX OF TAXONOMY ELIGIBLE ACTIVITIES (A.1+A.2)		**-**	**-%**	**-%**	**-%**	**-%**	**-%**	**-%**	**-%**								**-%**		
B. Taxonomy-non-eligible activities																			
OPEX OF TAXONOMY-NON-ELIGIBLE ACTIVITIES		**665**	**100%**																
TOTAL		**665**	**100%**																

3 Social Information

3.1 ESRS S1 – The Company's Workforce

3.1.1 Introduction

EssilorLuxottica's success is deeply rooted in the dedication of its global team of over 195,000 employees, who deliver products of exceptional technical and stylistic quality alongside unmatched levels of service. This worldwide community embodies a distinctive expertise and DNA, aligning with the Company's Mission to help people 'see more and be more'.

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

In 2024, EssilorLuxottica reaffirmed its commitment to fostering a thriving, inclusive, and innovative workplace, aligning its people-centered approach with its Mission and business strategy. A key milestone was the launch of the Group Values initiative, which united employees worldwide under a shared culture, strengthening engagement and fostering a sense of purpose. The year also marked significant progress in Diversity, Equity, and Inclusion (DE&I) with the establishment of the Inclusion Committee and the introduction of the Global DE&I Policy. These initiatives reinforced the Group's commitment to building a workplace where everyone feels welcome, valued, and empowered to reach their full potential.

A key focus in 2024 was nurturing talent through global and regional development programs, mentorships, international job rotations, and personalized coaching. These initiatives were enhanced by opportunities to learn directly from senior leaders, cultivating a culture of continuous growth and leadership excellence. In this sense, Leonardo, the Group's innovative learning ecosystem, continued to play a pivotal role in professional education and knowledge-sharing. Delivering over 9 million hours of education in up to 30 languages, it empowered employees, customers, and eyecare professionals to expand their skills and expertise, shaping the future of the eyewear and vision care industry.

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

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

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

Workforce composition

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

As of December 31, 2024, EssilorLuxottica employed 195,428 people worldwide, across different divisions, functions and locations. Considering the company's vertically integrated business model, employees can be divided in three main groups:

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

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

The tables below provide a detailed overview of the Company's workforce, including regional and country-specific breakdowns, as well as employee characteristics categorized by gender, contract type, job category, and age.

Total workforce

	2024		2023	
	Number	%	Number	%
TOTAL WORKFORCE	**206,533**	**100%**	**203,272**	**100%**
Total number of employees	195,428	95%	191,706	94%
Total number of temporary/agency workers	11,105	5%	11,566	6%

Note: The figures for EssilorLuxottica workforce refers to December 31 of each year. The table reflects data excluding 2024 latest acquisitions (Heidelberg Engineering and Supreme). In 2024, the total workforce increased by 2%, driven primarily by higher activity in labs/plants (including the addition of new labs), growth in stores, and the acquisition of Washin Optical in Japan. The slight reduction in agency workers can be attributed to the Company's trend of prioritizing direct hiring throughout the year. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

Employees breakdown by region

	2024		2023	
TOTAL NUMBER OF EMPLOYEES	**195,428**	**100%**	**191,706**	**100%**
North America	43,772	22%	44,051	23%
EMEA	71,781	37%	70,615	37%
Asia-Pacific	54,270	28%	52,366	27%
Latin America	25,605	13%	24,674	13%

Note: The figures for EssilorLuxottica workforce refers to December 31 of each year. The table reflects data excluding 2024 latest acquisitions (Heidelberg Engineering and Supreme). The geographical breakdown of employees is aligned with the geographical areas identified for revenue disclosure. The employee distribution by region remains the same as 2023 with EMEA as the most populated region. The population of Asia, Oceania is increasing due to the new labs and the integration of Washin Optical Japan. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

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

	2024		2023	
TOTAL NUMBER OF EMPLOYEES	**195,428**	**100%**	**191,706**	**100%**
United States	40,107	21%	40,346	21%
China	26,725	14%	26,694	14%

Note: The figures for EssilorLuxottica workforce refers to December 31 of each year. The table reflects data excluding 2024 latest acquisitions (Heidelberg Engineering and Supreme). As of December 31 2024, The Group has two countries with at least 50 employees and representing at least 10% of total employees. United States represents 21% of total employees and China represents 14%. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

Employees breakdown by gender

	2024		2023	
TOTAL NUMBER OF EMPLOYEES	**195,428**	**100%**	**191,706**	**100%**
Total number of female	117,436	60%	115,196	60%
Total number of male	76,125	39%	74,808	39%
Total number of unknown	1,827	1%	1,702	1%
Total number of other	40	-%	-	-%

Note: The figures for EssilorLuxottica workforce refers to December 31 of each year. The table reflects data excluding 2024 latest acquisitions (Heidelberg Engineering and Supreme). As of December 31, 2024, females represented 60% of the Group's employees, maintaining a similar level to 2023. In 2023, the Group introduced a new category, 'Unknown', and in 2024, following the guidelines of the European directive, added 'Other'. The 'Unknown' category includes individuals who choose not to disclose their gender, while 'Other' represents employees legally registered with a third, neutral, or other gender. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

Employees breakdown by contract type and by gender

	2024		2023	
TOTAL NUMBER OF EMPLOYEES	195,428	100%	191,706	100%
TOTAL NUMBER OF PERMANENT EMPLOYEES	**153,498**	**79%**	**151,292**	**79%**
of which female	92,205	60%	90,998	60%
of which male	60,420	39%	59,560	39%
of which unknown	841	1%	734	-%
of which other	32	-%	-	-%
TOTAL NUMBER OF FIXED TERM EMPLOYEES	**41,930**	**21%**	**40,414**	**21%**
of which female	25,231	60%	24,198	60%
of which male	15,705	37%	15,248	38%
of which unknown	986	2%	968	2%
of which other	8	-%	-	-%
of which total number of non-guaranteed hours employees	*13,082*	*7%*	-	-%
of which female	*8,133*	*62%*	-	-%
of which male	*4,034*	*31%*	-	-%
of which unknown	*908*	*7%*	-	-%
of which other	*7*	*-%*	-	-%

Note: The figures for EssilorLuxottica workforce refers to December 31 of each year. The table reflects data excluding 2024 latest acquisitions (Heidelberg Engineering and Supreme). As of December 31, 2024, employees with permanent contracts represented 79% of the Group's workforce, maintaining a similar level to 2023. Females accounted for 60% of the Group's employees and were the majority across all types of contracts. Non-guaranteed hours contracts (casual contracts) introduced in 2024 following the European directive, made up 7% of the total workforce, primarily in stores and operations roles. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

Employees breakdown by contract type and by region

	2024		2023	
TOTAL NUMBER OF EMPLOYEES	195,428	100%	191,706	100%
TOTAL NUMBER OF PERMANENT EMPLOYEES	**153,498**	**79%**	**151,292**	**79%**
North America	33,660	22%	34,307	23%
EMEA	64,743	42%	63,500	42%
Asia-Pacific	31,678	21%	30,392	20%
Latin America	23,417	15%	23,093	15%
TOTAL NUMBER OF FIXED TERM EMPLOYEES	**41,930**	**21%**	**40,414**	**21%**
North America	10,112	24%	9,744	24%
EMEA	7,038	17%	7,115	18%
Asia-Pacific	22,592	54%	21,974	54%
Latin America	2,188	5%	1,581	4%
of which total number of non-guaranteed hours employees	*13,082*	*7%*	-	-%
North America	*9,113*	*70%*	-	-%
EMEA	*561*	*4%*	-	-%
Asia-Pacific	*3,408*	*26%*	-	-%
Latin America	-	-%	-	-%

Note: The figures for EssilorLuxottica workforce refers to December 31 of each year. The table reflects data excluding 2024 latest acquisitions (Heidelberg Engineering and Supreme). As of December 31, 2024, 79% of the Group's employees were hired with permanent contracts, primarily in the EMEA region. Permanent contracts represent indeed the majority in all regions, accounting for approximately 90% of employees in both EMEA and Latin America. In North America, 23% of employees were hired on fixed-term contracts, while in Asia and Oceania, fixed-term contracts accounted for 42% of employees, mainly in operations and store roles. Non-guaranteed hours contracts were predominantly in North America, linked to a common practice in the local labor market, characterized by greater flexibility. These contracts are not utilized in Latin America. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

Employee turnover

	2024	2023
TOTAL DEPARTURES	**29,610**	**25,813**
Asia-Pacific	3,296	3,974
EMEA	9,111	5,168
Latin America	8,067	6,192
North America	9,136	10,479
TOTAL TURNOVER	**20%**	**22%**
Asia-Pacific	11%	13%
EMEA	15%	16%
Latin America	35%	35%
North America	27%	31%
of which voluntary	***14%***	***16%***
Asia-Pacific	9%	11%
EMEA	11%	11%
Latin America	21%	20%
North America	21%	24%

Note: The figures for EssilorLuxottica workforce refers to December 31 of each year. The table reflects data excluding 2024 latest acquisitions (Heidelberg Engineering and Supreme). The turnover rate is calculated as the total number of permanent employees who left the Group during the reporting period, divided by the average number of permanent employees at the end of each month. Voluntary resignation refers to contract termination initiated solely by the employee for reasons such as career development, personal matters, compensation, termination during probation, no-show, or mutual agreement. The turnover analysis for 2023 excluded GrandVision, while in 2024, it includes the full scope. The turnover rate, including voluntary turnover, decreased by two percentage points compared to 2023. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

Impacts, risks and opportunities related to the Workforce

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

The identified opportunities, such as driving efficiencies through a diverse and inclusive environment and providing employee benefits, can strengthen the organization's connection with global markets, fostering greater efficiency and sustainable growth. The various identified IROs generally relate to the entire workforce, with particular attention to the most vulnerable categories. Currently, efforts are primarily focused on promoting gender inclusion as a key area of action to enhance the Company's profile in this regard.

The identified risks can include challenges such as a potential lack of attractiveness for certain scarce profiles (e.g., doctors and optometrists essential to supporting the retail business), difficulties in retaining employees (particularly among Gen Z), and risks related to non-compliance with working hours regulations. These issues could lead to reputational and financial consequences, adversely affect workers' health, and increase the likelihood of workplace accidents. Negative impacts related to the workforce are also shaped by systemic challenges depending on the region, such as potential concerns around fair wage practices, limited social dialogue measures, or inadequate Human Rights practices, as well as global risks tied to the Group's activities, including potential exposure to various workplace hazards.

As of today, the Group has not identified any material negative impacts on its workforce stemming from transition plans aimed at reducing environmental impacts and achieving greener, climate-neutral operations.

The procedure for setting targets related to managing material impacts, risks, and opportunities varies depending on the specific topic, ensuring that each area is addressed with the appropriate level of attention and precision. For social factors, the approach could involve engaging with local stakeholders (e.g., Social dialogue) or conducting surveys among employees to understand their concerns and priorities (e.g., 'Your Voice'). Whenever relevant or possible, the Company commits to gathering internal feedback through the various communication channels described in the following sections. Additionally, in some cases, targets are specifically designed to align with international guidelines, best practices, or local regulations. For example, the Company may set targets that conform to the expectations outlined in global frameworks such as the United Nations Sustainable Development Goals (SDGs) or align with local laws like the Rixain law, which mandates specific gender equality measures in the workplace, or to pursue internal goals (e.g., Talent development).

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

3.1.2 Employee Engagement & Well-Being

3.1.2.1 Introduction

EssilorLuxottica is committed to supporting its people, continuously enhancing their sense of well-being, while providing them with opportunities to learn and grow. The Company strongly invests in employee engagement, creating an environment where everyone can thrive, feel valued, respected, and continuously learn. A significant milestone in this journey was the launch of the Company's cultural framework and shared values in 2024, a global initiative designed to unite the organization under a shared culture, in alignment with the Company's Mission and business strategy.

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

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

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

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

3.1.2.2 Material impacts, risks, and opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Employee Engagement and Well-being	Risk of lack of attractiveness and retention of employees	When failing to create an appealing work environment, companies can experience high turnover rates, leading to significant costs related to recruiting, hiring, and training new staff. Frequent turnover can result in a loss of institutional knowledge and experience, which hinders productivity and disrupts team dynamics. Additionally, inadequate benefits, limited growth opportunities, and a negative workplace culture can lead to decreased employee morale and engagement, causing disengaged employees to perform at lower levels	• Global DEI Policy • Global Policy on Engagement & Well-being • Global Policy on Employer Branding and Talent Attraction • Global Policy on Salary review	• Number of people engaged in Your Voice and response rate • Group turnover rate (total and voluntary)

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Employee Engagement and Well-being	Risk of non compliance with working hours regulations	Non-compliance with working hours regulations poses risks for both employees and organizations. Legal penalties, including fines and lawsuits from employees, can arise from failing to adhere to labor laws, resulting in costly financial repercussions. Additionally, excessive workloads and prolonged hours can lead to employee burnout, stress, and a decline in overall health, ultimately increasing absenteeism and reducing productivity.	• Code of Ethics	• Number of audits performed on Human Rights related topics (including working hours)
	Potential inadequate wages practices	Potential inadequate wage practices can have several negative impacts on employees. When wages do not reflect the cost of living, employees may experience financial stress, which can lead to decreased morale and job satisfaction.	• Code of Ethics • Group Compensation Framework • Global Policy on Salary review	• Ensuring equity through pay gap monitoring • Integration of the Living wage concept into the salary review process
	Granting employees' benefits	Granting employees benefits that promote work-life balance presents significant opportunities for both the workforce and the organization. By providing flexible work hours, remote work options, and additional paid time off, organizations can significantly enhance job satisfaction which in turns translates to increased productivity, as employees experience reduced stress and burnout, leading to a more focused and motivated workforce.	• Global Policy on Engagement and Well-being	• Share of remote working time globally • Initiatives for flexible work arrangements
	Efficiencies related to promoting diverse and inclusive environment	Promoting a diverse and inclusive environment creates opportunities for increased efficiency and growth. Ensuring gender equality and equal pay, as well as employment and inclusion of persons with disabilities, expands the talent pool, fosters innovation, and enhances employee satisfaction. Prioritizing diversity helps the organization better connect with global markets, while measures against violence and harassment ensure a safer workplace, boosting engagement and reducing risks. Overall, these practices lead to higher productivity, better decision-making, and stronger financial performance.	• Global DEI Policy • Global Anti-harassment and discrimination policy	• Number of people engaged in Your Voice and response rate • Ensuring equity through pay gap monitoring
	Reinforcing of employee sense of commitment and engagement through employee shareholding	Employee shareholding programs strengthen commitment and engagement by aligning employees' interests with the company's performance. This approach fosters a sense of ownership and responsibility, leading to increased motivation, productivity, and loyalty. As shareholders, employees are more invested in the company's success, driving their active participation in its growth and sustainability.	• Group Compensation Framework	• Number and rate of employees participating in company shareholding programs

3.1.2.3 Policies

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

Document	Key content	Function	Scope	Availability
Code of Ethics	EssilorLuxottica's Code of Ethics addresses key workforce well-being topics: • employee shareholding: encourages commitment and aligns employees' interests with the Group's success; • Well-being: promotes a healthy work-life balance, prohibits harmful behaviors, and supports initiatives to enhance quality of life; • decent working hours: ensures compliance with local laws on working hours, overtime, and rest periods; • fair remuneration: guarantees fair compensation that meets or exceeds legal and collective standards; • social benefits and security: provides adequate benefits and ensures compliance with local social security laws.	Compliance	Own operations	Public
SpeakUp platform + Group Reporting Policy	The SpeakUp platform, guided by the Group Reporting policy, is available 24/7 in 19 languages and supported by hotlines in 11 countries to report violations such as corruption, Human Rights issues, moral or sexual harassment, discrimination, violence at the workplace, labor laws, Health & Safety concerns, fraud, and more. The Group Reporting Policy (whistleblowing) outlines who can report concerns through the SpeakUp platform and how reporting can be done, ensuring confidentiality, protecting against retaliation, and supporting effective compliance management.	Compliance/ Human Resources	Value chain	Public
Global Diversity, Equity & Inclusion Policy	The policy outlines the Company's principles and commitments in DE&I areas, which are closely linked to employee well-being and retention and focuses on: • key processes for integrating DE&I principles, including Employer Branding, Talent Attraction and Acquisition, Onboarding, Performance Management and Development, Salary Equity, Engagement and Well-being, Prevention of all forms of abuse, and Support for Parenthood and caregiving; • main dimensions driving the DE&I agenda, such as Gender Equality, Gender Identity and Sexual Orientation, Parenthood and caregiving, Age and Generations, Disability, Ethnicity, Religion, and Culture.	Human Resources	Own operations	Public
Global Policy on Engagement & Well-being	This policy is designed to enhance employee well-being through a comprehensive approach, covering areas such as healthcare, active lifestyle, healthy eating habits, and offering psychological assistance. Additionally, it prioritizes flexible working arrangements, and regular employee feedback through listening campaigns.	Human Resources	Own operations	Internal

Document	Key content	Function	Scope	Availability
Global Policy on anti-harassment and discrimination	This policy enforces a zero-tolerance approach to any form of unlawful discrimination or harassment, ensuring a safe, respectful, and inclusive workplace for all employees in order to improve mental and physical well-being.	Human Resources	Own operations	Internal
Global Policy on Salary Review	This policy outlines the guidelines and procedures for the annual salary and promotion process. It ensures equity, transparency, and alignment with company goals, upholds the principles of equal pay and performance-based rewards through EssilorLuxottica's 'OnePerformance' framework, and promotes a merit-based culture that recognizes contributions and supports personal and organizational growth reinforcing employee retention.	Human Resources	Own operations	Internal
Global Policy on Employer Branding and Talent Attraction	It sets the approach to Employer Branding and Talent Attraction, aimed at enhancing the company's global presence and attracting top talent through a unified and compelling brand. It influences both employee engagement and talent attraction. It ensures equity and inclusivity are enforced in processes and mirroring in the reputation.	Human Resources	Own operations	Internal

3.1.2.4 Processes for engaging with own workers and workers' representatives

EssilorLuxottica's Values and Cultural Framework

In 2022 EssilorLuxottica started to define the Company's shared values representing its people and communities across the world, with the active participation of over 100,000 employees globally in the process. The resulting five company values were unveiled in January 2024 and are described below.

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

Your Voice – Culture Insights

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

To ensure accessibility, the program leverages on technology, allowing employees to respond quickly and anonymously in 34 languages. In 2024, more than 130,000 employees were involved in the listening campaign, resulting in a global participation rate of 78% from all regions and businesses, including offices, stores and industrial sites. The outcome is accessible to Managers and HR teams, so they can initiate team conversations and workshops with local employees to build concrete actions for improvement. The employees are informed and involved in co-creating action plans to improve overall employee experience.

Other channels

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

These include regular updates facilitated by local HR Business Partners, the 'Comitato Welfare' (Welfare Committee) in Italy and the 'Comité Social et Économique' (CSE, Social and Economic Committee) in France, where monthly meetings provide a platform for open dialogue. Senior HR representatives attend these meetings, such as the Italian Welfare Director and his team in Italy, or the country HR Director and his team in France. All these processes are overseen by the Industrial Relations & Welfare Global Team to ensure alignment across the Group.

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

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

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

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

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

3.1.2.6 Actions and resources

EssilorLuxottica's Commitment to Employee Well-Being

Employee well-being is central to the Group's organizational culture, as a healthy, balanced, and engaged workforce is key to sustainable success. EssilorLuxottica recognizes the crucial role a strong welfare system plays in unifying ongoing integration efforts. The Company continues to align its well-being initiatives through global policies that support employees' work-life balance. These guidelines are gradually adapted and implemented across different organizational contexts to ensure relevance and effectiveness.

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

- Flexible Working Arrangements

  EssilorLuxottica prioritizes work-life balance by embracing flexible work models tailored to individual and organizational needs. For office employees, the Company aims to enable remote work for up to 50% of the time. For industrial and corporate employees, initiatives like 'Time for You' in Italy provide shift flexibility and advanced scheduling to enhance personal time management. Retail staff benefits from well-planned shift schedules, and part-time arrangements are made available when possible, to meet personal needs.

- Listening Initiatives

  To continuously improve its well-being programs, EssilorLuxottica regularly conducts surveys and listening initiatives such as Your Voice. These feedback mechanisms help identify areas for improvement and inform action plans that enhance the overall work environment.

- Healthcare

  EssilorLuxottica has always placed great importance on offering its employees healthcare, such as health insurance and supplementary services, in addition to the coverage provided by law. These services include medical check-ups and discounted tariffs and are constantly updated to meet employees' expectations.

- Sport and Active Lifestyle

  The Company actively promotes physical activity through initiatives such as corporate gym programs, subsidized access to fitness services, or equivalent alternatives. These programs encourage employees to lead an active lifestyle, enhancing both physical and mental health.

- Healthy Eating

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

- Psychological Support

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

- Summer Camps

  The Group organizes a summer camp in Bibione, Italy, hosting over 2,500 children of employees from 26 European countries (with the aim of expanding the initiative to welcome more and more children). This initiative supports families during the summer school break and fosters a sense of belonging by connecting children in an international setting filled with engaging activities.

- Family Days

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

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

As a company in continuous growth, transformation and integration, EssilorLuxottica has renewed its commitment in 2024 by launching an extensive mapping of welfare and well-being initiatives worldwide. This process aims to identify local best practices, processes, employee needs, and cultural differences. The insights gathered will help establish global standards that serve as a benchmark for all regions. By the end of this mapping exercise in 2025, harmonization targets will be set to align practices across different countries.

Employee volunteering

In 2024, EssilorLuxottica continued to inspire employee involvement in the impactful work of the OneSight EssilorLuxottica Foundation, as highlighted in Section 3.3 *ESRS S3 – Affected Communities*. Employees are encouraged to participate in activities that advance global eye health, such as contributing to vision clinics or supporting initiatives tied to World Sight Day.

During the year over 5,500 employees actively volunteered in vision clinics or in skills-based activities providing patient care in their regions. This approach not only amplifies the Foundation's mission to eliminate uncorrected poor vision within a generation but also deepens employee connection to the Company's broader purpose and social impact.

Equitable and Competitive Compensation Framework

EssilorLuxottica is committed to recognizing and motivating its 195,000 employees through a compensation policy that is both competitive and fair. This policy is founded on three core principles: pay equity for work of equal value, performance-based remuneration, and the equitable sharing of value created. By fostering a culture of excellence, innovation, and diversity, the Group enhances employee engagement, drives individual and collective performance, and supports talent development, all in service of its mission: 'Helping people see more and be more'. Beyond monetary remuneration, the Group's holistic approach integrates value-sharing mechanisms, social benefits, and welfare programs, ensuring fairness and alignment with its centralized governance framework.

The Group's compensation framework is built on four fundamental pillars, below described.

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

Since its inception, the Group has actively involved its employees in its value creation, reinforcing a sense of ownership and alignment with its long-term vision. Every year, nearly 100,000 employees are eligible to participate in co-investment plans, open to all without distinction of status, with flexible participation terms such as instalment payments to facilitate investment. In parallel, more than 9,000 employees benefit from performance share plans, ensuring alignment between individual efforts, the Group's strategic objectives, and shareholder interests.

Today, over 83,500 active and former employees are shareholders in the Group. Its ambition is to increase the number of employee shareholders in order to strengthen collective engagement and the sharing of the value created.

To support employee shareholders, a dedicated internal service provides daily assistance, offering clear information, streamlining administrative procedures with financial institutions, and organizing financial education sessions. Through personalized support and a dedicated intranet platform, each employee shareholder can track their portfolio in real-time and access relevant resources.

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

2. Commitment to Employee Well-being

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

3. Performance-Based Compensation & Equity Promotion

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

The policy is structured around three core compensation processes:

a) Annual Salary Reviews;

b) Annual Variable Compensation;

c) Long-Term Incentive Plans (LTI).

a) Annual Salary Reviews

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

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

2024 Gender Pay Gap analysis

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

This methodology follows a two-step approach:

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

The 2024 gender pay gap analysis, conducted on 170,000 employees, equal to 87% of the Group's workforce, was based on annual cash compensation levels across all employees[(1)].

In compliance with regulatory requirements, a Group-wide ratio was calculated regardless of job classification, revealing a median gender pay gap of 2% and an average gap of 16%.

When accounting for employee classifications within each country, the global median gender pay gap stands at 4% and the average at 6%.

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

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

- unconscious bias training to raise awareness among teams and managers;
- dedicated support programs to assist employees, particularly during their return from maternity leave.

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

2024 Adequate Wage analysis

Beyond the principles of equity and competitiveness, ensuring a remuneration level that covers essential needs and provides a decent standard of living is a strong commitment of the Group.

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

Building on the data collected for the gender pay gap analysis, in 2024 a comprehensive study covered 170,000 employees, representing 87% of the workforce.

Using the minimum wage determined by legislation or collective bargaining as an adequate wage benchmark, the analysis confirmed that all Group employees in countries with an established regulatory minimum wage level, receive a base salary that exceeds the minimum wage and represents 99% of EssilorLuxottica's workforce. When additional fixed components such as seniority and holiday bonuses are included, total fixed remuneration surpasses this threshold even further.

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

For the remaining 1% of employees, in countries without a legal minimum wage, fixed remuneration was compared against a living wage benchmark provided by the Fair Wage Network[1].

The study identified 236 employees (0.15% of the workforce) whose fixed remuneration falls below the living wage benchmark. In most cases, this reflects the specific compensation structure in the retail business, where commissions represent a significant share of total earnings.

EssilorLuxottica remains committed to continuously enhancing its compensation practices. The Group integrates the principle of an adequate wage into its salary review process, ensuring that remuneration remains fair, competitive, and aligned with evolving market standards.

b) Annual Variable Compensation

The annual variable compensation ('MBO') for corporate executive officers is based exclusively on quantitative objectives. For 2024, three key criteria have been defined: net earnings per share, revenue growth, and adjusted operating income.

These three criteria form the Group-wide component of the variable pay scheme, applicable to 15,000 eligible employees. This Group component is further complemented by quantitative objectives specific to each business unit and function, ensuring a fair and relevant performance evaluation.

c) Long-Term Incentive Plans (LTI)

These plans designed to align employees with the Group's strategic priorities and strengthen their long-term engagement are based on uniform performance criteria for all 9,000 beneficiaries. For the 2024-2027 plan, these criteria are structured as follows:

- 40% based on annualized share price growth;
- 40% based on cumulative adjusted net earnings per share;
- 20% based on corporate social responsibility (CSR) objectives.

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

4. Centralized Governance & Local Adaptation

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

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

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

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

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

3.1.2.7 Targets and metrics

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

Welfare & Well-being

EssilorLuxottica is committed to fostering a supportive and inclusive work environment. By 2025, the Group aims to harmonize welfare and well-being practices globally, leveraging insights from a comprehensive mapping of initiatives, employee needs, and cultural differences conducted in 2024. This approach ensures that well-being programs are aligned with diverse expectations across regions while maintaining a high standard of support for employees worldwide.

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

Compensation

Adequate Wages: as of today 99% of employees earn above the legal minimum wage in countries with regulatory standards. The 0.15% (within the 1% of employees in countries without a legal minimum wage) earn below the adequate wage reference. This is primarily due to a different compensation structure in the retail business, where commissions have a significant weigh. EssilorLuxottica is dedicated to continuously improving its compensation practices to ensure fairness and sustainability. The concept of adequate wage is embedded in the salary review process, reinforcing the Group's commitment to providing wages that support a decent standard of living.

Gender Pay Equity: while the available data indicate that significant gender pay gaps are not observed at the Group level, EssilorLuxottica recognizes the importance of continuous vigilance in maintaining pay equity. The Group-wide gender pay gap (overall), as of today is 2% median and 16%. The Global gender pay gap (by employee classification within countries) is 4% median and 6% average. The Group is committed to regularly monitoring gender pay gaps and taking necessary measures to ensure fairness across all levels.

3.1.3 Health & Safety

3.1.3.1 Introduction

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

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

3.1.3.2 Material impacts, risks and opportunities

Material ESG Topic	IRO name	IRO description	Policy	Target/Metric
Health & Safety	Potential exposure to various workplace hazards	Inadequate Health & Safety measures can have a negative impact on the workforce, primarily through the lack of proper personal protective equipment (PPE) and maintenance of tools and equipment, leading to increase in the number of workplace injuries. When workers do not feel safe and protected, it fosters a negative workplace environment which can severely impact morale and overall job satisfaction.	• EHS Policy	• Zero work-related fatality • Frequency rate • Severity rate

3.1.3.3 Policies

Document	Key content	Function	Scope	Availability
Code of Ethics	The Code of Ethics clearly states that EssilorLuxottica applies high occupational, Health & 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.	Compliance	Own operations	Public
Environment Health & Safety Policy	The policy is based on EssilorLuxottica's belief that safeguarding the Environment and the Health & Safety of its employees, contractors, agency workers, visitors, customers and local communities is everyone's duty, in respect of their role and responsibilities inside the company. The policy states the importance of people's behaviours as the main factor for the prevention of accidents and for the deployment of a strong safety culture that prevents accidents.	EHS	Own operations	Public
Product Stewardship – Safety and Compliance of Chemicals, Materials and Components Policy	Product Stewardship is a Health & Safety and environmental management strategy that involves proactive management of chemicals and materials to design, produce, sell, or use a product. The Company, in fact, takes responsibility for minimizing impact on the environment and Health & Safety throughout all stages of the product life cycle. The objective of this document is to outline management methods and parties involved in product stewardship, for instance with reference to compliance with chemical regulations/laws, control and management of risks associated with the storage, use and disposal of chemicals and materials in the workplace. The policy helps the facility director and/or EHS manager i) determine the emergency situations linked to chemicals in routine or non-routine tasks (people exposure, fire, spills, contamination, incompatible chemical reactions) and ii) ensure a Procedure with emergency action plan is in place. The policy is based on relevant standards (e.g., ISO 45001 international occupational health and safety standard, ISO 14001 international standard for environmental management systems, ISO 13485 international standard for medical devices – Quality management systems, ISO 9001 international standard for quality management systems, Globally Harmonized System of Classification and Labelling of Chemicals (GHS)).	EHS	Own operations	Internal
EssilorLuxottica Machinery Safety Policy (ELMS)	The purpose of this policy is to: • harmonize the safety levels of New Machinery to ensure employees use it with an appropriate level of safety; • propose training for employees to increase skills and competences; • define guidelines that must be followed when acquiring New Version of Machinery; • define guidelines that must be followed to manage the Transfer of Machinery and Existing Machinery.	EHS	Own operations	Internal

3.1.3.4 Engaging with own workers on Health & Safety

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

It is worth mentioning the following EHS initiatives to develop and deploy the Company's safety culture:

- Safety Committees – At regional and local levels, site leaders involve employees in safety oriented initiatives on a regular basis (weekly to monthly), including observations and feedback on unsafe acts/unsafe conditions, with the goal to build actions plan to mitigate all risks observed. The outcomes of these initiatives could also lead the Group to integrate certain observations within its decision-making processes.
- Behavior Based Safety Program – Present in every region in different sites, this program encourages employees to observe and identify potential risks. By so doing, the Safety culture within the organization is enhanced.
- Safety Corners -These are designated locations for posting information on Health & Safety matters and reporting unsafe or risky situations for workers.
- Incident reporting – Safety Policies and procedures in force allow employees to escalate any incident related to Safety to the management. This ensures the Company keeps visibility through all the processes directly with the eyes of the workers. Moreover, EssilorLuxottica tracks and monitors a series of statistics not only related to incidents, but also regarding near miss and potential unsafe actions and conditions that constitute as leading KPIs for continuous improvement process.
- Safety Bulletins – By using them, relevant information can be timely communicated to all workers at site level. The information spread is often related to specific topics raised by the workforce itself.
- Safety Days – These events represent one of the Global initiatives that allow the Company, annually or more often, to create engagement, inform and educate on safety-related topics, often raised by the workforce itself.
- Town Hall meetings – The meetings are held at regional level and provide the organization with some updates on business, performance and EHS initiatives at the global and local level.

Facility leaders, led by the Chief Operating Officer (COO), are responsible for the implementation of the above mentioned initiatives. In parallel, at the regional and local level, the Environment, Health & Safety (EHS) teams validate these initiatives and set procedures to stimulate employee engagement on these topics and ease the execution of actions in the entire Group. The central EHS team then oversees all these initiatives, ensures the application of Group guidelines and monitors the Company's EHS performance.

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

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

The Company is also actively part of Regional EHS Associations or Networks to participate in specific conversations related to Safety and Environmental topics, to overcome specific identified risks or to contribute to provide guidelines to local authorities.

3.1.3.5 Preventing and managing Health & Safety risks to people

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

The Company operates in regions where the application of legislation in relation to Human Rights and the environment may be limited or fall below international standards. In such situations, EssilorLuxottica strives to perform its activities in accordance with international standards for the protection of Human Rights and the environment, and implement actions designed to prevent negative consequences in these areas, and remedy them should they occur.

The Environment, Health & Safety function at EssilorLuxottica is responsible for the deployment of environmental management systems aimed at reducing environmental impact and ensuring the Health & Safety of all employees worldwide. In this respect, the increase in the number of sites or regions certified according to ISO 14001 and ISO 45001 will support a standard approach of prevention and risk/impact mitigation. The EHS function is responsible for the consolidation of quantitative inputs collected in Gensuite, a tool used by all the local EHS of Operations' sites and dedicated also to the reporting of H&S KPIs, including observations and near misses raised by the workforce.

The Company also adopts escalation tools and procedures to allow local workers to report potential risks or incidents. Consolidation of data and events allows EssilorLuxottica to cascade top-down, using different communication tools, all the actions and initiatives done to prevent reoccurrence, mitigate specific risks and address the raised concerns.

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

3.1.3.6 Actions and resources

Assessing Health & Safety risks

EssilorLuxottica assesses its risk exposure through the Group risk assessment process (see Section 2.1 of the 2024 Universal Registration Document), which incorporates the identification and evaluation of ESG risks such as Health & Safety, and through EssilorLuxottica Responsible Sourcing and Manufacturing program that apply to both manufacturing sites and suppliers globally (see Section 3.2 *ESRS S2 – Workers in the Value Chain*).

Each site assesses the overall and specific EH&S risks applying the Corporate and regional guidelines and adapting the outcome to any specific regulations that may apply at the regional or local level. Tracking systems are in place to follow up on actions plan accordingly.

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

The Corporate EHS Team is dedicated to setting the processes and procedures to engage the workforce and to ease the execution of mentioned actions. At local and regional level, the Operations team in the sites, led by the COO function, are responsible to implement all the initiatives described, with a validation of the EHS local or regional contact. The EHS Team in the global organization in 2024 counts more than 300 professionals.

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

Minimizing workplace hazards

As stated in the Group EHS policy released in 2024, EssilorLuxottica's approach to prevent and minimize workplace hazards is consistent with international standards and its target of reducing work-related accidents to a minimum. As such, throughout the past few years, several production and logistics sites and prescription labs have obtained the ISO 45001:2018 Occupational Health & Safety Management certification, which provides a framework to identify and improve employee safety while preventing workplace risks. In 2024, 29 mass production plants, 15 lens laboratories, five logistic centers, and three corporate offices were certified ISO 45001:2018, covering approximately 28% of the Group total headcount. The Company will continue to increase the number of certified sites in the future, evolving its own certification schemes according to the Group and business needs.

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

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

- Chemicals Management tool – To ensure full respect of the Group policy on Product Stewardship, a new digital solution is under development in order to manage compliance, industrial hygiene and risk assessment for any new chemicals introduced in the manufacturing processes, working proactively to assess, control and mitigate the risks. This also allows EssilorLuxottica to manage the phase out of the PFAS group of chemicals (so called 'forever chemicals'). The goal is to rollout the new IT solution starting in 2025, to cover the entire scope of Operations by end of 2026.
- PFAS program – In 2023, the Company started mapping the presence of PFAS in its products and processes and has launched projects to replace them where present. The PFAS program includes the entire scope of Operations sites for the company, being regulated by the Product Stewardship Policy who specifically requires the company to manage those components in terms of introduction and phase out.
- High-Risk Operations (HRO) referential – The implementation of technical referential documents is required for any process considered as High-Risk Operations for people and the environment. The program aims to map all HRO within the Company's Operations sites and to harmonize the approach in terms of technical requirements, risk assessment and auditing process, mitigating and controlling any risks in accordance with the Group EHS global policy. The program started in early 2024 and is expected to be continued in 2025.
- Machine Safety program – The new global standard for machine safety was released in 2024, targeting the implementation across the entire Group Operations. The scope of the document is to level up all the existing local policies according to the most stringent international technical standards, to allow the company to buy and design machines with the highest safety standards. Implementation has started in the Mass Production business units in 2024, being extended to the other Operations sites in the following two years.

- Behavior Based Safety Program (BBS) – As mentioned above, the program encourages employees' active participation in detecting any existing risks in the Operations. First launched in Italy, the BBS program will be progressively extended to the main sites of the entire organization, starting from the full Operations perimeter by 2026.
- Ergonomics Program – A team fully dedicated to Ergonomics strategy was created in 2023, with the aim to mitigate ergonomic risks in all countries and business units. The outcome of this program is to interject in any Operations processes (design, implementation, tasks execution), assessing the risks and implementing actions to prevent long term exposure or injuries. A unique Ergonomics Policy is being redacted and will be released in due course, creating a link with other policies (e.g., Machine Safety) to allow its implementation. Harmonization of ergonomic risk assessment approaches is also a focus, with the goal of mapping existing tools across the organization and identifying the most convenient to be spread across. The Ergonomics program aims also to map existing risks and identify the ones most present, to then work on a clear action plan of countermeasures. In 2024 main actions were pursued to complete Ergonomics competences mapping of the entire Organization, to take a first step in prioritizing the main ergo risks for the different Business Units and Regions, to define the ergo tech specs to support the preventative approach in the new machines design phase, as well as pre-assessing the different ergo digital tools in use at regional level to identify the best standard.
- Reporting tools and digitalization plan – Gensuite® is the main database for the collection and management of key EHS data and KPIs related to safety and sustainability, enabling the Group to achieve greater data consistency and improve information integration. A dedicated team has been working to expand tool capabilities and strengthen it as the mandatory platform for all operations sites. For instance, a new feature has been implemented in 2024 to allow the sites working with Gensuite to create actions plans to follow up of any incident, near miss or compliance conditions needed to reduce the risk. Among the new features, AI has also been assessed to create more automatic reports and reduce the turnaround time for actions identification.
- Loss Prevention program – The program covers the entire Operations organization from fire, flooding, and other potential risk scenarios that would impact workers' safety. A long-term agreement has been signed with an international partner for risk assessment and mitigation on this topic. An IT tool has been launched in 2024 to collect and monitor all the audit outcomes to allow the Corporate Team to oversee the risk mitigation actions implementation. In this way, compliance with the Group's EHS Global Policy and its Loss Prevention procedures is guaranteed, and a plan up to 2028 is being identified to increase coverage rate and reduce the overall risk at the expected level.
- Auditing system – The EHS auditing system is in place at regional level, to identify any potential noncompliance or risk situation. Actions plans are then created to follow up and their completion is measured accordingly. The audit system is also enhanced by the ISO certification process.
- Health & Safety trainings – Regular awareness-raising and training initiatives are delivered to employees via dedicated e-learning modules also available on Leonardo and face-to-face settings.

3.1.3.7 Targets and metrics

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

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

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

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

Metrics

Work-related fatalities, injuries and illness

	2024	2023
TOTAL NUMBER OF WORK-RELATED FATALITIES	**-**	**1**
• employees	-	1
• agency workers	-	-
TOTAL NUMBER OF WORK-RELATED INJURIES	**743**	**602**
TOTAL NUMBER OF WORK-RELATED INJURIES WITH ABSENCE	**469**	**326**
• employees	439	295
• agency workers	30	31
TOTAL NUMBER OF WORK-RELATED INJURIES WITHOUT ABSENCE	**274**	**276**
• employees	267	276
• agency workers	7	-
NUMBER OF LOST DAYS DUE TO WORK-RELATED INJURIES WITH ABSENCE	**14,218**	**7,990**
• employees	13,914	7,514
• agency workers	304	476
TOTAL NUMBER OF CASES OF OCCUPATIONAL ILLNESSES WITH ABSENCE	**16**	**8**
• employees	15	8
• agency workers	1	-
NUMBER OF LOST DAYS DUE TO OCCUPATIONAL ILLNESS	**1,457**	**323**
• employees	1,456	323
• agency workers	1	-
FREQUENCY RATE FOR WORK-RELATED INJURIES WITH ABSENCE	**1.7**	**1.3**
• employees	1.7	1.3
• agency workers	1.6	1.7
SEVERITY RATE FOR WORK-RELATED INJURIES WITH ABSENCE	**0.1**	**-**
• employees	0.1	-
• agency workers	-	-
TOTAL RECORDABLE INCIDENT RATE	**2.6**	**2.5**
• employees	2.7	2.6
• agency workers	1.9	1.7

The Health & Safety performance shown in the above table is considerably affected by the expansion of the reporting scope. In fact, while in the previous year the Group started to include the retail network in the disclosure of the Health & Safety indicators, in 2024 the number of countries included have significantly increased, including almost all Latin-American countries and expanding the EMEA coverage, reporting the information for more than 80% of the retail headcounts (vs 36% in 2023).

In 2024, EssilorLuxottica did not register any fatalities, continuing to direct its efforts on the well-being of its workers, recording relevant improvements in the Operations performance on Health & Safety.

3.1.4 Social Dialogue and Freedom of Association

3.1.4.1 Introduction

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

3.1.4.2 Material impacts, risks and opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Social Dialogue and freedom of association	Potential lack of social dialogue measures	Inadequate freedom of association prevents employees from forming or joining unions, limiting their ability to advocate for their rights and interests. This results in a sense of isolation and disempowerment among workers. Additionally, the absence of works councils and insufficient information, consultation, and participation rights means employees are often excluded from decision-making processes that affect their working conditions, leading to feelings of undervaluation. Furthermore, ineffective collective bargaining can leave many workers unprotected by collective agreements, resulting in unequal treatment regarding wages, benefits, and working conditions.	Code of Ethics	• Representation of employees through regional works councils • Employees covered by collective bargaining

3.1.4.3 Policies

Document	Key content	Function	Scope	Availability
Code of Ethics	The Code of Ethics outlines EssilorLuxottica's commitment to freedom of association and the right to collective bargaining, in line with national laws and practices. It affirms respect for employees' rights to form and join unions freely and ensures no discrimination based on union membership, demonstrating the Group's dedication to fair and ethical workplace practices.	Compliance	Own operations	Public
SpeakUp platform + Group Reporting Policy	The SpeakUp platform is guided by the Group Reporting Policy, is available 24/7 in 19 languages and supported by hotlines in 11 countries, to report violations such as corruption, Human Rights issues, collective bargaining and freedom of association, moral or sexual harassment, discrimination, violence at the workplace, labor laws, Health & Safety concerns, fraud, and more. The Group Reporting Policy (whistleblowing) outlines who can report concerns through the SpeakUp platform and how reporting can be done, ensuring confidentiality, protecting against retaliation, and supporting effective compliance management.	Compliance/ Human Resources	Value chain	Public

3.1.4.4 Processes for engaging with own workers and workers' representatives

EssilorLuxottica attributes the highest importance to social dialogue and employee engagement. The Group recognizes that open, inclusive communication with employees and their representatives is essential to creating a work environment where collaboration, trust, and mutual respect can thrive. Social dialogue is seen as more than just a legal obligation, it is a powerful tool for sustainable business development, driven by active participation and the exchange of ideas between the Company and its workforce.

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

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

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

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

Aiming for continuous improvement, the effectiveness of these engagements will be increasingly monitored through a comprehensive set of KPIs on a global level which are currently under development.

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

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

Grievance and Whistleblowing Mechanisms

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

If these options are not feasible, employees can use the Group's SpeakUp reporting tool, launched worldwide in 2023. This tool consolidates various pre-existing systems and is being gradually rolled out across Group entities.

For further details on SpeakUp reporting platform and policy and Open-door policy please refer to Section 3.1.6.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns*.

To address the specific risk of a potential lack of social dialogue measures, the Global Industrial Relations function monitors key indicators such as the level of collective bargaining worldwide coverage, and engages with all the relevant stakeholders at a regional level. A comprehensive global industrial relations dashboard is currently under development with the aim to monitor key indicators at a global level, providing valuable insights into the overall workplace climate (such as the number and participation rate in strikes, as well as employment-related legal disputes). Additionally, through various committees and ongoing dialogue with unions, feedback is collected to refine and enhance the strategy year after year, as detailed in the following section.

3.1.4.6 Actions and resources

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

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

Strengthening Social Dialogue through the European Works Council

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

The newly formed EWC represents employees from all 26 EU countries, with the United Kingdom as a permanent participant, covering over 53,000 employees in the EU and an additional 8,000 employees in the UK. This initiative reflects EssilorLuxottica's vision of promoting inclusive dialogue and sustainable growth through ongoing collaboration with employee representatives.

The first plenary session of the EWC took place on November 27 – 29, 2024, in Agordo (Belluno, Italy), where key company leaders, including the Chief Human Resources Officer and the Chief Operating Officer, presented and discussed critical topics with employee representatives, including EssilorLuxottica's global strategy, economic and financial performance, business and operational trends. The session aimed to foster a proficient, open, and transparent dialogue, ensuring that employees are informed about the Group's strategic direction and operational developments.

By so doing, the Group continues to build a workplace culture rooted in collaboration, transparency, and trust.

Introduction of the four-day working week

Starting in 2024, EssilorLuxottica implemented a landmark agreement signed in December 2023 with national sectoral organizations in Italy, introducing a new supplementary contract for the 2024-2026 period. This agreement marked the launch of the four-day working week in Italian factories, underscoring the Group's commitment to employee well-being and sustainable growth through innovative work-life balance solutions.

The agreement introduced the possibility for factory workers to operate from Monday to Thursday for 20 weeks each year, predominantly allowing Fridays for personal time. Participation in this new schedule was voluntary and ensured full salary continuity, with the reduction in workdays primarily funded by the Company and only minimally by individual resources.

This initiative extended the flexible arrangements already available to office-based employees globally – such as the option to work remotely up to 50% of the time – to factory employees. The goal is to complete the full implementation of the new work schedule within two years, ensuring that productivity and operational efficiency remain unaffected.

Through this agreement, EssilorLuxottica demonstrated its commitment to fostering social dialogue and enhancing employee engagement. By prioritizing work-life balance and flexibility, the Group reinforced its belief that sustainable business growth is rooted in the well-being and satisfaction of its workforce.

Collective Bargaining Approach

The EssilorLuxottica Group welcomes collective bargaining wherever it is provided for by applicable regulations or local practices.

Where a national collective bargaining is in place, the Group promotes a further social dialogue with trade unions, where applicable, or with workers' representatives in order to improve the conditions established by national regulations and/or national collective bargaining.

Typically, collective bargaining within the Group focuses on:

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

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

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

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

3.1.4.7 Targets and metrics

As a company in continuous growth, transformation and integration, EssilorLuxottica has initiated a comprehensive global mapping initiative for social dialogue and collective bargaining. This effort aims to evaluate existing practices, processes, employee needs, and cultural differences across all the countries where the Group operates. By identifying local best practices, the initiative will help define central global standards to which different regions should align. Following the completion of this assessment, specific harmonization targets will be set to ensure a consistent and effective approach to social dialogue, collective bargaining and freedom of association across the Group's global operations.

Metrics

Employee covered by collective bargaining per region

	2024
TOTAL EMPLOYEES	**39%**
North America	1%
EMEA	59%
Asia-Pacific	47%
Latin America	37%

Note: The figures for EssilorLuxottica workforce refers to December 31 of each year. In this scope, joint ventures and agency workers are excluded, focusing solely on employees. The baseline is consistent with other breakdowns in the section. The percentage of collective bargaining specific to the EEA area, within the EMEA region, amounts to 78% employee coverage.The coverage percentages by region are consistent with local practices and standards related to collective bargaining. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

3.1.4.8 Talent Management and Development

3.1.4.9 Introduction

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

3.1.4.10 Material impacts, risks and opportunities

Material ESG Topic	IRO name	IRO description	Policy	Target/Metric
Talent Management and Development	Employees' personal and professional growth	Investing in employees' personal and professional growth through training and skills development positively impacts the workforce by enhancing expertise, improving job satisfaction, and increasing overall team effectiveness. Continuous learning opportunities empower employees to adapt to industry changes, take on new challenges, and advance their careers.	• Code of Ethics • Global DEI Policy • Global Policy on Anti-Harassment and Discrimination • Global Policy on Onboarding • Global Policy on Performance management, succession plan and development • Global Procedure on Talent Acquisition • Global Policy on Employer Branding and Talent Attraction • Global Policy on Salary Review	• Employees engaged in global talent development initiatives • Employees worldwide participating in performance and development programs • Total hours of education and training delivered

3.1.4.11 Policies

Aside from the Code of Ethics and SpeakUp, which have unique characteristics, all other policies listed below reaffirm the Company's commitment to conducting its activities in full compliance with legal requirements at both international and local levels. The policies aim to safeguard Human Rights and promote principles established by international organizations, including the 2030 Agenda for Sustainable Development and its related Sustainable Development Goals (SDGs), the United Nations Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organization (ILO), and the OECD Guidelines. These principles are implemented through organizational frameworks, external engagement initiatives, and specific internal tools. The Chief People Officer and their direct reports are ultimately responsible for ensuring the proper implementation of these policies. All these policies were developed with the support of technical experts and in collaboration with local HR teams to ensure compliance with local legislation and alignment with the needs of all regions. Internal policies are accessible to employees via the company intranet or can be provided upon request to the HR Admin.

Document	Key content	Function	Scope	Availability
Code of Ethics	The Company recruits and engages employees with a long-term perspective. Training, development, and equal opportunities for all are integral throughout employees' careers. It supports growth and career advancement while promoting internal mobility through its dedicated platform, One Career, and various talent programs. The Company provides continuous training, education, and development opportunities, both on the job and through its Leonardo platform.	Compliance	Own operations	Public
Global Diversity, Equity & Inclusion Policy	This policy outlines the Company's principles and commitments in DE&I areas. Focus is on: • key processes for integrating DE&I principles, including Employer Branding, Talent Attraction and Acquisition, Onboarding, Performance Management and Development, Salary Equity, Engagement and Well-being, Prevention of all forms of abuse, and Support for Parenthood and caregiving; • main dimensions driving the DE&I agenda, such as Gender Equality, Gender Identity and Sexual Orientation, Parenthood and caregiving, Age and Generations, Disability, Ethnicity, Religion, and Culture.	Human Resources	Own operations	Public
Global Policy on Anti-Harassment and Discrimination	This policy enforces a zero-tolerance approach to any form of discrimination or harassment, ensuring a safe, respectful, and inclusive workplace for all employees.	Human Resources	Own operations	Internal
Global Policy on Onboarding	The policy formalizes EssilorLuxottica's standard practices on Onboarding and induction.	Human Resources	Own operations	Internal
Global Policy on Performance management, succession plan and development	The policy formalizes the overall performance management process free of any discrimination and in the light of meritocracy.	Human Resources	Own operations	Internal
Global Procedure on Talent Acquisition	It formalizes an unbiased and discrimination-free talent acquisition process.	Human Resources	Own operations	Internal

Document	Key content	Function	Scope	Availability
Global Policy on Employer Branding and Talent Attraction	It sets the approach to Employer Branding and Talent Attraction (EBTA), aimed at enhancing the company's global presence and attracting top talent through a unified and compelling brand. It influences both employee engagement and talent attraction. It ensures equity and inclusivity are enforced in processes and mirroring in the reputation.	Human Resources	Own operations	Internal
Global Policy on Salary Review	This policy outlines the guidelines and procedures for the annual salary and promotion process, aiming to attract, retain, and motivate high-performing employees. It ensures equity, transparency, and alignment with company goals, upholds the principles of equal pay and performance-based rewards through the 'OnePerformance' framework, and promotes a merit-based culture that recognizes contributions and supports personal and organizational growth.	Human Resources	Own operations	Internal

3.1.4.12 Processes for engaging with own workers and workers' representatives

EssilorLuxottica leverages multiple engagement channels to ensure seamless and ongoing communication with its employees. Alongside regular internal communication through local HR Business Partners, in 2024, the first global corporate culture survey, *Your Voice*, was launched. Additionally, the Company continued to expand the scope of its performance management process, *OnePerformance*, designed to ensure regular top-down and bottom-up feedback. All of this is driven by its five shared values, which shape the unified corporate culture of the Group. In particular, EssilorLuxottica's Competency Model has been developed in alignment with these five company values and defines the competences to grow and succeed at EssilorLuxottica. Complementing this, *OnePerformance*, reinforces employee engagement by allowing them to set clear objectives, share expectations, and deliver meaningful feedback. It recognizes achievements, celebrates individual contributions, and emphasizes development opportunities.

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

3.1.4.13 Actions and resources

At EssilorLuxottica, nurturing talent remains a top priority. In 2024, the Company continued to enhance the global development initiatives while broadening participation across regional programs, each designed to support growth and career advancement. For high-potential talents and successors, opportunities include global and regional mentorship programs, comprehensive leadership development initiatives, international job rotations, personalized leadership coaching, and capability assessment tools. These efforts are complemented by unique opportunities to learn directly from the Group's most senior leaders, fostering a culture of continuous growth and leadership excellence.

Talent Development

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

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

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

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

In addition, future leaders are offered international job rotations and 6-month leadership development programs, such as i) Enable, dedicated to emerging talents, ii) Empower, dedicated to middle manager talents, iii) Advance, dedicated to functional leaders.

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

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

Talent Management and Development

Since 2023, a unified and consistent approach to performance management – called OnePerformance – has been rolled out across the organization, reaching around 56,000 employees worldwide in 2024, while continuing to work on its expansion in other entities and countries.

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

The process kicks off with the 'Goal Setting and Continuous Feedback' phase, where employees and managers agree on individual goals aligned with company and functional priorities.

The process then moves to the 'Self and Manager Evaluation' phase, where employees are highly encouraged to evaluate their own performance to raise their self-awareness around their strengths and barriers and where managers provide an evaluation of both 'what' and 'how' dimensions.

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

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

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

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

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

Indeed, a global succession plan framework has been recently designed and implemented to identify internal candidates who are ready to advance within the organization, ensuring continuity in the critical roles and strengthening our future leadership pipeline.

Succession readiness is assessed across three levels:

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

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

Talent Attraction and Employer Branding

In 2024, the Group introduced its new Employer Value Proposition (EVP), 'The Future Insight', inspired by its core values.

To support its EVP, EssilorLuxottica launched the Upskilling Program, a global training initiative aimed at enhancing HR expertise in employer branding and talent attraction. The program provides HR professionals with practical resources, including guides on conducting competency-based interviews, crafting compelling job postings, and establishing strategic, long-term partnerships with universities and business schools. This program ensures HR teams worldwide are empowered to align their efforts with the Group's talent attraction strategy, which is built on three strategic pillars:

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

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

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

EssilorLuxottica's commitment to education and talent development is exemplified through its flagship programs:

- The Operations Talent Program (OTP) – A two-year development path tailored for new graduates from STEM fields, equipping them with essential skills to thrive in EssilorLuxottica's operations. Initially launched in Agordo (Italy) and Créteil (France), the program expanded globally in 2024 to include Thailand, Mexico, Brazil, and the United States. With a strong focus on diversity, women represented 47% of the participants across the 2023 and 2024 editions of the program. Notably, the 2024 cohort shows a significant increase, with women making up 70% of its participants. The OTP is a cornerstone of EssilorLuxottica's strategy to build an international pipeline of operational leaders.
- The EssilorLuxottica Smart Eyewear Lab (SEL): Located in Milan, this cutting-edge joint research platform with Politecnico di Milano is designed to shape the smart glasses of the future. Over five years, more than 100 researchers and scientists have collaborated in a dedicated space, driving technological innovation in eyewear. Currently based at the Leonardo Campus, the lab will move in the near future to Milan's Bovisa Innovation District, a redevelopment project led by Renzo Piano.

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

Accessible Education through Leonardo, the Group's Learning Ecosystem

Leonardo, EssilorLuxottica's learning ecosystem, features expert-curated content that can be tailored to learner needs. It has been designed to be accessible for every member of the eyewear and vision care community across the world. It addresses EssilorLuxottica employees and customers, as well as eyecare professionals at every level and every role, offering them the opportunity to continuously expand their skills, knowledge, and mindset. With this broad 'unlocking' of knowledge, EssilorLuxottica makes an investment that represents one of the levers used to help unravel the potential of the industry. Since its launch in 2021, Leonardo has delivered over 9 million hours of education in up to 30 languages, becoming a key tool for attracting and retaining resources.

Leonardo uses a blended approach to education, combining on-demand content with live sessions, virtual classes, and digital services which are available to both EssilorLuxottica clients and employees. In 2024, Leonardo strengthened its educational offer, to which new structured programs, such as Luxury Eyewear: Crafting Excellence, Transitions Expert, Ray-Ban | Meta Smart Glasses, Nuance Audio and World of Optics programs, as well as on-demand content have been added. Among the novelties released during the year it is worth mentioning the Competency Hub, a space where all employees can explore the new Competency Model with a customized experience, tailored to their needs.

Moreover, its continuous commitment to learners has been solidified with the renewal of its partnership with Harvard Business Publishing, enhancing the platform's management and leadership-related content with a selection of curated courses to enrich both personal and professional skills, as well as through the enrichment of the educational offer on products, brands, and lens innovations. Thanks to 'Latest Collections', the interactive online catalogue that provides a comprehensive overview of every style in EssilorLuxottica's eyewear collections, and 'The Highlights' Leonardo gives access to storytelling, inspiration, support for advertising campaigns, and key technical details of every eyewear collection. At the same time, Leonardo has been one of the key levers of success for the lens innovations launched throughout the year, such as Transitions GenS, for which dedicated content and market specific deployment plan have been put in place. The vision care educational offer has also been enriched with content on vision solutions such as Nikon, Kodak and Shamir.

To reinforce the connection with learners and foster a sense of community globally, Leonardo organized global live events open to all EssilorLuxottica employees and partners to celebrate industry or globally renowned international days throughout 2024, marking an exclusive and unique service available only on Leonardo.

Based on the experience gained in 2023, Leonardo has continued the roll out of the Build Your Career path in several countries throughout the year, aiming to complete it in 2025. Build Your Career is the ultimate section designed to help independent practitioners to upskill their staff and strengthen their knowledge in order to be recognized by patients as trusted optical practice members. This section offers structured programs that accompany the staff in their personal and professional development, whether they are new to the industry or experienced professionals.

2024 also marked the opening of the first Leonardo physical Educational Center in France: Leonardo@Créteil. Since its opening in April, it has welcomed professionals from the Company's professional solutions network in France, helping them develop their skills as experts in visual health with technical, sales and management training sessions. By obtaining Qualiopi quality certification, Leonardo@Créteil allows participants to co-finance their training with public funds (OPCO), guaranteeing greater accessibility to the programs.

Sustainability-related topics in general are part of the engaging portfolio offered by Leonardo from which employees can retrieve material to increase their awareness. Indeed, the hours of education on sustainability topics delivered in 2024 represent around 13% of the total hours delivered on the platform, to both internal and external audience.

In 2024, the adoption of Leonardo grew strongly: 3.4 million hours of education have been delivered to employees and external networks, which represents a growth of +25% compared with 2023[1]. 18,639 live sessions have been organized with the participation of over 1 million people, reaching a total number of 70,500 sessions since the launch and a total number of over 3.4 million participants.

Hours of Education and Number of Employees Educated

	2024	2023
TOTAL HOURS OF EDUCATION DELIVERED TO EMPLOYEES	**4,460,342**	**3,684,658**
Number of employees educated through centrally managed programs	145,350	132,587
Number of employees educated through locally managed programs	92,184	84,662

Note: In 2024, a total of 4.5 million hours of education were delivered across the Group. Of this, over 2.4 million hours were centrally managed and provided to employees globally through Leonardo, achieving a record high and reporting a 14% increase compared to 2023. A key driver of this growth was the launch of the Competency Hub, a dedicated space enabling employees to explore the new Competency Model through a customized experience tailored to their individual needs. Over 145,000 employees were educated through Leonardo, marking a 10% increase compared to 2023. On the locally managed side, over 1.9 million hours of education were delivered to more than 92,000 employees, representing a 24% increase in hours and a 10% rise in the number of employees educated compared to 2023, emphasizing the strength and reach of the ecosystem. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

3.1.4.14 Targets and metrics

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

- talent management: the 2024 OnePerformance cycle expanded its scope by 19% compared to 2023, involving around 56,000 employees. As of December 31, 2024, the global goal-setting completion rate for 2024 was at 94% surpassing the 2023 rate by 5%. In the future, EssilorLuxottica is committed in enlarging the number of employees involved in Performance Management process year over year.
- talent development: global talent initiatives engaged over 1,500 individuals worldwide, driving diversity and growth. In the future, EssilorLuxottica aims to enlarge the number of employees involved in the Global Development initiatives year over year.
- talent attraction: the Operations Talent Program (OTP) expanded globally in 2024. Women represented 47% of the participants across the 2023 and 2024 editions.
- Leonardo and education: 4.5 million hours of education have been delivered to employees, which represents a growth of +20% compared with 2023. Roll out of the Build Your Career path in several countries throughout the year, aiming to complete it in 2025.

[1] *The 3.4 million hours delivered in Leonardo represent the total reach across the full target audience perimeter, including external networks – both in professional solutions and among optical students and boutiques. In contrast, the hours shown in the table 'Hours of education and number of employees educated' reflect only internal adoption, covering the entire EssilorLuxottica employee network and are comprehensive of centrally managed Leonardo education and locally managed programs.*

3.1.5 Diversity, Equity & Inclusion

3.1.5.1 Introduction

EssilorLuxottica is deeply dedicated to fostering an inclusive environment where equal opportunities are accessible to every employee, at every level. The Group ensures equal pay for equal work, free from distinctions based on race, gender, age, nationality, religion, sexual orientation, political views, marital status, union membership, or disabilities. Guided by its Code of Ethics, EssilorLuxottica strictly prohibits discrimination, harassment, or intimidation of any kind.

The Company prioritizes cultivating a diverse and inclusive workplace where individual perspectives and innovative ideas thrive. Career opportunities and advancements are determined through a lens of fairness and meritocracy.

With a presence in over 150 countries, the Group proudly reflects a global community, enriched by a variety of cultures, identities, and languages. The workforce embraces talent across all backgrounds, striving to ensure that every employee feels valued, supported, and inspired in their professional journey.

3.1.5.2 Material impacts, risks and opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Diversity Equity and Inclusion	Efficiencies related to promoting diverse and inclusive environment	Promoting a diverse and inclusive environment creates opportunities for increased efficiency and growth. Ensuring gender equality and equal pay, as well as employment and inclusion of persons with disabilities, expands the talent pool, fosters innovation, and enhances employee satisfaction. Prioritizing diversity helps the organization better connect with global markets, while measures against violence and harassment ensure a safer workplace, boosting engagement and reducing risks. Overall, these practices lead to higher productivity, better decision-making, and stronger financial performance.	• Code of Ethics • Global Diversity, Equity, and Inclusion (DE&I) Policy • SpeakUp platform + Group Reporting Policy • Global Policy on anti-harassment and discrimination • Global Policy on Salary Review	• 40% women in leadership roles by 2029 (Rixain Law) • 50% women in leadership programs in 2024 and same target for 2025 • 100% Group CEO and Deputy CEO first line involved in inclusive leadership training in 2024 and same target for 2025

3.1.5.3 Policies and processes

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

As part of the 'Policies and Processes' pillar of the Company's DE&I strategy, DE&I principles have been integrated into key stages of the employee lifecycle. The Group has established internal policies and procedures covering DE&I, Anti harassment and discrimination, Talent Acquisition, Employer Branding and Talent Attraction, Onboarding, Performance Management and Development, as well as Well-being and Engagement.

These policies reaffirms the Company's commitment to conducting its activities in full compliance with legal requirements at both international and local levels. The policies aim to safeguarding Human Rights and promoting principles established by international organizations, including the 2030 Agenda for Sustainable Development and its related Sustainable Development Goals (SDGs), the United Nations Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organization (ILO), and the OECD Guidelines. These principles are implemented through organizational frameworks, external engagement initiatives, and specific internal tools. The Chief People Officer and their direct reports are ultimately responsible for ensuring the proper implementation of these policies. All these policies were developed with the support of technical experts and in collaboration with local HR teams to ensure compliance with local legislation and alignment with the needs of all regions. Internal policies are accessible to employees via the company intranet or can be provided upon request to the HR Admin.

Document	Key content	Function	Scope	Availability
Code of Ethics	EssilorLuxottica is firmly committed to guaranteeing equal opportunities for every employee at all levels, and paying employees equally for the same work, regardless of race, gender, age, nationality, religion, sexual or political orientation, marital status, union affiliation, or disability. The Group does not tolerate any form of discrimination, intimidation or harassment.	Compliance	Own operations	Public
SpeakUp platform + Group Reporting Policy	The SpeakUp platform is guided by the Group Reporting Policy, is available 24/7 in 19 languages and supported by hotlines in 11 countries, to report violations such as corruption, Human Rights issues, moral or sexual harassment, discrimination, violence at the workplace, labor laws, Health & Safety concerns, fraud, and more. The Group Reporting Policy (whistleblowing) ensures confidentiality, allows anonymous reporting (where legally permitted), and prohibits retaliation.	Compliance/ Human Resources	Value chain	Public
Global Diversity, Equity, and Inclusion (DE&I) Policy	The policy outlines the Company's principles and commitments in DE&I areas and focuses on: • key processes for integrating DE&I principles, including Employer Branding, Talent Attraction and Acquisition, Onboarding, Performance Management and Development, Salary Equity, Engagement and Well-being, Prevention of all forms of abuse, and Support for Parenthood and caregiving; • main dimensions driving the DE&I agenda, such as Gender Equality, Gender Identity and Sexual Orientation, Parenthood and caregiving, Age and Generations, Disability, Ethnicity, Religion, and Culture. The policy is drafted with reference with international principles, including the SDGs, the UN Universal Declaration of Human Rights, ILO conventions, and OECD Guidelines.	Human Resources	Own operations	Public
Global Policy on anti-harassment and discrimination	This policy affirms the Company's zero tolerance for any form of discrimination or harassment, ensuring a workplace where all employees are treated with dignity, respect, and fairness. It underscores the commitment to fostering an inclusive and equitable environment free from bias, intimidation, or misconduct.	Human Resources	Own operations	Internal
Global Policy on Salary Review	This policy outlines the guidelines and procedures for the annual salary and promotion process, aiming to attract, retain, and motivate high-performing employees. It ensures equity, transparency, and alignment with company goals, upholds the principles of equal pay and performance-based rewards through the 'OnePerformance' framework, and promotes a merit-based culture.	Human Resources	Own operations	Internal

Inclusion Committee

In 2024, EssilorLuxottica introduced an Inclusion Committee dedicated to championing diversity, equity, and inclusion within the organization.

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

Its main responsibilities are:

- Awareness and Accountability

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

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

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

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

During its first year, the Inclusion Committee has validated EssilorLuxottica's DE&I strategy. The Committee members were also involved in an awareness session on Inclusive Leadership before its deployment to the Company's top leaders worldwide.

Employee training on non-discrimination policies and practices

In 2024, the Group enhanced awareness on DE&I through a global inclusion calendar featuring five key moments throughout the year and dedicated internal and external communication campaigns. Specific DE&I dimensions and topics were addresses by internationally renowned speakers and experts during virtual classrooms on the Leonardo platform, and in some cases, they were complemented by local events in Italy, France, and other regions.

Furthermore, in North America, EssilorLuxottica continued many employee-led initiatives, including the DE&I Think Tank and six Business Resource Groups (BRGs) (Women's Network, Kaleidoscope, Pride, Abilities, Generation Next, and MilVets). EssilorLuxottica also continued its long-standing partnership with the Optical Women's Association and established new partnerships with multiple professional non-profit organizations, such as Black EyeCare Perspective, Out & Equal, and DisabilityIN.

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

In Italy, during November, awareness sessions were held to prevent, recognize, and address harassment and gender-based violence. These sessions were specifically aimed at all people managers in Italy. Additionally, activities were organized to raise internal awareness about violence against women in all its forms, and the HR Department received specialized training on the topic.

Throughout the year, all regions (EMEA, North America, Latin America and APAC), in alignment with the global agenda, organized workshops, training, and awareness sessions, also involving leadership teams.

As part of the awareness pillar of its DE&I Strategy, the Group also implemented comprehensive training for the HR community. Globally, Regional HR representatives received 'Train the Trainer' sessions on the importance of inclusivity, addressing unconscious bias, and combating discrimination. In Italy and France, most HR functions underwent training on confronting unconscious bias and understanding its impact on their work with employees. Additionally, specific HR functions in Italy received initial training on supporting situations of violence and harassment.

Grievance and Whistleblowing mechanisms

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

When this does not seem possible, employees can use the Group's SpeakUp reporting tool, which is described more in detail in Sections 4.1.5.1 *SpeakUp reporting system* and 3.1.6.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns.*

3.1.5.4 Actions and resources

In October 2022, as a part of coming together as one organization, a Global DE&I function was created to establish the Group's strategy, commitments and goals for Diversity, Equity and Inclusion. The pillars of the Global DE&I strategy are: to Drive Internal & External Awareness by fostering a culture of Inclusivity & belonging, Build & Evolve More Inclusive Processes and Policies, Develop Clear Goals by Leveraging Data & Metrics, Ensuring Diversity of Thought through Ambassadors and Regional Networks.

DE&I initiatives are developed in partnership with Corporate Sustainability, Corporate Communications, Leonardo, and all EssilorLuxottica employees.

As part of the company's strategy, the awareness pillar aims to foster a more inclusive culture by enhancing understanding of diversity. To achieve this, the Company annually celebrates a dedicated inclusion calendar featuring key occasions that delve into various diversity dimensions through educational and engaging events worldwide, as well as awareness-raising communication campaigns.

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

The Company is also working to integrate DE&I into key processes and policies to promote unbiased decision-making. In this respect, the Global DE&I Policy and the establishment of the Inclusion Committee represent a significant milestone.

To track progress with a data-driven approach, the company measures targets and metrics through KPIs and dedicated dashboards.

Global DEI Strategy

Awareness pillar

In alignment with a dedicated Global Inclusion Calendar, EssilorLuxottica marked key occasions such as International Women's Day, Mental Health Awareness Month, Pride Month, Diversity, Equity, and Inclusion Week (centered on Building Bridges through Dialogue), and the International Day of Persons with Disabilities. These initiatives were celebrated through global campaigns on Leonardo and at local levels, engaging the entire workforce and customers through a mix of virtual and in-person events, workshops, and the distribution of educational and awareness materials. These efforts fostered a deeper understanding among employees about unconscious biases, gender equality, and the multifaceted nature of diversity in the workplace.

The 2024 Inclusion Calendar featured:

- International Women's Day (March)

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

  This year, under the theme 'Together, we can all Inspire Inclusion' the Group hosted both global livestream events about women's achievements and challenges and local initiatives engaging employees worldwide.

- Mental Health Awareness Month (May)

  The stigma around mental health can lead to feelings of shame and solitude, preventing those experiencing these challenges from sharing their experiences openly or seeking the necessary support. In May, under the campaign 'Let's break the stigma' the Group shined a spotlight on the importance of mental health, with global live streaming sessions and local awareness initiatives.

- Pride Month (June)

  In 2024, with the theme 'Together in Pride', thanks to global livestream events the Group explored the history, significance and evolution of Pride Month, and the importance of allyship and representation. Many countries including Italy and France also hosted celebrations in offices worldwide, together with brands' and banners' network.

- Diversity, Equity and Inclusion Week (October/November)

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

  The initiative, at its second edition in 2024, focused on bridging cultural and generational dialogue and the importance of inclusive language. Through a global interactive panel and local engaging workshops, and thought-provoking discussions, employees were encouraged to share their experiences and learn from one another, promoting a culture of openness and mutual respect.

  In addition, the newly established Inclusion Committee and top leaders actively participated in this awareness journey.

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

  In recognition of the International Day for the Elimination of Violence against Women, the Group launched a special awareness session dedicated to all People Managers in Italy on the topic 'Recognizing, Preventing, and Tackling Harassment and Gender-Based Violence' seeing the participation of more than 800 managers from different business functions. The session was also the chance to explain the commitment of the Group to this topic and promoting the internal reporting tools.

  Also, in Italy EssilorLuxottica has been recognized as an Inspiring Company by Fondazione Libellula, an organization dedicated to promoting gender equality and combating gender-based violence in the workplace.

- International Day for People with Disabilities (December)

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

Processes and Policies pillar

Its key features are:

- establishment of the Inclusion Committee;
- gender Equality Certification in Italy UNI PdR 125:2022 (obtained in 2024);
- global DE&I Policy;
- new set of policies integrating DE&I principles.

Goals and Data pillars

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

The Group is dedicated to fostering inclusivity across various dimensions of diversity with a holistic approach, ensuring that every individual feels respected and has a sense of belonging.

As outlined in the Global DE&I Policy, the Group is committed to gender equality by providing equal opportunities, fair pay, and career advancement for all while supporting work-life balance through parental leave and policies that address gender-based discrimination and harassment. The Group nurtures a supportive environment for individuals of all gender identities and sexual orientations, promoting awareness, allyship, and the removal of barriers through global and local initiatives.

Generational diversity is embraced as a driver of innovation, encouraging knowledge sharing and collaboration across age groups through intergenerational dialogue, awareness initiatives, and dedicated development programs. The Group also strives to include and support employees with disabilities by creating accessible workplaces and mainly raising awareness and promoting the elimination of social biases.

Also, awareness and respect for ethnic, cultural, and religious diversity are integral to the company's approach, celebrating the unique contributions of every individual.

Recognizing the diversity of its global workforce, EssilorLuxottica tailors its initiatives to the specific characteristics and legacies of each region. While maintaining a strong focus on gender equality, the Group is also addressing other dimensions of diversity, aligning with emerging needs.

3.1.5.5 Targets and metrics

Targets

- 40% Women in Management and Senior Executive roles by 2029, in line with Rixain Law (baseline 35% in 2024 – Rixain Law specific categories).
- 50% Women in global leadership development programs achieved in 2024, with the same target for 2025.
- Inclusive leadership training for 100% of the Group CEO and Deputy CEO's first line in 2024, with the same target for 2025.

At December 31, 2024, Women represented 35% of the Management Bodies and 35% of Senior Executives (both categories contribute to the total Executives-Senior Management line in the table below)[1].

The composition of the Management Bodies encompasses the key global positions within Group Functions and Senior Business Leader with large business responsibility. The list evolved as a result of the ongoing integration effort and the harmonization of the HR systems, that allowed a higher uniformity and quality of data. This process also entailed an internal global alignment on the most selective definition of Management bodies within the Group, reflecting the continuous evolution of EssilorLuxottica and of the key global strategic positions needed to ensure its growth and success.

Senior Executives encompasses employees who directly contribute to the definition of the company strategy and who play roles with high level of autonomy and decision-making power and coordinates teams pursuing these objectives.

[1] *The Executives-Senior Management category includes Management Bodies and Senior Executives roles, with a more narrowly defined baseline to align with the requirements of the Rixain Law.*

The tables below present additional diversity metrics, such as gender distribution by job category and employee distribution by age groups.

Metrics

Employee breakdown by category & gender

	2024		2023	
TOTAL NUMBER OF EMPLOYEES	195,428	100%	191,706	100%
EXECUTIVES – SENIOR MANAGEMENT	**2,775**	**1%**	**2,582**	**1,3%**
Female	938	34%	863	33%
Male	1,829	66%	1,719	67%
Unknown	7	-%	-	-%
Other	1	-%	-	-%
MANAGERS/EXPERTS – MIDDLE MANAGEMENT	**12,933**	**7%**	**12,520**	**7%**
Female	5,669	44%	5,362	43%
Male	7,208	56%	7,139	57%
Unknown	45	-%	19	-%
Other	11	-%	-	-%
PROFESSIONAL – WHITE COLLAR	**37,881**	**19%**	**38,920**	**20,3%**
Female	20,437	54%	20,869	54%
Male	17,285	46%	17,975	46%
Unknown	148	-%	76	-%
Other	11	-%	-	-%
PRODUCTION/SHOP STAFF – BLUE COLLAR	**141,839**	**73%**	**137,684**	**72%**
Female	90,392	64%	88,102	64%
Male	49,803	35%	47,975	35%
Unknown	1,627	1%	1,607	1%
Other	17	-%	-	-%

Note: The figures for EssilorLuxottica workforce refers to December 31 of each year. The table reflects data excluding 2024 latest acquisitions (Heidelberg Engineering and Supreme). The Group's job level categories remain consistent with those of 2023. Production/Shop staff (i.e., Blue Collar) represent 73% of the workforce, primarily in retail and operations. Females account for 44% of middle management, showing an increase compared to 2023. The proportion of female in Executive-Senior management roles has also slightly increased from 33% to 34% in 2024. Executives-Senior Management category includes Management Bodies and Senior Executives, and other senior roles across all regions. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

Head count by age group

	2024	
TOTAL NUMBER OF EMPLOYEES	195,428	100%
below 18	507	-%
under 30	56,574	29%
30-50 years old	106,056	54%
above 50	32,291	17%

Note: The figures for EssilorLuxottica workforce refers to December 31 of each year. The table reflects data excluding 2024 latest acquisitions (Heidelberg Engineering and Supreme). EssilorLuxottica has a strong youth employment rate, with around 30% of employees under 30, primarily in facilities and stores. Overall, 83% of employees are under 50, and the average age is 38. For further information on reporting methodology and scope, please refer to Section 5 Methodology Note.

3.1.6 Human and Social Rights of Own Workforce

3.1.6.1 Introduction

As stated in the Code of Ethics, EssilorLuxottica is firmly committed to respecting Human Rights and labor rights of people in its own workforce. EssilorLuxottica is an equal opportunities employer, for every employee at all levels, and paying employees equally for the same work, regardless of race, gender, age, nationality, religion, sexual or political orientation, marital status, union affiliation, or disability. The Group does not tolerate any form of discrimination, intimidation or harassment. The Company is firmly committed to building a work culture that is inclusive, and nurtures diversity to allow unique perspectives and novel ideas to flourish.

3.1.6.2 Material impacts, risks and opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Human and Social Rights of own workforce	Potential inadequate Human Rights practices	Inadequate Human Rights practices or lack of processes and mechanisms to monitor compliance with the Company's Code of Ethics and Human Rights regulations and principles can damage the company's reputation as an employer (making it difficult to attract and retain skilled talents) and as a trustworthy business partner for both suppliers and clients.	• Code of Ethics	• Number of allegations

3.1.6.3 Policies

Document	Key content	Function	Scope	Availability
Code of Ethics	EssilorLuxottica's Code of Ethics, endorsed by the Chairman and Chief Executive Officer and by the Deputy Chief Executive Officer, contains a whole section about the respect of people and communities, and includes the Group 'key principles' and 'golden rules' in relation to human and labor rights across its operations, such as secure employment, working time, adequate wages, social dialogue, freedom of association, work-life balance, Health & Safety, gender equality and equal work for equal pay, training and skills development, employment and inclusion of people with disabilities, measures against violence, discrimination and harassment in the workplace, diversity, child or forced labor, privacy and personal data. The Code of Ethics applies and is binding to EssilorLuxottica, its subsidiaries and all their employees. EssilorLuxottica applies similar principles to temporary and seconded staff of external companies. For more details, please refer to disclosure in Section 4.1 *ESRS G1 – Business Conduct*.	Compliance	Own operations	Public

The Group's ethical commitment is in line with the provisions of International Labor Organization (ILO) Conventions and the principles of United Nations Global Compact on Human Rights. The Company places particular importance on respect for Human Rights and the environment, along with applicable laws and regulations (e.g., the French 'Duty of Care' law) and international standards, such as the United Nations Guiding Principles for Business and Human Rights, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Generally speaking, EssilorLuxottica aims to ensure that its activities comply with the International Bill of Human Rights and the principles of fundamental rights set out in the Declaration on Fundamental Principles and Rights at Work of the ILO.

EssilorLuxottica's Code of Ethics explicitly prohibits trafficking in human beings, forced labor or compulsory labor and child labor, including for temporary staff. 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.

In relation to child labor, hiring of individuals 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, except for trainees and apprentices as the Group believes that hiring trainees or apprentices is important for the development of future talents, as part of their curriculum. Hiring of individuals (either employees or temporary staff) below 18 years of age for positions involving hazardous work is also strictly prohibited. These categories of workers must be protected and EssilorLuxottica's policy ensures that they are not subject to long hours interfering with their education and that their mission is strictly related to their education.

EssilorLuxottica maintains a very high level of vigilance and proactivity, with action plans on, among others, Human Rights and business ethics, including programs on anti-bribery and corruption, privacy compliance. The vigilance system is reinforced by the implementation of the internal reporting tool, SpeakUp, which is open and publicly accessible to employees and other stakeholders. SpeakUp allows employees in the workforce to report incidents related to Human Rights and labor rights, which are clearly identified in the list of issues that they can select – please refer to Section 3.1.6.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns* for more details.

3.1.6.4 Processes for engaging with own workers and workers' representatives

EssilorLuxottica constantly works to anticipate and manage the actual and potential impacts on its workforce deriving from potential inadequate human right practices that can damage the work environment and also jeopardize the Group's reputation. For this reason, the Group seeks to get feedback from its workforce through several actions such as employee survey and the internal reporting channel, which informs actions and procedures to address the issues raised.

Moreover, respecting local regulations, EssilorLuxottica acknowledges the value of engaging with Factory Committees and Trade Unions as an added dimension for sustainable business growth through participative means. As explained in Section 3.1.4 *Social Dialogue and Freedom of Association*, EssilorLuxottica regularly engages with employee representatives as per local applicable laws. Indeed in France and Italy, the Code of Ethics was presented to work councils. From an operational perspective, policies and procedures regarding Human Rights and labor laws are overseen by different teams: Human Resources, Compliance, Environment, Health & Safety, the Global DE&I function and finally a dedicated Human Rights procedure is under definition. More details in the Sections 3.1.2 *Employee Engagement & Well-Being*, 3.1.3 *Health & Safety*, 3.1.5 *Diversity, Equity & Inclusion*.

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

The CSR Committee is regularly updated on specific topics including the Double Materiality assessment and management of sustainability issues. The CSR Committee also coordinates with the Audit and Risk Committee for all matters related to the CSR Committee's areas of intervention. In addition, the Environment, Health & Safety function at EssilorLuxottica is responsible for the deployment of environmental management systems aimed at reducing environmental impact and ensuring the Health & Safety of all employees worldwide.

EssilorLuxottica carries out its activities in more than 150 countries in varied economic and sociocultural contexts, which may present risks relating to Human Rights and the environment. Identifying, assessing and managing these risks is an integral part of EssilorLuxottica's corporate culture and is strengthened over time. EssilorLuxottica assesses its risk exposure through the Group risk assessment process, which incorporates the identification and evaluation of ESG risks such as Health & Safety, and through specific programs that apply to both manufacturing sites and suppliers globally. Risk mapping has helped to raise awareness and prioritize action plans at both corporate and regional levels. For each main risk family, the functions involved coordinate the most appropriate approach in a continuous improvement process.

The processes for providing or contributing to remedy negative impacts include a whole set of corrective actions, either individual or general, such as:

- discussion with Human Resources and manager (or the upper-level manager) to discuss the matter at stake and recommended actions, proportionate to the negative impact;
- coaching and/or specific training of the employees involved;
- reminder of the applicable policies to the employees involved ('reset expectations');
- enhancement of the existing training to the exposed part of the workforce;
- review and enhance of the policies and procedures, if necessary;
- interim measures such as suspension of an employee during investigation;
- internal reorganization such as change of department or new store affectation;
- disciplinary measures, from verbal or formal warning, up to termination of employment.

Moreover, to prevent or mitigate material negative impacts on its own workforce, the Group has also put in place different types of audits, both internal and external, in order to ensure that appropriate working conditions are implemented in the different entities of the Group:

- external audits: different audits are performed on a yearly basis by external auditors in the Group's major manufacturing sites and prescriptions laboratories. Group's sites can be audited either as part of SMETA expectations or as part of the EssilorLuxottica Responsible Sourcing and Manufacturing program (ELRSM). This program aims at verifying the compliance of the Group's value chain (including own operations) to international standards, all applicable laws and regulations and the Group Code of Ethics. ELRSM audit checklist is composed of four main sections that refer to Labor & Human Rights (including among other topics working hours, wages and benefits, child and forced labor, freedom of association and collective bargaining), Occupational Health & Safety, Environment and Governance and Ethics. Each section is composed of multiple questions and there is clear evidence of those that are essential for EssilorLuxottica. Zero-tolerance criteria are clearly expressed (e.g., employment of children under 16 years of age, retention of workers' passports or other identification papers, working time systematically recorded, etc.);
- internal audits on a wide range of topics (training, Health & Safety, etc.) are conducted both at operations/production site level or at store level depending on the audited topics.

For both cases audited sites are selected based on a risk assessment methodology that considers the following main criteria:

- country risk profile/external third-party index;
- headcount numbers;
- audit cycle/results of previous audits;
- internal Control System: the Internal Audit Department and Risk Management department performs interviews at corporate and local level with the key stakeholders to ensure that full business and risk perspective is obtained;
- insights from the Enterprise risk management process.

After each audit, ad-hoc action plans are defined between the auditors and the associated involved functions to correct the identified improvement points. In 2024,17 audits have been performed either covering around 14% of EssilorLuxottica's global headcount.

Moreover, EssilorLuxottica encourages a culture of dialogue and communication, and attaches particular importance to ensuring that all employees have the means to report ethical breaches. Given the size of the Group, its geographical presence and the multiplicity of applicable regulations, several channels are in place for EssilorLuxottica's employees to raise concerns:

- the Group has an Open Door approach and encourages employees to speak up to their manager higher-level manager, or the human resources department;
- EssilorLuxottica respects the principles of freedom of association and collective bargaining. In several countries, EssilorLuxottica has work councils, unions or employee representatives to whom employees can raise concerns;
- where applicable, certain entities have written grievance procedures in place, for example via e-services on internal portals;
- employees can use the Group's SpeakUp reporting tool (more details below). Where applicable, like in North America, SpeakUp can also be used for grievance purposes notably for employees who want to report anonymously, outside of the e-service portal;
- EssilorLuxottica is considering extending the use of the SpeakUp platform for grievance in other regions or for specific matters, notably in anticipation of the CS3D;
- in the European Union, employees have the possibility, as an alternative to the internal Group reporting (whistleblowing) system, to raise their concerns to external agencies designated by each member state. Employees are informed of this possibility in the Group Reporting Policy.

The SpeakUp tool is hosted on third-party vendor platform which enables case management and tracking of incidents. All the cases are identified with a case number, and several metrics can be tracked including the case opening and closing dates, the date of incident, the follow-ups, as well as the case history (appointment of investigator, notifications sent, etc.). The system contains reporting and analytics features enabling the issuance of detailed reports. All entities of the Group have been set up in the system and organized by region, so it is possible to obtain precise analytics by region, country.

EssilorLuxottica strives to comply with the timeframes set out in the Directive on the protection of whistleblowers which are also clearly set out in the Reporting Policy. SpeakUp is being rolled out across Group entities – which may have diverse internal channels of reporting – thanks to both global (global communication on the Group intranet and specific actions with key managers, distribution of FAQs) and local (specific deployment with subsidiaries, dedicated posters, digital animations, etc.) communication initiatives. Investigations are conducted by trained investigators with the support, as necessary, of relevant subject matter experts. The outcomes of the procedures comply with applicable laws and internationally recognized Human Rights and disciplinary procedures, if necessary, must comply with applicable labor laws. More details in Section 4.1.5.1 *SpeakUp reporting system*.

Throughout the SpeakUp process, EssilorLuxottica identifies insights that support continuous learning in both improving the channels and preventing future impacts. For example, the Compliance department continuously improves its investigator training, its investigation process and templates, thanks to the experience acquired through the handling of cases. As part of the actions to be taken further to the closing of a case, EssilorLuxottica adapts, reinforces or corrects gaps in the policies and procedures. For example, specific anti-harassment training was provided in 2024 to certain categories of retail managers, following cases received through SpeakUp or through other channels.

EssilorLuxottica determines the outcome of whistleblowing cases based on facts, as part of its management decision power, taking into account, wherever possible, the reasonable expectations of the reporters.

It is difficult to measure the effectiveness of SpeakUp using indicators. As SpeakUp was rolled out worldwide in 2024, with widespread communication, an increase in the number of cases was expected and has been achieved, particularly in regions where previous systems were not in place. In some regions, the system is more mature and employees are making extensive use of it. It is still too early to measure its effectiveness, but it is clear that it has revealed and corrected situations that are contrary to the Group's values. EssilorLuxottica has a non-retaliation policy that is clearly stated in its Reporting policy, in the Code of Ethics and related training, in the SpeakUp posters displayed in the Group's premises and in the Group's policies on Diversity and Inclusion and on Discrimination and Harassment.

Data privacy and data protection are priority action areas for the Group, that takes steps to comply with applicable regulations to help ensure the protection of data, moreover a privacy compliance program and training courses were created and dedicated functions support the business in implementing data protection where relevant. More details in Section 3.4.3.6 *Actions and resources*.

3.1.6.6 Actions and resources

EssilorLuxottica attaches particular importance to identifying risks and preventing serious breaches of Human Rights and fundamental freedoms, Health & Safety at work (referred to below as 'Human Rights'), as well as the environment. These risks can arise as a result of its activities, those of its subsidiaries or those of its suppliers and subcontractors, regardless of their position in the value chain. Identifying those risks entails a commitment to make every reasonable effort and undertake the necessary measures to guarantee compliance. Actual or potential violations to the duty of vigilance can be reported through the Group alert system.

The Group responds proactively to risks related to potential Human Rights violations through initiatives designed to improve safeguards and reinforce the existing system. External and internal audits are performed on EssilorLuxottica's own operations. The topic is also covered in both the Group's Code of Ethics and the new Business Partners' Code of Conduct.

Regular awareness-raising and training initiatives delivered to employees on Human Rights and compliance-related topics (Code of Ethics, personal data protection, Health & Safety policies etc.) are organized via dedicated e-learning modules and face-to-face training. A new 'Code of Ethics' training was launched in Q2 2024 and was completed by 18,558 white collar employees as at 31 December 2024. The training effort will be continued in 2025.

EssilorLuxottica also focuses on privacy and personal data training, and specific training was provided to specific functions that may impact the workforce, notably human resources, facility management or Asset Protection – please refer to Section 3.4.3.6 *Actions and resources* for more details.

In 2024, EssilorLuxottica implemented the following actions to mitigate the potential negative impact from inadequate Human Rights practices:

- deployment of its Code of Ethics and the related training within the Group, covering all the areas of the Code of Ethics (including the SpeakUp platform and the Open Door approach);
- deployment of the SpeakUp program;
- drafting of a new Human Rights policy to be launched in 2025;
- launch of a Human Rights task force to anticipate the implementation of CS3D;
- drafting and launch of new policies including Diversity and Inclusion policy;
- implementation of new privacy trainings and continuous enhancement of the privacy notice for both employees and candidates.

EssilorLuxottica addresses seriously gaps and issues that have an actual material impact on its workforce:

- appropriate individual actions are being taken on a day-to-day basis to remedy actual material impacts, where required, up to and including termination of employment;
- harassment and discrimination: further to SpeakUp or Human Resources cases revealing situations not in line with the Group's Code of Ethics, specific training was conducted and the anti-harassment policies of the Group were strengthened;
- wages – miscalculation of overtime: corrective actions taken to remedy a miscalculation raised via Human Resources or SpeakUp.

The key actions planned for 2025, and beyond, in relation to Human Rights and labor rights in the workforce are aligned with the upcoming implementation of the CS3D and refer to:

- enhancement of its Human Rights risk mapping and assessment process across its operations;
- update of the Group human right policy and development of the associated training.

3.1.6.7 Metrics and targets

Specific targets covering such ESG topic will be set in due course.

In 2024, EssilorLuxottica received 445 allegations of discrimination, harassment and/or bullying and sexual harassment in its internal reporting channel SpeakUp. The vast majority of such allegations were related to daily employee relations in the workplace, often including misunderstanding or miscommunication issues. At the date of this report, 37 of these allegations were substantiated and 67 were found partially substantiated, for example when an allegation may not strictly be qualified of discrimination or harassment, but is still a violation of the Group's values or Code of Ethics.

In total, the Group received 1,197 allegations in SpeakUp, in 2024. This number is a 32% increase compared to 2023, and is linked to the launch of SpeakUp in November 2023 and its broad internal advertising at the launch and during its roll out in 2024. None of these allegations had a significant financial consequences for the Group.

In 2024, EssilorLuxottica did not record any complaint filed to the OECD, or severe Human Rights issues and incidents connected to own workforce that are cases of non respect of UN Guiding Principles and OECD Guidelines. Indeed, to best knowledge of EssilorLuxottica, no severe Human Rights issues and incidents have occured and no related fines and penalties occured.

3.2 ESRS S2 – Workers in the Value Chain

3.2.1 Introduction

While being vertically integrated, EssilorLuxottica has a comprehensive supply chain and aims to lead by example being a leader in the eyecare and eyewear industry. The Group bases its success on the proper consideration of local impacts, dialogue with stakeholders and the creation of shared value with business partners, suppliers, governments and local communities. The establishment of EssilorLuxottica sites provides access to meaningful jobs in a buoyant sector and generates significant direct and indirect income.

The Group Business Partners' Code of Conduct applies to all its business partners everywhere and in every circumstance, making it a solid base for fair and honest collaboration. EssilorLuxottica seeks to work with suppliers whose operational practices comply with applicable laws and regulations and, more generally, that protect the dignity of human beings, the Health & Safety of workers, and the environment at large.

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

3.2.2 Material Impacts, Risks and Opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Working condition and Human Rights in the value chain & Equal treatment and opportunities for all	Inappropriate working conditions, unequal treatment and Human Rights practices for business partners' employees	Inappropriate working conditions, unequal treatment, or lack of Human Rights practices for business partners' employees including inadequate safety measures, excessive working hours, and insufficient wages jeopardize the health and well-being of workers.	• Business Partners' Code of Conduct • Code of Ethics • EssilorLuxottica Responsible Sourcing & Manufacturing (ELRSM) program	• Number of audits
	Collaborating with business partners not aligned with EL's ethical principles and standards	Potential lack of alignment or failure to comply with the Group's ethical principles and standards regarding fair working conditions and Human Rights could damage the Company's reputation, success and achievement of sustainability commitments and create legal liabilities for the Group. Stakeholders, including consumers, employees, shareholders and business partners, increasingly demand for transparency and accountability in supply chains; any association with partners engaging in unethical practices can lead to public backlash, diminished brand loyalty, and a loss of consumer trust while exposing the Group to legal risks and regulatory scrutiny.		• Number of critical non-conformities

EssilorLuxottica's commitment to responsible sourcing ensures that the material impacts of its operations across all sectors of its value chain are addressed. The Group recognizes that there may be high-risk supply chains in the eyecare and eyewear industry as well as in the apparel manufacturing, particularly manual labor-intensive processes – that require focused attention to safeguard the workers involved. These industries can be linked to systemic labor rights challenges, including forced labor, child labor, poor working and Health & Safety conditions, and low wages. EssilorLuxottica commits to ensuring that all workers potentially impacted by its operations are included in its disclosure. Through the Eyes on Ethics pillar of its sustainability program and the Responsible Sourcing program, the Company actively works with its suppliers and business partners to manage labor risks and ensure that workers' rights are upheld.

More precisely:

- third-party contractors' workers in the Group's facilities can be impacted by its operations. These workers include those engaged in the manufacturing sites, security and cleaning services, and temporary or seasonal labor. The Group ensures these workers are covered under the Code of Ethics and labor policies, ensuring fair treatment and adherence to worker welfare standards;
- EssilorLuxottica pays also close attention to the apparel, footwear, and accessories (AFA) supply chain. EssilorLuxottica works closely with suppliers to ensure these risks are mitigated, applying stringent due diligence and ethical certification standards to ensure that the extraction and processing of materials meet Human Rights and environmental sustainability standards.

In any case, as detailed in Sections 4.1.5.1 *SpeakUp reporting system* and 3.1.6.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns*, the Group has implemented specific initiatives to protect workers' rights, such as the reporting system SpeakUp that includes the possibility for business partners to report violations of the Code of Conduct anonymously and confidentially to EssilorLuxottica. This includes workers that may be at a higher risk of exploitation due to their inherent characteristics or particular circumstances (e.g., migrant workers, women, young workers, home workers, and trade unionists).

Regarding certain geographies, there are significant and widespread risks (e.g., child/forced labor) in certain parts of the upstream supply chain. In certain textile and garment manufacturing regions, forced labor in apparel factories is a major concern. EssilorLuxottica works to eliminate these risks through supply chain audits, third-party assessments, certification programs and collaborations with industry groups focused on preventing environmental and Human Rights violations in the supply chain.

3.2.3 Policies and Engagement

Document	Key content	Function	Scope	Availability
Business Partners' Code of Conduct	It reflects EssilorLuxottica's commitment to respecting and promoting Human Rights across its entire value chain as per the International Bill of Human Rights, International Labor Organization (ILO) Conventions, the United Nations Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. It sets its expectations from its business partners including suppliers, distributors, franchisees, consultants, agencies, service providers, outsourcing partners, hiring agencies, licensing partners, landlords and aims to ensure that they uphold the Company's commitment in areas of ethics, Human Rights and labour standards, environment, Health & Safety. EssilorLuxottica also expects its suppliers and subcontractors, to the extent possible, to ensure the application of this Code of Conduct or similar ethical standards to their own suppliers and subcontractors, and to take reasonable steps to cascade this Code of Conduct or similar principles to them. The document was created under the ownership of the Compliance function.	Compliance/ Sourcing & Procurement	Upstream and downstream	Public
Code of Ethics	The Code of Ethics outlines concrete principles on how the Group embeds and promotes ethical behavior in the interactions with all stakeholders. It is applicable to all Group employees and contains rules that must also be applied to workers in the value chain e.g.,: • prohibition of any form of discrimination, harassment, bullying, intimidation or violence; • fair competition; • zero tolerance principle for bribery and corruption; • protection of Human Rights and labour conditions. 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 ILO. The document was submitted and approved by the Chairman & CEO and the Deputy CEO of the Group.	Compliance	Own operations	Public
EssilorLuxottica Responsible Sourcing and Manufacturing program (ELRSM)	This program aims at verifying the compliance of the Group's value chain to international standards, all applicable laws and regulations and the Group's Code of Ethics. ELRSM audit checklist is composed of four main sections that refer to: • labor & Human Rights (including among other topics working hours, wages and benefits, child and forced labor, freedom of association and collective bargaining); • occupational Health & Safety; • environment; and • governance and ethics (e.g., bribery and corruption, whistle blowing procedures, etc.). Each section is composed of multiple questions and there is clear evidence of those that are essential for EssilorLuxottica. Zero-tolerance criteria are clearly expressed (e.g., employment of children under 16 years of age, retention of workers' passports or other identification papers, working time not systematically recorded, forced overtime, presence of deposit for employment, etc.).	Risk/ Sourcing & Procurement	Upstream value chain	Internal

EssilorLuxottica prevention of trafficking in human beings, forced labor or compulsory labor and child labor

EssilorLuxottica is committed to combatting any form of slavery or human trafficking. The Group has zero tolerance for forced labour, including unlawful child labor, in its own operations and in its supply chain.

As mentioned in its Business Partners' Code of Conduct, Business Partners must prevent and seek to eliminate any form of forced or compulsory labor, including child labor, in employment, as defined by ILO standards, and to require the same from their own contractors and subcontractors. The Group's Business Partners must safeguard and prevent infringement of domestic and migrant workers' fundamental rights and provide them with fair and decent working conditions. Any form of illegal or undeclared labor is also strictly prohibited. Business Partners must employ domestic and migrant workers in accordance with applicable labor and immigration laws, including when they are hired or employed through third party agencies. Besides, Business Partners must not hire individuals (either employees or temporary staff) under the age of 16 or under the legal minimum age for employment in the applicable country or jurisdiction, whichever is higher. In addition, hiring individuals (either domestic or migrant workers, or temporary staff) below 18 years of age for positions involving hazardous work or overnight shift is also strictly prohibited. Business Partners must set up appropriate procedures for age verification. When hiring trainees or apprentices, Business Partners must comply with applicable regulations, ensuring that they are not subject to long hours interfering with their education and that their mission corresponds to their skills and qualifications and enables them to achieve the diplomas they are working to attain. Besides, Business Partners should seek to prevent any harm toward local communities, notably by the preservation of cultural heritage and of environment and local biodiversity, by preventing forced evictions and displacement and helping indigenous people and affected communities to safeguard their environments and rights.

EssilorLuxottica Responsible Sourcing and Manufacturing program (ELRSM)

EssilorLuxottica is committed to respecting and promoting Human Rights in all its businesses across its operations and supply chain. Business partners are expected to commit to respect the human and labor rights of their workers and seek to comply with all applicable Human Rights and labor-related laws and conventions.

According to its Business Partners' Code of Conduct, EssilorLuxottica conducts risk-based due diligence and background checks on its Business Partners and may also submit them to self-assessment questionnaire and/or sustainability audits and on-site inspections, directly or by third parties, in order to verify the adequacy of their business with the principles mentioned in the Code of Conduct.

EssilorLuxottica has mostly focused on its upstream direct supply chain, notably through audits of its suppliers, with a specific attention and coverage of suppliers of its AFA (Apparels, Footwear and Accessories) division.

Indeed, supplier risk assessments and on-site audits are at the core of EssilorLuxottica's responsible sourcing program. To ensure this, qualified third parties support supplier compliance with the Company's ethical working principles as well as environmental and social responsibilities. This approach aims to prevent the risk of serious cases of noncompliance with sensitive topics, including child labor and use of forced labor and corruption, when selecting and monitoring suppliers.

- For supplier risk assessment, EssilorLuxottica is partnering with well-recognized sustainability ratings providers such as EcoVadis which assesses the social responsibilities of suppliers based on four axes: Environmental, Governance and Ethics, Labor & Human Rights, and Sustainable Procurement. Suppliers are risk assessed in terms of country and industry risk and classified in low, medium and high-risk suppliers. Based on the assessment results, either a sustainability assessment on EcoVadis or an on-site responsible sourcing audit is required. For suppliers with low and unsatisfactory performance ratings, a third-party on-site audit can be conducted, followed by a possible request to implement a corrective action plan. Results of the suppliers audits are mentioned in Section 3.2.4 *Actions and Resources*.
- For social and environmental supplier on-site audits, EssilorLuxottica is supported by third-party auditors in charge of assessing supplier compliance in line with the Company's standards and principles as well as local laws and regulations, and also to define corrective actions in the event of non-compliance. The audit plan is based on a yearly risk assessment. It includes notably EssilorLuxottica's Business Partners' criticality (in terms of country, industry and key sustainability risks), spending on suppliers, dependency, reputation impact, previous audit results (including date of last audit) and employee headcounts. It has to be noted that the criteria triggering audits are currently being reviewed and will be revised as per the enhanced Human Rights risk mapping to be conducted in 2025, in anticipation of the CS3D implementation.

EssilorLuxottica has categorized each checklist item as Essential or Aspirational criteria in its ELRSM Audit Operating Guidelines.These guidelines are internally available to directly involved stakeholders, and depending on the criticality of the issue, its importance for the business and whether the issue refers to key sustainability areas is defined. Aspirational issues do not lead to an audit non-conformity and do not need any corrective action whereas essential issues require corrective actions. Auditors must evaluate each checklist item with reference to various criteria and follow up with corrective action plans according to a matrix described in the Guidelines. Audit findings and related audit results are analysed according to a count-of-issue method, based on the severity and recurrence of the non-compliances. The rules/categorizations that lead to a negative outcome (failure) of the audit are shared with the auditees before scheduling the visit. In case of a non-conformity, the Company requests its suppliers to close all issues raised during the audit by an agreed deadline after the audit to make sure necessary remediation is put in place, giving priority to zero tolerance cases and non-compliances with local laws, international frameworks (e.g., ILO Conventions), and minimum recognized management practices (e.g., ISO standards). EssilorLuxottica works with its business partners in order to close the issues, as quickly as possible. Suppliers who do not meet the Company's requirements after a social and environmental audit, and refuse to implement the necessary corrective actions, or show no improvement and repeated issues across multiple audits could be evaluated for business interruption or reduction. In 2024, three business partner relationships have been terminated due to unsatisfactory responsible sourcing audit results. This mechanism is in place to guarantee appropriate monitoring of high-risk suppliers, ending with the definition of rules for re-auditing or re-qualification, as well as follow-up over the short term in case of audit failure and a two to three-year time frame in case of audit pass.

The existing initiatives and actions in delivering outcomes for value chain workers are tracked by the Responsible Sourcing function and presented on a regular basis to the ELRSM Steering Committee, composed by representatives of Sourcing, Internal Audit, Manufacturing, Quality, Risk Management, Compliance and Corporate Sustainability functions.

Non-respect of the International standards

EssilorLuxottica receives SpeakUp cases or complaints from value chain workers alleging non-respect of matters covered by international Human Rights instruments, as explained in Sections 4.1.5.1 *SpeakUp reporting system* and 3.1.6.5 *Processes to remediate negative impacts and channels for own workforce to raise concerns*. In 2024, 10 allegations from suppliers and 15 allegations from customers (mostly being consumer complaints to be handled by customer service) were received in SpeakUp, none of them having any material impact.

Cases of non-respect of the UN Guiding Principles on Business and Human Rights and ILO conventions may include:

- complaints or SpeakUp cases received containing harassment allegations made by subcontractors, in the upstream value chain;
- harassment and discrimination allegations in franchisees or customers, in the downstream value chain.

Engagement with workers in the value chain

At EssilorLuxottica, engaging with value chain workers and incorporating their perspectives is important to manage actual and potential impacts on their well-being and the sustainability of its value chain. This approach ensures that workers' insights inform decision-making and drive improvements in Group's operations and partnerships. Moreover, the approach aims to build trust, improve working conditions, promote fair labor practices, and ensure alignment with corporate values throughout the value chain.

EssilorLuxottica has several engagement mechanisms to gather worker perspectives and integrate them into its decision-making processes:

- **standards and policies**: enforcing the EssilorLuxottica Business Partners' Code of Conduct. All value chain partners are required to comply with these standards, which align with internationally recognized frameworks such as the UN Guiding Principles on Business and Human Rights and the ILO Core Labor Standards;
- **regular communication and dialogue:** factory visits, worker interviews, and focus group discussions as part of the responsible sourcing audits, help to understand value chain workers' needs, concerns, and aspirations. Feedback mechanisms are established, such as anonymous reporting systems (e.g., SpeakUp), enabling workers to report issues without fear of retaliation. Indeed, as per the EU Directive on the protection of whistleblowers, and as per EssilorLuxottica's Reporting Policy, employees of business partners can also report ethical breaches using this reporting platform (such as violation of anti-bribery and corruption, Human Rights, labor laws, Health & Safety, privacy and cybersecurity as well as several other matters as required by applicable laws and described more into details in Section 4.1.5.1 *SpeakUp reporting system*). EssilorLuxottica encourages its Business Partners to set up their own internal reporting channels.

Workers' feedback during responsible sourcing audits helps identify both actual and potential impacts on their well-being, such as unsafe working conditions, wage gaps, or excessive working hours. EssilorLuxottica takes steps to ensure the perspectives of vulnerable or marginalized value chain workers – such as migrant workers, women or trade union workers – are understood and addressed during the responsible sourcing audits. Moreover, the Group uses the takeaways of its engagement activities to verify alignment with its expectations on business conduct and standards as set out in the Business Partners' Code of Conduct which informs the Group's purchasing practices;

- **collaboration with suppliers and local communities:** EssilorLuxottica collaborates with suppliers to conduct training programs and capacity building for workers, focusing on labor rights and workplace safety, along with dedicated training on the Group's Business Partners' Code of Conduct. Support is provided on implementation of corrective actions;
- **monitoring and audits**: EssilorLuxottica conducts regular yearly third-party audits at its own manufacturing and supplier sites to assess compliance with its labor standards and gather insights on worker's well-being. Audit findings inform tailored action plans to address gaps and drive improvements.

The sustainability engagement with suppliers occurs at different stages of the value chain, from selection and onboarding to ongoing monitoring through third party audits and self-assessments, and to post-audit follow-up to validate audits findings and implementation plans.

At EssilorLuxottica, the responsibility for ensuring meaningful engagement with value chain workers through sustainability assessments and on-site audits and integrating the results into the decision-making processes is embedded within the corporate governance structure. This ensures alignment with the sustainability goals and accountability at the highest levels of the organization. Operational responsibility for worker engagement resides primarily within the following functions:

- **Sourcing and Procurement function**: Ensures supplier sustainability engagement activities are integrated into supplier selection, onboarding, monitoring, and contract management processes. Works closely with the Corporate Sustainability team to address findings from worker engagement and audits.
- **Corporate Sustainability function**: Ensures alignment with the broader sustainability strategy and international labor standards.

The most senior role responsible for ensuring engagement with value chain workers is the Chief Operating Officer (COO) who collaborates with the Chief Corporate Sustainability Officer, ensuring alignment between operational practices and sustainability objectives. Both the COO and the Chief Corporate Sustainability Officer report directly to the Chairman and CEO. The Responsible Sourcing & Manufacturing Steering Committee reviews the outcomes of engagement activities with a focus on manufacturing and responsible sourcing audits on a regular basis and ensures they follow up on any potential operations and supply chain risks. The Chairman and CEO and the Board of Directors receive updates on sustainability outcomes and provide guidance on strategic priorities related to EssilorLuxottica's Eyes on the Planet sustainability strategy.

EssilorLuxottica assesses the effectiveness of its engagement with value chain workers through a combination of key metrics, including number and type of findings during suppliers' audits, resolution times for grievances and corrective action plans, participation rate in supplier trainings and improvements in supplier compliance with the Group's Business Partners' Code of Conduct. Effectiveness is further evaluated via third-party audits, sustainability assessments on the EcoVadis platform, and benchmarking against industry best practices. Findings are reviewed by the Responsible Sourcing & Manufacturing Steering Committee and integrated into policy updates, supplier action plans, and new initiatives.

3.2.4 Actions and Resources

EssilorLuxottica's approach is to privilege audits and remediation in order to prevent material negative impacts on value chain workers. In 2024, as part of the ELRSM program mentioned in previous paragraphs, 106 responsible sourcing audits at supplier sites were conducted, which is a slight increase (+4%) compared to the 102 audits conducted in 2023.

Among the 106 conducted audits in 2024, 63 current and potential Direct Material suppliers were subject to audits in 10 countries. The split of audits was the following:

- five follow-up audits due to unsatisfactory results of an audit from the previous year; and
- 58 maintenance audits, to continue to be qualified as Company suppliers.

Major instances of critical non-conformities were identified for seven suppliers mainly in the areas of working hours, Health & Safety and environmental management practices. Action plans were defined for all of them and executed in 2024.

The audit process with a dedicated focus on AFA suppliers continued in 2024, with 43 audits on production plants of suppliers, representing 64% of AFA Global Collection spending, in line with previous years, located in 14 countries. Three instances of non-compliance of critical non-conformities were identified in the areas of working hours and consecutive working days. Action plans were defined for all of them and executed in 2024.

As part of EcoVadis program, supplier sustainability assessment for the top Tier 1 suppliers and subcontractors have been carried out in 2024.

In addition, to support and strengthen its responsible sourcing program and ensure alignment with Company standards, EssilorLuxottica has in place training, capacity building, and awareness initiatives targeting suppliers and the procurement community. In 2024, a new training initiative focusing on the updated Business Partners' Code of Conduct and ELRSM audit checklist was launched focused on suppliers in Bangladesh, China and Indonesia, involving 26 factories with 46 participants in total. Moving forward, EssilorLuxottica will continue building its global program to further align and strengthen the organization and management of responsible sourcing.

In addition, with the acquisition of the Supreme brand, their responsible sourcing and supplier audit program was assessed in 2024. EssilorLuxottica conducted an audit checklist comparison and pilot audits at Supreme suppliers to prepare the integration of Supreme's respective program.

Besides, as mentioned in Section 3.1.6.6 *Actions and resources*, a Human Rights task force gathering several functions (such as Corporate Sustainability, Compliance, Procurement, Risk Management, HR, EHS, Internal Audit, Operations) to coordinate actions related to Human Rights, in anticipation of the CS3D has been created in 2024.

In 2025 and 2026, EssilorLuxottica will focus on the anticipation of CS3D. The following action plans are planned:

- enhancement of the Human Rights risk mapping in 2025, including the value chain;
- enhancement of third-party training on Human Rights and anti-corruption, including specific information about grievance and whistleblowing procedures;
- enhancement of the third-party due diligence and audit procedures (upstream and downstream supply chain);
- creation and implementation of a general process for the engagement of value chain workers as part of stakeholders' initiatives (including mapping of existing initiatives, identifying areas of involvement of value chain workers as part of stakeholders' initiatives, tracking of initiatives and results);
- selection and implementation of a third-party risk management and due diligence tool;
- enhanced formalization of prevention and remediation procedures;
- enhancement of contractual clauses to improve compliance with the Business Partners' Code of Conduct;
- periodical update of the Business Partners' Code of Conduct.

3.2.5 Targets

Specific targets covering such ESG topic will be set in due course. However, as part of the Responsible Sourcing program, EssilorLuxottica tracks the following metrics for its tier 1 suppliers:

- Number of tier 1 suppliers being assessed on the EcoVadis platform;
- Number of on-site responsible sourcing audits conducted;
- Number of critical non-conformities identified and followed up.

3.3 ESRS S3 – Affected Communities

3.3.1 Introduction

EssilorLuxottica's Mission is to help people around the world 'see more and be more'. The Mission is fully-fledged into the Group's strategy and is at the heart of its principles and values. It is embedded in the Group's integrated approach to sustainable development and its ambition to eliminate poor vision in a generation.

Despite the ongoing challenges and uncertainties faced by the world, EssilorLuxottica remains resolute in its commitment to providing access to vision care in the most vulnerable communities, as a leading contributor to the well-being of society.

The launch of the OneSight EssilorLuxottica Foundation in 2022 – the largest foundation in the world driving inclusive vision care access – marked a new chapter in EssilorLuxottica's journey to accelerate its Mission and bring vision care to those in need. The Foundation works with governments and non-governmental organizations, like-minded partners and thought-leaders in the industry to establish and support strategies that ensure the provision of vision care and eyeglasses to those in need.

As a testament to the Foundation's reach and impact, the World Health Organization (WHO) onboarded the Foundation as a global collaborating partner on the WHO SPECS 2030 initiative. This represents a significant step forward in addressing refractive error, preventing myopia, and improving access to vision care worldwide, particularly in low-resource settings.

The Foundation's efforts to bring vision care to communities in need have been celebrated around the world. Notable examples include recognition on Fortune's Change the World list for the 4th time, securing the 'Champion of Good' award in Singapore for the 4th consecutive year, and receiving the prestigious Melvin Jones Fellowship Award from Lions Club in New Mexico for its impactful Changing Life Through Lenses Program.

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

3.3.2 Material Impacts, Risks and Opportunities

Material ESG Topic	IRO name	IRO description	Policy	Target/Metric
Affected Communities right and engagement	Impact on local communities' development thanks to eyewear and eyecare programs	Eyecare and eyewear programs enhance the overall quality of life, particularly in underserved and vulnerable populations. Good vision directly contributes to better educational outcomes for students and increased productivity for workers, fostering economic growth at the local level. Additionally, these initiatives often create job opportunities within the communities, both in the delivery of eyecare services and the distribution of eyewear products.	• EssilorLuxottica OneSignt Foundation strategy	• Eliminate uncorrected poor vision by 2050
Impactful programs that give vision care access to all	Volunteering activities and social initiatives	Engagement activities and employee volunteering activities through the OneSight EssilorLuxottica Foundation contribute to the improvement of economic and social conditions of underserved communities at a local level, as well as enhance employees' sense of contribution and engagement through their involvement in volunteering activities.		
Creating awareness for vision care for all	Creating access to eyewear and eyecare solutions for disadvantaged communities	Creating access to eyewear and eyecare solutions for disadvantaged communities by tackling uncorrected poor vision in underserved populations, offers a dual advantage: improving quality of life (enhanced education, socio-economic development, and public health) and offering market opportunities (new segments, new products, etc.).		

3.3.3 Governance and Stakes

The Head of Mission and President of the OneSight EssilorLuxottica Foundation reports directly to the Chief Executive Officer and Chairman of EssilorLuxottica, and is responsible for overseeing the Group's initiatives to reach the 2.7 billion people living with uncorrected poor vision. The CSR Committee within the EssilorLuxottica Board of Directors monitors the progress made on all Mission actions and ensures alignment with the Group's strategy and stated ambition of eliminating uncorrected poor vision in a generation.

The OneSight EssilorLuxottica Foundation works globally toward creating vision care access across underserved populations. To facilitate this, the Foundation operates nine regional affiliate non-profit organizations that are duly registered in their regions of operations: Europe, Italy, North America, Latin America, Africa, India, South-East Asia, China and Oceania. Each of the regional affiliates reports its progress to its duly constituted Board of Directors. The Head of Mission serves on the board of all the affiliates and ensures alignment with the global Mission strategy, objectives and adherence to annual plans. Relevant functional and regional leaders from the Group serve as board members of all the regional affiliates to ensure close alignment with Group policies and collaboration with relevant stakeholders of EssilorLuxottica.

Today:

- 2 billion people are wearing glasses, and will continue to need eyewear that suits their changing lifestyles and evolving vision needs;
- 2.7 billion people, or one-in-three globally, suffer from uncorrected poor vision due to lack of awareness and access, 90% of whom live in developing economies at the base of the pyramid[(1)];
- 6.2 billion people do not protect their eyes from harmful rays (sun, UV, blue light).

(1) *Base of the pyramid refers to populations with annual per capita income – based on purchasing power parity in US dollars – of less than US$1,500, the minimum considered necessary to sustain a decent life. Source: Coimbatore Prahalad and Stuart Hart, 'The Fortune at the Bottom of the Pyramid', Strategy+Business 26 (2002): 54-67, http://dx.doi.org/10.19177/reen.v1e220081-23.*

EssilorLuxottica believes that good vision changes everything:

- Good vision is a catalyst for achieving the UN SDGs: It directly impacts goals related to quality education (SDG 4), decent work and economic growth (SDG 8), good health and well-being (SDG 3) and reduced inequalities (SDG 10). By improving vision, EssilorLuxottica aims to empower individuals to learn, work and contribute meaningfully to their communities.
- Good vision improves educational outcomes: children with uncorrected vision impairments often struggle in school because 80% of learning takes place through vision.
- Good vision promotes gender equality: In many communities, women and girls face disproportionate barriers to accessing vision care. By addressing these inequalities and putting glasses on them, EssilorLuxottica intends to empower women and girls to reach their full potential.
- Good vision can transform families: By empowering individuals through professional training and entrepreneurship opportunities in the vision care sector, EssilorLuxottica witnesses first-hand how good vision strengthens economic independence for individuals, families and communities.
- Good vision promotes healthy ageing: Regular eye exams can help detect signs of other health issues, such as diabetes and hypertension, leading to better prevention and improved quality of life as we age.

The Group's dedicated efforts to eliminate uncorrected poor vision for 2.7 billion people are managed by the OneSight EssilorLuxottica Foundation (the Foundation).

3.3.4 Strategy

EssilorLuxottica believes good vision is a basic human right. The Group collectively aims to contribute substantially to its goal of eliminating uncorrected poor vision in a generation. To achieve this milestone, the Group launched a first-of-its-kind roadmap on the sidelines of the United Nations General Assembly in 2019, supported by more than 20 government leaders, NGOs and private organizations dedicated to improving vision care.

The four key pillars of this strategy are:

1. **Creating permanent access**

   The Foundation trains people to be primary vision care entrepreneurs, supporting them to set up their own optical shops and provide mobile services in their communities. To ensure the longevity of these services, the Foundation provides ongoing business development support for these entrepreneurs. It also works with local governments and communities to build permanent vision centers alongside hospitals, clinics and other primary health facilities.

2. **Innovating for affordable solutions**

   Through the development of low-cost, digital and automated screening tools that require less operator training, the Foundation is scaling up the digitization of existing and new efforts and opening up access to affordable quality glasses. This is done in close collaboration with the Group's R&D as well as Operations teams.

3. **Funding subsidized and free services**

   The Foundation works with governments and NGOs to provide free and subsidized services to the communities most in need through direct and indirect programming by focusing free eye exams, free glasses and funding for vision care programs.

4. **Raising awareness**

   The Foundation focuses on creating awareness around good vision and prompting health-seeking behavior among remote communities that have been without vision care access or awareness till now. In addition, the Foundation advocates to ensure vision care has the attention it deserves among global and national policy makers and decision makers as the future of good vision relies on understanding the improved quality of life that healthy vision contributes to.

The OneSight EssilorLuxottica Foundation has three primary objectives relating to creating access to vision care for this population by maximizing:

- number of people with permanent access to vision care in one day's travel;
- number of rural optical points;
- number of wearers equipped by the Foundation's (direct and indirect) programs.

Targets for these objectives are set at a global level and cascaded down to the nine regional chapters annually, based notably on priorities and opportunities discussed with partners such as, but not only, government bodies and/or public healthcare providers. EssilorLuxottica intends to be flexible, allowing agility to reach its objectives and to better serve its ambition. Each region has a local leader reporting directly to the Head of Mission and President of the Foundation. They are supported by global functions including Communications and Awareness, Advocacy and Partnerships and Customer Giving.

Focus at a regional and country level on the Foundation's four strategic priorities varies according to local needs and population data. Similarly, partners are defined at a country and state level to best meet the needs of the Foundation's beneficiaries and accelerate the Foundation's reach.

The Foundation's communication efforts are key to raising awareness, engaging stakeholders and amplifying the global impact of its programs. Updates are shared through the Foundation's website and social media, EssilorLuxottica's corporate channels including the website, intranet, social media, digital windows and Leonardo, as well as press releases, newsletters and articles. Stakeholders can stay informed via these channels and interact with the Foundation through SpeakUp.

The Foundation is supported by EssilorLuxottica employees who participate in clinics and programs, donate to the Foundation and help raise awareness. Retail teams lead efforts to call for customer donations in stores. Opportunities to engage with the Foundation are provided to employees by local HR teams, with many employees choosing to support and volunteer with the Foundation outside of work hours and commitments.

3.3.5 Actions and Resources

To ensure that the Foundation reached its targets and had an impact, specific actions have been put in place for the four key pillars of its strategy described above. Select examples of these actions include:

1. Creating permanent access

To ensure permanent access to vision care in even the most remote communities, the OneSight EssilorLuxottica Foundation works to:

Embed vision care services into existing public healthcare facilities

In Africa, the Foundation works closely with government healthcare providers across the region to establish vision centers within existing hospital facilities. In 2024, 195 access points were set up across the region, which provide access to 24.7 million beneficiaries. This brings our cumulative impact in Africa across 589 access points to 78.2 million people.

To further its reach and impact, the Foundation established a partnership with the Federal Government of Nigeria in 2024, through the National Eye Health Programme (NEHP) of the Federal Ministry of Health and Social Welfare, to launch three vision centers in Lagos, Ondo and Ogun. This is part of the Effective Spectacle Coverage Initiative (ECSIN) Jigi Bola 2.0, aimed at fulfilling the presidential mandate of improving the learning, earning and thriving capabilities of Nigerians through good vision. As part of this initiative, the Foundation successfully launched three vision centers, dispensed 20,000 pairs of glasses and created access for 3.5 million people in need.

Train underemployed and unemployed youth to deliver vision care services within their communities

To accelerate the delivery of vision care services globally, the Foundation trains underemployed and unemployed youths in rural and semi-urban areas to become primary vision care providers, bringing vision care to areas it wasn't available before.

Participants follow certified vocational training in refraction and visual health over 12 months, as well as learn the commercial skills to run a successful small vision care business. This model addresses three key issues: the provision of vision correction to those in need, developing skills and creating livelihoods for youths.

2. Innovating for affordable solutions

Tele-refraction

To address the human resource shortage among optometrists in rural communities, the Foundation developed tele-refraction to allow urban-based optometrists to extend their expertise to rural and remote areas without the need for beneficiaries to travel far for in-person visits. This also reduced the burden of vision care costs on individuals and healthcare systems.

In partnership with Dr Shroff's Charity Eye Hospital, a renowned eyecare institution in India, the Foundation published a groundbreaking clinical study confirming the potential of tele-refraction to enhance access to vision care for underserved populations living in base of pyramid (BoP) communities. The peer-reviewed research, published in PLOS ONE, an open access science journal, demonstrates that tele-refraction conforms to the gold-standard of accuracy of traditional face-to-face eye exams.

Tele-refraction services are now operational in some of India's government health centers, in Kenya with backing from the Government of Kenya and the Christian Blind Mission and in Ethiopia, with support from the Ministry of Health. At the same time, a pilot program is being run in Bangladesh to assess its impact and opportunities to scale.

Combining environmental stewardship and the delivery of vision care through the 'Vula Amehlo' program

The Vula Amehlo program, a first-of-its-kind initiative, was launched in partnership with four South African universities to provide unemployed optometrists the opportunity to establish modular eyecare businesses within refurbished shipping containers. These mobile clinics address healthcare gaps in rural areas, offer career opportunities for optometrists, and support sustainability by recycling containers, which might otherwise be considered unseaworthy or discarded. By repurposing these containers, the program not only addresses the pressing need for accessible eyecare but also promotes environmental stewardship through the creative reuse of resources. In 2024, 10 sites were opened, creating access for 2.8 million people living in rural communities.

3. Funding subsidized and free services

State-wide vision care for children in Goa, India

The Government of Goa launched the 'Vision for All' program to provide all school-going children with a vision test and eyeglasses as needed. The Foundation joined as a partner in 2023 to support the training of 2,400 government schoolteachers, who subsequently provided vision screening to over 230,000 students and distributed free corrective eyeglasses to those in need.

Preliminary results have shown improvements in learning capabilities, attention spans and confidence among students who received eyeglasses through the program.

In addition to improving the overall academic and social well being of local children, the program has also raised awareness about the importance of eye health among teachers, students and their families. In 2024, the State Government of Goa issued a mandate for all school-going children to receive an annual eye test, setting a precedent for other states in India to prioritize eyecare.

Bringing vision care to refugee communities in need with the United Nations High Commissioner for Refugees (UNHCR)

To address vision challenges faced by refugees and offer them a chance to overcome the barriers they face in their new surroundings, the OneSight EssilorLuxottica Foundation has partnered with UNHCR, the UN Refugee Agency, to provide free eyecare services and eyeglasses to refugees in need of vision correction. In 2024, the partnership reached more than 1,100 refugees globally, of which 830 in need received eye glasses.

The Foundation will continue to work with UNHCR to screen vulnerable refugee populations in Australia, Greece, Italy, Kenya, Lebanon, Malawi, Rwanda and South Africa. Those living with uncorrected poor vision will be provided with a pair of eyeglasses and those in need of specialized care will be referred to specialists.

By the end of the partnership, both the Foundation and UNHCR expect to have helped approximately 100,000 refugees globally.

Helping specially-abled athletes to 'see more and be more' at the Special Olympics

For over two decades, the OneSight EssilorLuxottica Foundation and Special Olympics have shared a commitment to advancing access to vision care for specially-abled athletes through the Special Olympics Lions Clubs International Foundation Opening Eyes program. The long-standing commitment was reaffirmed again in 2024 by formally renewing the partnership.

Since 2002, this collaboration has provided over 250,000 pairs of glasses to athletes worldwide.

Ensuring marginalized communities can receive the vision care they need, regardless of circumstance

The Foundation collaborates with partners across the globe to ensure marginalized communities can receive the vision care they need regardless of circumstance. In 2024, this included a partnership with AidOcean, who supported the delivery of vision care services in the most rural areas of Papua New Guinea. In Italy, the Foundation works closely with the Community of Sant'Egidio to improve the livelihood and rehabilitation process for incarcerated individuals. And in China, school-going children and the elderly remain at the forefront of our efforts through the Total Vision Care program, which provides screenings for communities in need.

3. Raising awareness

Through a range of traditional and social media campaigns, and participating in events alongside global meetings such as the United Nations General Assembly, the World Health Assembly and the G20 Summit, the Foundation advocates for vision care as a universal human right. To support these efforts, the Foundation has curated a database of over 1,000 studies and research reports on the impact of good vision which are made publicly available at www.onesight.essilorluxottica.com/research.

In 2024, EssilorLuxottica's 'Learn, Act, Share' initiative has seen more than 100,000 employees take time to learn about the Foundation (Learn), while 35,000 advocate for the vision care cause publicly (Share), strengthening employee retention and satisfaction. Over 5,500 volunteers supported the vision care cause through traditional volunteering opportunities, and 2,170 EssilorLuxottica colleagues participated in the World Sight Day 'The Right To See' photo competition, showcasing on a global scale what good vision means to them (Act).

One of the Group's corporate values (see Section 3.1 *ESRS S1 – The Company's Workforce*), 'We care – close to all, no matter how far', underscores its global vision and commitment to expanding access to vision care.

Customer Giving efforts were accelerated in 2024, and the Foundation successfully expanded efforts in 5,500 additional stores, bringing its total global in-store presence to more than 9,300.

3.3.6 Targets and Metrics

In 2018, EssilorLuxottica announced its ambition to eliminate uncorrected poor vision by 2050. To define what it would take to achieve this ambition, it worked with McKinsey and Co to understand what actions would need to be taken. This research was published in the report 'Eliminating Poor Vision in a Generation: What will it take to eliminate uncorrected poor vision by 2050' and launched alongside the United Nation's General Assembly in 2019.

This publicly available report outlines the collective year-on-year progress that is needed to realize this ambition. While the targets outlined in this report rely on actions by all stakeholders, the OneSight EssilorLuxottica Foundation proportionally aligns its progress to these targets.

Since 2013, the Foundation has:

- provided 979 million people with permanent access to vision care;
- created 33,400 rural optical points;
- equipped 86.8 million people in need with eye glasses.

The impact of its actions has reached 139 countries whether through direct or indirect (partner) programming.

In 2024 alone, the OneSight EssilorLuxottica Foundation:

- provided 216 million people with permanent access to vision care;
- created 5,600 rural optical points;
- equipped 14 million people in need with eye glasses.

3.4 ESRS S4 – Consumers and End-Users

3.4.1 Introduction

At the core of EssilorLuxottica lies a fundamental commitment to its consumers. This section explores the pivotal role of the consumer in everything the Company does, from the initial design concept to the final product delivery. Its approach is centered on three core pillars: data privacy, transparent communication and unwavering quality. In an increasingly digital world, safeguarding consumer data has never been more critical. The Group also ensures that every interaction is handled with the utmost care and transparency. And above all, EssilorLuxottica strives for exceptional quality in both its products and in the consumer's experience.

This section outlines how these principles guide the Group's actions and reinforce its dedication to putting the consumer at the heart of everything it does. It provides an overview of policies covering all consumers, actions, metrics and, when available, targets to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities related to consumers.

3.4.2 Quality

3.4.2.1 Introduction

EssilorLuxottica considers the quality of the product an essential value for the success of the Company. Quality Policies, which covers all consumers, reflect the ongoing commitment to excellence and customer satisfaction. The Group believes that quality is fundamental to build long-lasting trust with its customers.

3.4.2.2 Material impacts, risks and opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Product Safety	Potential Health & Safety issues for consumers due to the use of the products	Product defects, inadequate safety standards and harmful materials can affect consumers, leading to injuries and health issues. This exposure can lead to health concerns, including eye strain and skin damage. Furthermore, harmful materials can trigger allergic reactions, compromising comfort and well-being	• Quality Policies • Consumer complaints management	• **<1 ppm** in global consumer claims related to personal safety and consumer risks • **Zero recalls** in EU countries
	Risk of litigations and reputational damages due to product quality and safety issues	Incidents related to product quality and safety assurance may lead to claims for compensation from consumers and fines from authorities, as well as negatively impact brand reputation, resulting in financial losses		

3.4.2.3 Policies

Document	Key content	Function	Scope	Availability
EssilorLuxottica Group Frame and Plano Quality Policy	It outlines EssilorLuxottica's commitment to ensuring and improving the quality of its products or services. It establishes the guidelines and objectives the Company aims to achieve in order to meet consumer needs and comply with applicable regulations. The Policy takes into account Third Party Reference standards such as Medical Device Regulation (EU) 2017/745 and the Quality Management System standards EN ISO9001:2015 and EN ISO13485:2016, as well as existing best practices in the industry.	Quality	Own operations	Public
EssilorLuxottica policies for Ophthalmic Lenses	The policies articulate EssilorLuxottica's commitment to: • increase consumer satisfaction by delivering an experience which meets or exceeds the expectations of consumers and by collecting and using their opinions to drive improvements everywhere; • ensure all necessary regulations and standards are met through a systemic approach, covering the full product life cycle; • strive to deliver the Group promise by defining the value proposition for each consumer segment and guarantee that they will be fulfilled in a verifiable way everywhere and every time. In order to define success in these commitments, EssilorLuxottica structured a quality management system (QMS) relying on requirements of ISO 13485.	Quality	Own operations	Internal
Consumer complaints management	Dedicated internal management procedure defining responsibilities and operating practices for collecting and handling consumer complaints from distribution channels. The procedure applies to complaints about technical problems, product safety or health issues.	Customer facing teams and Central Quality	Own operations	Internal

Human Rights are covered through the compliance policies. EssilorLuxottica commits to comply to the applicable laws and regulations which include internationally recognised instruments (Human Rights) as stated by OHCHR (Office of the United Nations High Commissioner for Human Rights). Moreover, EssilorLuxottica implemented a CAPA policy (Corrective and prevention actions) to address any identified Human Rights issues related to product defects or service failures that affect consumers.

3.4.2.4 Processes for engaging with consumers

EssilorLuxottica uses various channels to monitor feedback from consumers, ensuring continuous assessment of potential and actual product impacts. Through its After Sales function, the Company gathers insights from market surveillance, product claims and returns. This data enables the company to evaluate whether adjustments to its quality policies are needed and to determine whether corrective actions, new testing protocols or updated product risk analyses are required to mitigate potential risks to consumers.

This process is integrated into the Company's overall approach to product quality and safety. The responsibility for ensuring this continuous engagement lies within various operational roles. The After Sales department manages consumer engagement channels and feedback collection, while the Group Quality function analyzes and assesses feedback related to product safety (quality compliance) and product quality (quality excellence). By working together, these departments ensure that insights from consumers shape decisions on quality and safety measures.

3.4.2.5 Processes to remediate negative impacts and channels for consumers to raise concerns

EssilorLuxottica's Quality Management System has a dedicated procedure to ensure effective handling of consumer complaints and adverse events from all Group distribution channels. This procedure establishes clear responsibilities and processes for collecting, documenting, evaluating and reporting product quality complaints and safety issues in compliance with regulatory requirements.

Consumer Complaint Collection and Reporting

Consumer complaints and adverse events are gathered from various distribution channels, including subsidiaries and distributors in both EU and non-EU markets. Consumers can raise their concerns by reaching out to the store where they made their purchase or by contacting the relevant brand's Consumer Service directly using the contact channels posted on the dedicated website. In countries where EssilorLuxottica sells products through proprietary e-commerce sites, consumers have access to an e-commerce channel consumer service or they can also contact the service via email, phone, and, where available, chat. Additionally, the corporate website features a dedicated consumer service page with detailed guidelines (https://www.essilorluxottica.com/en/brands/consumer-care/) providing a unified communication channel regardless of the consumer's purchasing platform.

To ensure timely response, any channel receiving a consumer complaint must immediately forward it to the relevant department according to the dedicated communication flow. This triggers a reporting procedure to the Group quality team, which evaluates complaints and determines corrective actions in case of defective eyewear models. Reports are stored in the company's PLM (Product Lifecycle Management) Enovia/Matrix IT system and analyzed for severity. Corrective actions effectiveness is assessed using the KPI about warranties, complaints, safety complaints, recalls and fines.

Data Monitoring and Escalation Processes

The Group Quality function periodically extracts and reports complaint data to management for review and potential corrective actions. Additional measures would be activated in case of incidents that could significantly impact consumers (e.g., life-threatening situations or severe health risks). For instance, the 'Surveillance and Vigilance' procedure ensures the event is reported to regulatory authorities promptly and legal procedures are followed.

Product safety issues are tracked using a dedicated questionnaire and stored in a specific repository. These issues, along with technical complaints, are registered in the PLM system and monitored by central quality. Continuous monitoring of reports evaluates the effectiveness of reporting channels and identifies areas for improvement.

Root Cause Analysis and Corrective Actions

In case of an incident, a root cause analysis is conducted to assess factors such as manufacturing processes, design, labelling and user instructions. Depending on the outcome of internal audits, solutions may include the replacement or repair of individual products, corrective actions to address products already on the market and changes to future production. These steps are designed to mitigate risks and prevent recurrence.

Additionally, data from complaints feed into the company's post-market surveillance system. This system continuously monitors and assesses product quality, performance and safety, ensuring appropriate actions are taken to maintain high standards and update risk analyses of affected products.

Consumer Feedback and Continuous Improvement

To further improve processes, consumers contacting e-commerce consumer services are sent a dedicated satisfaction questionnaire. Available in key countries and banners operated by EssilorLuxottica, the questionnaire allows consumers to rate their experience and provide written feedback. These responses are consistently analyzed to identify areas of improvement in consumer service management.

The ability of consumers to report issues using multiple contact channels enhances the communication's overall efficiency. EssilorLuxottica also maintains ongoing communication with regulatory authorities, healthcare providers and users regarding investigations and actions taken.

Risk Management and Current Performance

Cases involving risks of retaliation or other concerns are assessed individually with the support of competent company structures. To date, no significant consumer complaints have been received that justify corrective action. For safety complaints, EssilorLuxottica has achieved a retrieval rate of less than 1ppm (part per million) on the total number of shipped pieces, demonstrating the effectiveness of the company's processes in maintaining product quality and safety.

3.4.2.6 Actions and resources

EssilorLuxottica's Commitment to Product Safety and Innovation

For EssilorLuxottica, product safety is an absolute priority and the foundation of any sustainable offering. Its products are the result of continuous investment in research, design and innovation, and are developed according to high-quality standards with stringent controls on mechanical, chemical and optical characteristics that are equal or superior to industry standards and regulatory requirements in terms of safety, performance and durability. Indeed, the Group's sustainable innovation expertise embraces products and services without compromising excellence or quality and always guarantees the best vision experience. New control plans and test protocols have been developed to guarantee increasingly greater product safety (i.e., optical powers, lens transmittance and filter category, the correct fixing of ophthalmic lenses even on frames received by the consumer, new sustainable collection). To reduce the waste of materials, samples of products that would have otherwise been destined for destruction are used for testing New Product Introductions.

EssilorLuxottica's rigorous testing procedures

To guarantee maximum product safety and efficiency to its patients and consumers, EssilorLuxottica performs, with ever-increasing effort, all tests required to ensure compliance with international regulations concerning chemical substances and medical and consumer products, using both in-house laboratories and third-party certified facilities. Particular attention is given to compliance with restrictions for PFAS products and possible developments of related regulations at the international level in the coming years.

As mentioned above, EssilorLuxottica conducts rigorous testing at multiple stages. Before any new eyewear model enters production, tests and risk evaluations are conducted in the company's ISO 17025-accredited internal laboratories. A specific protocol has been developed to assess the product against EssilorLuxottica's established quality standards, aimed at identifying and mitigating potential risks for consumers. The results of these tests are documented for each model and archived in the PLM system for traceability. If any non-conformities or critical issues are identified during these tests, they are addressed through the quality management system before the product can proceed to production.

During the production process, ongoing tests are carried out to ensure that the eyewear continues to meet established quality standards. These tests include assessments of UV absorption, lens transmittance uniformity, optical powers, polarization axis and mechanical and aesthetic properties. The tests are done on a sample basis for each batch, and the production process is strictly governed by detailed operating instructions that are part of the Quality Manual. If any product fails to meet quality standards, it is flagged as non-conforming and managed in accordance with the 'Product Nonconformity Management' procedure, which ensures the product is separated from compliant items, reworked or repaired before reaching the market.

EssilorLuxottica also submits representative product samples to accredited external laboratories for compliance testing. These external labs conduct safety tests in line with European and international standards, evaluating a variety of eyewear models to ensure broad coverage of different materials, designs, and categories.

More specifically for Ophthalmic lenses, EssilorLuxottica set a comprehensive level of actions to mitigate consumer related risks. For instance, EssilorLuxottica has identified the potential impact to consumer of skin sensitization or irritation arising from the use of materials that may not be suitable for skin contact. To mitigate this, the company adheres to stringent testing protocols as per ISO 10993 standards, ensuring all materials used in its products meet the necessary safety requirements. Another example is regarding the risk of Lens breakage which could compromise consumer safety by exposing eyes to harmful cuts. This risk is rooted in potential inaccuracies in lens manufacturing or design. EssilorLuxottica mitigates this by implementing tests required through ISO 14889.

Overall, EssilorLuxottica's robust testing procedures at internal and external laboratories, coupled with continuous monitoring of product quality during production and post-market, ensure the company's commitment to preventing negative impacts on consumers while maintaining the highest safety and quality standards.

Non-Animal Testing Initiatives

Considering general growing sensibility around animal welfare practices (expressed also in the EssilorLuxottica Quality Policy) and, at the same time, the need to test products to ensure skin biocompatibility as required by international medical device regulations, a roadmap has been created to merge these two needs. While waiting for a completely in vitro test protocol to be included in the ISO regulations to evaluate skin biocompatibility of materials and as alternative non-animal methods are progressively validated (e.g., the work of EURL ECVAM – EU Reference Laboratory for alternatives to animal testing) though not yet internationally approved, EssilorLuxottica is already working with certified and approved labs to conduct in vitro tests and avoid any animal tests, in line with the Group's decision to completely eliminate animal testing to evaluate skin biocompatibility of material. Therefore, in 2024 no tests to evaluate skin biocompatibility were carried out on animals.

This approach is also in line with the Group's animal welfare policy and in full compliance with the international regulations concerning chemical substances, medical and consumer products. However, compliance with international medical device regulations may require animal testing. The evaluation of such requests requires full compliance of third-party certified facilities with local and international regulations on animal testing and the scientific proof that there is no other viable alternative.

Innovations at the Agordo Central Quality Laboratory

The Agordo Central Quality laboratory has been completely rebuilt and continues to increase testing capabilities and capacities; a part of the lab is dedicated to mass production monitoring in terms of REACH regulation compliance testing on finished products, while new sections host new parts of the business. Among these, new products from Essilor Instruments are now presented in an Ophthalmic laboratory where Telemedicine certification is also in scope. The laboratory has been upgraded to perform Rx lens testing, and new wearable products can now be tested in terms of water resistance thanks to IPX custom equipment. The Oakley AFA division has new equipment that measures trekking shoes, zipper, bike clothing and snow jacket performances to help determine improvement opportunities.

Regarding the eyewear industry, a new automatic environment simulation was developed to accelerate high humidity and temperature conditions usually found in APAC regions in order to test sun lens coatings.

In 2024, for the eyewear industry, Agordo Central Quality Laboratory has introduced a humanoid robotic workstation to simulate real-life use of complete eyewear sets (frame, lenses and packaging) in everyday scenarios. This includes actions such as unpacking the product, cleaning the lenses, wearing them and subjecting them to conditions like sweat and varying temperatures. The robot operates continuously, 24/7, replicating seasonal changes to ensure thorough testing. Additionally, a vibrating machine equipped with a climate chamber has been developed to faithfully simulate transportation conditions, whether by air, road or train. This advanced system performs temperature and humidity ramps to replicate the entire product shipping journey.

Advancing Smart eyewear and Hearing Aid Technologies

EssilorLuxottica continues to develop and reinforce its internal competence for smart eyewear regulatory framework and compliance aspects, applying shared and common guidelines for the qualification of new products in every region. Given the riskier nature of this new type of eyewear, which integrates frame batteries and electronic components, EssilorLuxottica is enforcing mandatory control plans with more restrictive policies to control product safety, sampling in mass production units for testing, even if already certified.

This year, EssilorLuxottica developed the competence for regulatory framework and connected risk assessment for hearing aid wearable devices, with the prospect of developing wearable products that also integrate systems to help people with mild to moderate hearing loss.

Adapting to a Changing Regulatory Landscape

In the context of a constantly evolving regulatory world, EssilorLuxottica employs a regulatory watch process that helps anticipate the evolution of International and European regulations on product safety and performance, keeping consumer protection at the forefront of its operations.

Quality systems are in place to meet regulations across the product life cycle and create ever-greater standardization at group level. For instance, in 2024, EssilorLuxottica consolidated ISO 13485 certifications to most lens factories and its most important prescription laboratories. To further improve consumer satisfaction, the Company developed programs for structured feedback collection. These insights inform ongoing enhancements to products and services, solidifying the company's reputation for excellence.

Protecting Intellectual Property and Combating Counterfeiting

With 24,550 trademarks and over 15,000 patents and designs owned, intellectual property is one of EssilorLuxottica's most important assets that ensures the excellence, uniqueness and superiority of its products. It is based on the registration and maintenance of the Company's trademarks and patents across the world.

As described in Chapter 1 of the 2024 Registration Document, the protection of intellectual property rights also involves combating counterfeiting. The worldwide proliferation of counterfeiting not only threatens official sales channels and company reputation, but it also poses risks to the Health & Safety of consumers. Counterfeit products do not ensure the same elevated quality standards as the originals, which are certified for excellence by the most stringent quality tests and use of highly innovative materials. The Company's authentic products are impossible to process or replicate without the necessary know-how as well as the ongoing innovation used in the production processes. To ensure consumers are not exposed to counterfeit products, the Company collaborates with local institutions and authorities around the world to intercept counterfeit products and combat the entire illegal production chain as best permitted by law. For greater effectiveness in the battle against counterfeiting and the expansion of parallel markets that divert goods into unauthorized sales channels, EssilorLuxottica has developed GLOW (Guaranteed Luxottica Origin Worldwide). GLOW is a traceability system based on RFID technology that can verify the authenticity of products as well as the suitability of resellers. It is passive and emits no radio waves, making it safe health-wise. It also does not record personal data and only delivers product information.

3.4.2.7 Targets

EssilorLuxottica's commitment to delivering the highest quality in their products is reflected in its continuous pursuit of excellence across several key areas. The company strives for aesthetic perfection, ensuring that every product embodies beauty and meticulous attention to detail. Comfort is another priority, with the goal of providing users with a perfect fit that enhances their overall experience. In terms of performance, EssilorLuxottica is dedicated to using the best materials and lenses that meet technical standards. Functionality is equally important, ensuring that all products operate smoothly and efficiently. Reliability is also at the heart of their objectives, with a focus on creating products that last over time. Safety remains a top priority, with a firm commitment to regulatory compliance and consumer protection. Finally, the company embraces technological evolution, continuously improving based on market feedback to stay at the forefront of innovation.

To measure their success in these areas, EssilorLuxottica has set clear targets. They aim to receive fewer than 1 ppm in global consumer claims related to personal safety and consumer risks every year. Additionally, EssilorLuxottica strives for zero recalls in EU countries for safety-related reasons every year and aims to avoid any fines or sanctions connected to product safety and consumer protection in the same region. These targets reflect the company's dedication to providing products that meet the highest standards of safety, performance and consumer satisfaction.

3.4.3 Data Privacy

3.4.3.1 Introduction

In an increasingly global and digital environment, protecting the privacy and personal data of all its relevant stakeholders is a key priority for EssilorLuxottica. The Group strives to protect their privacy all over the world by complying with all applicable laws and regulations concerning the protection of personal data.

EssilorLuxottica also expects its suppliers and subcontractors processing personal data on its behalf and on its instructions to comply with all applicable data protection regulations and to include appropriate personal data protection clauses or agreements, as well as to demonstrate to have in place or maintain adequate technical and organizational measures to protect the confidentiality and security of personal data they process, including when using subcontractors.

To the extent above, EssilorLuxottica's privacy compliance program protects the personal data processed by the different entities of the Group or their suppliers and subcontractors according to applicable data protection laws and regulations. Such a program includes the definition and regular review of applicable privacy documentation (e.g., privacy statements, privacy and cookie notices, Group data protection policies, cookie banners, data protection impact assessments, etc.) to increase stakeholders' understanding of their duties and provide data subjects with clear information (especially through the privacy statement and the customer-facing privacy notices).

3.4.3.2 Material impacts, risks and opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Data Privacy	Consumer's personal data breaches	Data breaches resulting from inefficient data privacy measures expose consumer and stakeholder personal data to unauthorized third-parties, causing the affected persons anxiety, stress and distrust for the company due to the loss of control on their personal data.	• Business Partner's Code of Conduct • Data Protection Policy • Data Privacy Statement • Customer-facing Privacy Notice and Cookie Notice/ Cookie Banner • Data Retention Policy • Data Breach Policy	• Monitoring of DSRs received at corporate level
	Infringements of data privacy-related regulations	Infringements of data privacy-related regulations pose reputation and legal risks for organizations and individuals. Non-compliance with laws such as the General Data Protection Regulation (GDPR) or similar data privacy frameworks can result in severe financial penalties, legal liabilities and potential litigations. Beyond financial repercussions, violations of data privacy can erode trust with consumers, damaging a company's reputation and leading to a loss of consumer loyalty.		

3.4.3.3 Policies

Document	Key content	Function	Scope	Availability
Business Partner Code of Conduct	It sets out the EssilorLuxottica guiding principles for managing its supply chain responsibly by encouraging its Business Partners to implement the same industry-leading ethical, human, social and environmental standards (including data protection) that EssilorLuxottica applies in its own business activities.	Compliance/ Sourcing & Procurement	Upstream and downstream	Public
Data Protection Policy	It sets out the Group's guiding principles for processing personal data and coordinating the flows of personal data inside the Group, in line with the requirements set by applicable data protection laws and regulations (e.g., GDPR). This Policy also sets forth how the protection of personal data is organized inside EssilorLuxottica and the function that is responsible for the different processing steps, in order to ensure compliance with data protection laws and regulation.	Compliance	Value chain	Internal
Data Privacy Statement	This Statement describes how personal data is collected and processed within EssilorLuxottica, the latter acting as data controller or data processor in the performance of its business activities. It is in compliance with applicable regulations.	Compliance	Downstream	Public
Data Retention Policy	It sets up the Group's requirements and the rules to retain data and to dispose of such data, and provides guidance on appropriate data handling and disposal. This Policy applies to both non-personal data and personal data, physical and digital. It applies throughout the entire life cycle of the information, from its creation through its storage and utilization to its disposal.	Compliance	Value chain	Internal
Customer facing Privacy Notice and Cookie Notice/ Cookie Banner	These notices aim at informing consumers and/or end-users on how their data is collected and processed by EssilorLuxottica, by providing them with all the related and relevant information and details as defined by applicable laws (Article 13-14 GDPR).	Compliance	Downstream	Public
Data Breach Policy	This Policy covers the following points: • definition of data breach (both suspected and confirmed); • the steps to report a data breach (suspected or confirmed) internally (how and who to report the data breach to within the organization); • responsibilities of the data breach management team in ensuring that the organization's response will not be unnecessarily delayed; • instructions on how to respond to a data breach following the 'C.A.R.E.' model: (i) containing the data breach; (ii) assessing the risk(s) resulting from the data breach; (iii) reporting the data breach; and (iv) evaluating the response and recovering to prevent future data breaches.	Compliance	Value chain	Internal

Approach on Human Rights and engagement with consumers

All EssilorLuxottica data protection policies are inspired both by the European E-Privacy Directive and the GDPR. In particular, the GDPR in its Recitals defines the protection of natural persons in relation to the processing of personal data as a fundamental right of individuals whatever their nationality or residence. Such a legislation is also inspired by the privacy principles embedded into the (i) Charter of Fundamental Rights of EU – Article 8 'Protection of Personal Data'; (ii) European Convention on Human Rights – Article 8 'Right to respect for private and family life' and (iii) Treaty on the Functioning of the European Union (TFEU) – Article 13, as well as the (iv) UN Universal Declaration on Human Rights – Article 12.

Engagement with consumers

The Code of Ethics, EssilorLuxottica Privacy Statement, Customer-Facing Privacy Notices, and Cookie Notices/Cookie Banners are available on the EssilorLuxottica's websites and/or in its stores. In case of major updates in the Customer-Facing Privacy Notices, the customers will receive a communication informing them about the changes.

Measures to remedy Human Rights impact

EssilorLuxottica puts at the disposal of consumers several instruments to express their remarks: (i) the SpeakUp channel, described in the EssilorLuxottica Code of Ethics; (ii) the Data Protection Officers' (DPO) e-mail addresses (both Group and local) which are, as the case may be, reported in contracts with suppliers and sub-contractors and in the relevant privacy notices, (iii) an automated tool ('web interface') that consumers may access to send the company a request regarding their rights pursuant to applicable privacy laws. Such a web interface is live for some of EssilorLuxottica's brands and affiliates. For the concerned brands and affiliates, the web interface can be accessed through a dedicated link contained in the relevant customer-facing privacy notice, (iv) file their relevant request to Customer Service or directly to the personnel in stores. As per applicable data protection laws, consumers may also file a claim to the concerned EssilorLuxottica entity and/or lodge a complaint with the relevant Data Protection (Supervisory) Authority.

Availability of channels and tracking of effectiveness

Channels like SpeakUp or DPO mailboxes are managed by the compliance and Group Data Protection Office, which coordinate with the relevant business functions to obtain needed information regarding data subject requests.

The other Channels are managed by the relevant processing owners, which may involve the Group Data Protection Office for consultation and advice.

The Group Data Protection Office that receives requests or complaints at DPOs mailboxes can track, when relevant, some KPIs (e.g., number of complaints received by the concerned EssilorLuxottica affiliate, directly from data subjects, number of closed complaints, etc.) with the purpose of assessing the effectiveness of the data protection safeguards in place.

Effectiveness of the channels above can also be indirectly assessed by each relevant EssilorLuxottica affiliate through the number of complaints it receives directly from other data protection (supervisory) authorities engaged by consumers.

EssilorLuxottica and its affiliates have also put in place a data breach register, where each personal data breach affecting the relevant entity is duly recorded.

Policies in line with internationally recognized instruments

The EssilorLuxottica Code of Ethics and Business Partner Code of Conduct define the principles that apply to all EssilorLuxottica employees, contractors, vendors and suppliers, and in accordance with international framework, such as the United Nations Global Compact, set out a minimum set of standards (including data protection) that cannot be compromised.

EssilorLuxottica strives to comply with all data protection laws and regulations applicable in countries where it operates to ensure the protection of personal data of its stakeholders, including regulations like the General Data Protection Regulation (GDPR) in Europe, the California Consumer Privacy Act (CCPA) in the United States, the Lei Geral de Proteção de Dados Pessoais (General Data Privacy Law – LGPD) in Brazil, the Personal Information Protection Law (PIPL) in China, as well as specific regulations such as the Health Insurance Portability and Accountability Act (HIPAA) in the United States (with regard to the privacy aspects). EssilorLuxottica is also taking steps to understand the impact of new regulations on its current privacy processes and procedures, such as the Digital Service Act in Europe, the Digital Marketing Act or the new European IA Act.

Furthermore, its policies, statements, notices and guidelines conform to the following internationally-recognized privacy instruments:

- the Standard Contractual Clauses for the transfer of personal data to third countries implemented by the European Commission ('SCCs');
- the guidelines, recommendations, best practices and opinions issued by the European Data Protection Board ('EDPB').

3.4.3.4 Processes for engaging with consumers

In recent years, data protection laws and regulations have increased significantly and still continue to do so, giving individuals more and more control over their personal data. In a digital economy – and given the Group's digital footprint – EssilorLuxottica considers the protection of the personal data of its consumers (including patients and children) an essential priority.

As a result, appropriate measures and safeguards are implemented to protect the personal data that EssilorLuxottica processes. In the event a data breach occurs or is suspected to occur, the Group's policies ensure notification of its consumers and any applicable regulators where it is legally required to do so.

Engagement of consumers may occur directly and in the following situations: (i) when they visit and/or purchase products or services at Group stores; (ii) when they browse and/or purchase on its e-commerce platforms; (iii) when they use one of its digital tools/applications; (iv) when they contact the customer service. For children specifically, the engagement happens through their parents or legal guardian, who will authorize the use of their personal data by giving consent in all cases where it is legally required for processing.

In accordance with the Group's policies and with the data protection laws and regulations in force, the relevant processing owners (as defined in the Group Data Protection Policy – depending on the case, retail, e-commerce, digital) have the accountability and the responsibility to implement the needed and proper privacy notices and to collect and process the personal data of consumers and end-users in compliance with applicable privacy laws and regulations, as well as with EssilorLuxottica data protection policies, statements, notices and guidelines.

The Group Data Protection Office in its role provides the business with advice and guidelines, supports the completion of risk assessments and provides documentation and notice templates. With the support of the Internal Audit function, the Group Data Protection Office measures and verifies that data protection is properly considered and addressed within EssilorLuxottica and participates in the development, monitoring and fulfilment of remediation action plans which may arise from such audits.

Additionally, affiliates may assess their consumer engagement effectiveness by monitoring data subject rights requests received during the relevant period, as well as complaints lodged with the relevant Data Protection (Supervisory) Authority when consumers are dissatisfied with EssilorLuxottica's response or remedial actions.

3.4.3.5 Processes to remediate negative impacts and channels for consumers to raise concerns

Measures in place to address concerns by consumers

When a data breach occurs, EssilorLuxottica immediately begins the necessary steps to mitigate the impact of the personal data breach on the affected individuals. Each Personal Data Breach is dealt with on a case-by-case basis, first assessing the risks involved and using that risk assessment as basis for determining the actions to be taken in each specific case. When relevant, EssilorLuxottica may set up call centers to answer questions raised by affected individuals, as well as notifying the affected data subjects and/or the relevant Data Protection authorities (where required by applicable laws and regulations.)

Raising concerns, tool knowledge, trust and protection

Analyzing both consumer complaints received directly and those filed with data protection authorities helps EssilorLuxottica assess consumer awareness of and trust in its privacy management processes.

EssilorLuxottica's SpeakUp platform, which allows consumers to report privacy concerns, guarantees impartiality, confidentiality, efficiency and protection from retaliation. The company enforces a strict non-retaliation policy protecting good faith reporters from any detrimental treatment resulting from their reports. Group employees and stakeholders are prohibited from threatening or retaliating against reporters. Violations of this policy may result in disciplinary action, and both the responsible EssilorLuxottica entity and the individual engaging in retaliation may face civil or criminal penalties under applicable laws.

3.4.3.6 Actions and resources

Introduction

EssilorLuxottica is committed to protecting stakeholder data privacy while ensuring compliance with data protection laws and regulations worldwide. The Group has implemented a privacy compliance program that integrates a compliance-by-design approach into its business activities, supported by comprehensive data protection policies and procedures for managing personal and sensitive data.

The Group provides employee training through the Leonardo platform and live online Teams sessions, complemented by awareness programs and technical solutions to prevent data breaches. EssilorLuxottica ensures its partners contractually adhere to rigorous security standards when processing personal data, particularly for new products and services such as teleoptometry, Ray-Ban | Meta, and their associated applications.

The Group conducts Data Protection impact assessments when required by law, such as when processing activities pose particular risks to stakeholder personal data, involve special data categories, or process personal data on a large scale. It also maintains necessary Data Protection certifications (including ISO 27001 and HDS) when required for product or service sales in specific markets.

Organizationally, a Group Data Protection Office within the Compliance Department centrally monitors data privacy issues, supported by local correspondents (including Local Data Protection Officers) and dedicated committees. As the Group develops AI-powered innovations, such as the Varilux® progressive lens with eye-responsive technology, it actively monitors new regulations and their impact on existing data protection laws to maintain trust and mitigate privacy risks

Privacy Training

During the reporting period, EssilorLuxottica developed new privacy and data protection training modules with specialized content for teams managing consumer experiences (including retail, e-commerce, marketing and CRM staff). These modules cover specific initiatives and events such as Black Friday and Australian Spam Act compliance. A general privacy training program was also created for new employees. Training is delivered in live sessions, in-person, on Teams or on the Leonardo platform.

Employee attendance is monitored by the Group Data Protection Office through attendance reports drafted by the trainer and/or produced by the IT tool involved (Teams or Leonardo). In addition monitoring employee training attendance, users on the Leonardo platform must pass a final knowledge test in order to complete the training.

Role of the Group Data Protection Office

The Group Data Protection Office supports EssilorLuxottica affiliates in identifying (i) the key/at-risk functions to be addressed with appropriate training and awareness actions; (ii) the key/at-risk practices to be addressed with appropriate checks and audits; (iii) the actions to be undertaken in order to enhance DSR management; (iv) new data protection needs to be addressed with appropriate policies and procedures.

Furthermore, the Group Data Protection Office contributes to the improvement of information transparency for consumers and end-users by developing new customer-facing privacy and cookie notices where needed.

In partnership with the Internal Audit function, a new audit was launched in 2024 on a structuring process, and another will be evaluated for 2025 to assess the privacy compliance of business functions playing a key role in the management of consumer and end-user personal data.

Increasing awareness and reinforcing channels

EssilorLuxottica is improving the personal data collection of consumers and end-users by supporting business and operations teams in implementing a deeper granularity in the collection of user consent and management of the unsubscription process. This gives individuals more control over their personal data and how it can be used by EssilorLuxottica to reach them.

In order to ensure effective implementation of data protection principles and rules inside EssilorLuxottica, the Group Data Protection Office can support the relevant EssilorLuxottica/affiliates functions in managing key topics, such as:

- data subject's requests;
- personal data breaches requiring notification to a competent Data Protection Authority and/or to the affected data subject(s);
- exchanges with local Data Protection Authorities;
- development of data protection training.

Data protection by design

The Group Data Protection Office and the local Data Protection Officers support EssilorLuxottica business teams in the implementation of the data protection by design and by default, to the extent possible and taking into consideration the state-of-the-art, the costs of implementation and the nature, scope, context and purposes of the processing, as well as the risks of varying likelihood and severity for rights and freedoms of data subjects posed by the processing.

Additionally, in order to achieve an appropriate level of compliance with the principles defined in the EssilorLuxottica Group Data Protection Policy, the Group Data Protection Office and local Data Protection Officers support relevant EssilorLuxottica business teams to conduct, where appropriate and/or required by law, assessments on personal data processing activities including, where necessary based on the risks of the processing for data subjects or when required under applicable data protection laws and regulations, Data Protection Impact Assessments ('DPIAs').

Data Breach prevention and notification

EssilorLuxottica commits to protect the privacy of its consumers and enhance the protection of their personal data by applying the principles set out in its Group Data Protection Policy and by preventing data breaches from occurring (or by mitigating their adverse effects on the individuals involved in case they occur).

EssilorLuxottica strictly adheres to the laws and regulations in force regarding data breaches in the countries where it operates, which imply that, when required by the law, EssilorLuxottica notifies the competent data protection authorities as well as (where applicable) the affected individuals in the case of a data breach. Additionally, it expediently notifies the Police regarding the occurred data breach in case there is reason to suspect criminal activity behind the breach.

Continuous Improvements

During the reporting period, EssilorLuxottica constantly increased its efforts to mitigate material risks for consumers and end-users by:

- putting at their disposal different channels by which they can raise a concern/exercise their rights pursuant to applicable privacy laws;
- increasing awareness and knowledge within the organization on data protection rules and principles through data protection training/dedicated awareness sessions;
- verifying the application of data protection rules and principles within its organization, through audit and related remediation plans lead by the Internal Audit function;
- supporting the business to improve tools for data collection from consumers and end users by implementing a deeper granularity in the consent collection and in the management of the unsubscription process;
- supporting the business in conducting DPIAs on risky data processing.

In the spirit of continuous improvement, EssilorLuxottica will continue to work on the enhancement of the processes and activities set out above.

3.4.3.7 Targets

Specific targets on data privacy at Group level will be set in due course, but for the time being EssilorLuxottica monitors the effectiveness of its strategy through:

- the governance of the data protection across the Group through the setup of specific committees;
- the continuous assessment of Group's tools and processes from a data protection perspective, by launching, where necessary, audits with the support of the Internal Audit function and/or data protection assessments.
- the enhancement of the effectiveness of exercise of Data Subject's right (for example, by improving the web interface and enlarging its scope both in terms of concerned entities and brands covered), which could also lead to a decrease of the numbers of complaints of Data Subjects to the company and/or the data protection authorities;
- the improvement of the transparency of the communication toward consumers relating to the processing of their personal data (for example through the constant deployment of the Group's notice template to the integrated entities and across the geographies – where possible based on local data protection laws);
- the enhancement of data protection awareness among the employees involved in consumers' data processing, by developing the needed training.

3.4.4 Transparent Communication and Reporting

3.4.4.1 Introduction

Sustainability is an integral part of EssilorLuxottica's DNA, along with its Mission to help people 'see more and be more'. To this end, in 2021 EssilorLuxottica launched its Eyes on the Planet program which outlines the Company's sustainability strategy. Communicating on its commitments, from the Corporate office to our products, allows the Group to differentiate from competitors, build its reputation and loyalty with consumers, meet evolving investor expectations, show compliance with major sustainability regulations and further reinforce the sense of pride and purpose of its employees. As the Group advances on its sustainability journey, it is more important than ever that its approach and efforts are presented in an accurate and consistent way to all audiences and stakeholders, and across all geographies.

3.4.4.2 Material impacts, risks and opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Information-related impacts for consumers and/or end-users	Enhanced customer loyalty	Consumer's access to quality information disclosed by the Group may enhance their trust and loyalty, positively impacting brand perception and leading to higher financial returns.	• Corporate Communication Policy • Corporate Sustainability Communication Policy • Marketing Copy & Claim review	• Number of non-compliance with sustainability related communication regulations
	Risk of non-compliance with upcoming greenwashing regulations	As governments and authorities are narrowing the attention on greenwashing, non-compliance with emerging sustainability and transparency regulations could have negative repercussions on the business, in terms of legal fines and negative financial returns, due to reduction of consumers' trust and the Company's lower credibility.		
Social inclusion of consumers	Granting of eyewear and eyecare access	Granting access to eyewear and eyecare promotes social inclusion by enabling individuals to fully participate in education, work and daily life. Improved vision boosts learning outcomes, enhances job productivity and fosters independence, reducing inequalities linked to uncorrected poor vision.		

3.4.4.3 Policies

EssilorLuxottica is committed to communicating internally as well as externally with its stakeholders and consumers in a clear, authentic way about its sustainability commitments and the sustainability performance of its products and services to avoid any misleading information and ensure compliance with existing and incoming regulations. Therefore, the Group has developed policies and guidelines, available on the Group's intranet and/or shared with the relevant teams, to ensure that its sustainability approach and efforts are communicated accurately and coherently to all stakeholders and audiences in different regions.

Document	Main content	Function	Scope	Availability
Corporate Communication Policy	The purpose of this Policy is to outline the procedures and guidelines that reflect EssilorLuxottica's commitment and approach to communicating and engaging with stakeholders in a manner consistent with the Company Code of Ethics and values.	Corporate Communications	Own operations	Internal
Corporate Sustainability Communication Policy	This document provides an overview of EssilorLuxottica's guiding principles for governing and coordinating the Company's external and internal communication flows regarding sustainability (e.g., publications, social media, tone of voice, official source of information).	Corporate Sustainability & Corporate Communications		
Marketing Copy & Claim review	The purpose of this document is to describe the marketing copy & claim process review at global level. It provides definitions, scope and guidelines to Marketing and Medical Affairs teams responsible for creating/submitting advertising or promotional material.	Legal		

3.4.4.4 Actions and resources

To maintain the accuracy and consistency of messages, EssilorLuxottica has developed and put in place different actions and tools.

Corporate Sustainability Communication

The Eyes on the Planet program is communicated regularly across all EssilorLuxottica Group channels with a clear and targeted strategy. Progress and results are shared through the corporate website, One EssilorLuxottica platform, social media, Digital Windows and Leonardo, each with tailored strategies for internal and external audiences.

An editorial calendar ensures a balanced mix of content, addressing environmental and social topics to enhance understanding of sustainability initiatives, demonstrate the company's commitment, and engage stakeholders, including customers, employees and investors through articles published on the intranet and website. Additionally, the Eyes on the Planet newsletter is sent twice a year, reaching 100,000 employees and providing a recap of the most important projects and initiatives launched during each semester.

Since its launch in 2021, Leonardo has been a beacon of learning about sustainability, providing educational content, available on a dedicated channel to all its learners on the Company's sustainability program Eyes on the Planet. On this channel, both employees and eyecare professionals can find essential tools for continuous learning such as courses, workshops and live events on the occasion of world days dedicated to environmental and social topics, as well as on sustainability reporting requirements.

As a key annual event, the Corporate Sustainability function organizes the 'Sustainability Week', a series of live events held in April in celebration of Earth Day, focusing on the official theme from the Company's perspective. In 2024, the week was centred on two appointments. The first one, titled 'EssilorLuxottica Sustainability and Mission: 2023 Highlights', was about the connection between EssilorLuxottica mission and sustainability, exploring how they continue to strengthen each other as well as 2023 achievements of the Eyes on the Planet program in 2023. It was viewed by 3,388 learners from the Group: employees and customers of its professional solutions network. The second one, titled 'Eyes on the Planet vs Plastic', viewed by 3,724 learners from EssilorLuxottica employees and customers of its professional solutions network, was a discussion around the Group's groundbreaking initiatives aimed at driving plastic circularity and how EssilorLuxottica is pioneering new materials and technologies also actively involving its supply chain.

Visual health education

2024 also marked the opening of the first Leonardo physical Educational Center in France: Leonardo@Créteil. Since its opening in April, it has welcomed 81 professionals from its professional solutions network in France. By obtaining Qualiopi quality certification, Leonardo@Créteil allows participants to co-finance their training with public funds (OPCO), guaranteeing greater accessibility to its programs. Leonardo@Créteil offers educational sessions on technical, sales and management training, aimed at helping the Group's partners to develop their skills as experts in visual health.

Among the added values of Leonardo, there is also its educational offer for products, brand, and lens innovations. Leonardo uses a blended approach to education, combining on-demand content with live sessions, virtual classes and digital services which are available to both EssilorLuxottica clients and employees.

For more information, please see Raising Awareness actions in 3.3 *ESRS S3 – Affected Communities.*

Responsible Marketing

The Company offers many trainings (face-to-face or e-learning) for its sales force, retailers, licensees and eyecare professionals that focus on product features, lens and frames design, quality standards and other aspects. As an example, a specific online training for 'Responsible Communication' has been available for the Company's Central Marketing functions since 2022, to raise awareness of communication challenges related to sustainability, diversity and inclusion as well as provide tools to empower its marketing community to develop and implement more responsible communication campaigns.

In 2023, the Company also formalized and implemented a validation process for product marketing statements to ensure that appropriate proof exists for each of them and that sustainability-related claims are developed according to internal ad-hoc developed guidelines. A request form needs to be filled and presented to the risk evaluation committee, including Legal and Sustainability teams representatives, prior to going live with a sustainability marketing campaign. To ensure compliance with key regulations, claims must also be in line with the overall strategy of the brand as well as in respect of the legal recommendations/risk assessments.

In addition, in 2024, new versions of the 'Alternative materials glossary and claims repository' were shared with product and marketing teams to give them appropriate guidance and examples of communications already developed. Additionally, a review of past sustainability communications still live was performed to re-align them to the most up-to-date guidelines. A new round of updates will be performed in 2025.

It should be noted that due to the diversity of regulations in effect around the world, each of the subsidiaries involved in marketing the Company's products and services may undertake their own monitoring to comply with local laws, standards and voluntary codes in force.

3.4.4.5 Targets

EssilorLuxottica is putting in place frameworks, processes and actions to ensure compliance with regulations and avoid any potential litigation.

4 Governance Information

4.1 ESRS G1 – Business Conduct

4.1.1 Introduction

EssilorLuxottica conducts business based on solid ethical foundations, aiming to establish a relationship of trust with its employees, customers, consumers, suppliers, licensors, investors and franchisees. The principles and 'golden rules' applicable to its employees are enshrined in its internal policies and its Code of Ethics. The Group's expectations also extend to business partners across its supply chain, as outlined in the Business Partners' Code of Conduct. More specifically, EssilorLuxottica maintains a very high level of vigilance and proactivity, including action plans and programs on anti-bribery and corruption and on relationship with suppliers. This vigilance is reinforced by the promotion of an internal 'whistleblowing' reporting system, SpeakUp, which allows employees and external stakeholders to report their concerns about ethics through a third-party platform.

This section provides an overview of policies, actions, metrics and, when available, targets to prevent, mitigate and remediate actual and potential material impacts, to address material risks and/or to pursue material opportunities related to EssilorLuxottica's business conduct, presented in the table below.

4.1.2 Material Impacts, Risks and Opportunities

Material ESG topic	IRO name	IRO description	Policy	Target/Metric
Business ethics and integrity & Responsible sourcing practices	Possible decrease of trust from business partners and employees	Engagement in unethical business practices, violations of whistleblower protection, and unfair treatment of suppliers could significantly erode trust among business partners and employees. The lack of commitment to ethical standards may lead to business partners questioning the company's reliability and commitment to sustainability.	• Code of Ethics • Business Partners' Code of Conduct • Reporting (whistleblowing) policy	• Training activities: number of people trained
	Risk of unethical business practices	Engagement in unethical business practices, violation of whistleblowers protection, or unfair behaviour with suppliers may expose the Company and its value chain to legal fines, reputational damage, and financial harm, as well as undermine the company's long-term sustainability and market position.		
Corruption and Bribery	Risk of ineffective policies related to anti-bribery and corruption	Ineffective Company policies and procedures to prevent bribery and corruption may lead to legal penalties, reputational damage and financial losses if the Group, its employees or its key actors in the value chain are involved in unethical practices, or fail to comply with local and international regulations on anti-corruption. Moreover, ineffective policies could undermine stakeholder trust and damage long-term business sustainability.	• Anti-bribery and corruption policy • Conflict of Interest policy • Anti-money laundering and terrorism financing policy	• Training activities: number of people trained
	Potential unfair advantage compared to competitors	Gaining a competitive edge through unfair means, such as bribing officials or manipulating business practices, could distort market competition, negatively impacting competitors along the entire value chain who operate ethically, in terms of business opportunities and financial returns.	• Antitrust policy	

4.1.3 Policies

EssilorLuxottica is committed to acting in a responsible and ethical manner in all countries where it operates, in line with the provisions of International Labor Organization (ILO) Conventions and the principles of United Nations Global Compact on Human Rights. Employees are called upon to act with integrity and professionalism inside and outside of work, following not only the laws and regulations of the regions where they operate, but also the standards of conduct that the Group has developed over the years and that are embedded in its internal policies and Code of Ethics.

Internal policies and procedures are regularly updated and presented to the Board of Directors through the Audit & Risk Committee. Compliance with such policies from employees of the Group and its controlled entities is subject to Internal Audit's checks. These policies include:

Document	Key content	Function	Scope	Availability
Code of Ethics	The Code of Ethics is applicable to all EssilorLuxottica subsidiaries and employees. Last updated in 2023, it reflects the principles and 'golden rules' that apply to all Group employees and represent a minimum set of standards that cannot be compromised, in the following areas: • respecting people and communities; • conducting business ethically; • protecting our assets; • acting as responsible citizens. It also describes the EssilorLuxottica whistleblowing system SpeakUp and the related protections. It applies and is binding to EssilorLuxottica, its subsidiaries and all their employees, regardless of their position within the Group or location. EssilorLuxottica applies similar principles to temporary and seconded staff of external companies. The document is published and easily available on the Group's website and on the One EssilorLuxottica Group intranet site, making it accessible to all employees and stakeholders.	Compliance	Own operations	Public
Business Partners' Code of Conduct	A separate Code of Conduct was released concomitantly with the Code of Ethics in 2023 and applies to Business Partners in the upstream and downstream value chain, which includes EssilorLuxottica's suppliers, distributors, franchisees, consultants, agencies, service providers, outsourcing partners, hiring agencies, licensing partners and landlords. It is being progressively deployed and new standard contracts and standard terms and conditions strive to include, as far as practicable by leveraging the business relationship, a contractual obligation for business partners to adhere to and comply with the Business Partner's Code of Conduct (or at least to similar standards). The document is published and easily available on the Group's website and on the One EssilorLuxottica Group intranet site, making it accessible to all employees and stakeholders.	Compliance	Upstream and downstream	Public

Document	Key content	Function	Scope	Availability
Anti-bribery and corruption policy	The Group anti-bribery and corruption policy is based on the Group anti-corruption risk mapping and available in 13 languages on EssilorLuxottica intranet. It was submitted to the information and/or consultation of employee representatives in several countries and was integrated in the internal regulation of each of the French entities, in accordance with Sapin II law and released in 2022. It includes the following principles: • the commitment from the Chairman and Chief Executive Officer and the Deputy Chief Executive Officer of the Group, who co-signed the policy; • a description of the Group expectations from its managers, notably the tone at the top and an exemplary behavior; • a description of the Group zero tolerance principle for corruption and the prohibition of facilitation payments and kickbacks; • a description of the various forms of bribes and corruption, including several risk scenarios specific to the Group's activities; • key principles to prevent corruption in specific risk areas, notably concerning public officials, donations and sponsorships, gifts and hospitality, lobbying and political contributions, conflict of interest, with several risk scenarios and do's and don'ts; • practical steps to prevent the risk of corruption with third parties at risk, notably vendors, consultants, distributors/wholesale customers, intermediaries, as well as in relationship with licensors, franchise partners and in the retail activities and in M&A processes and joint venture partners. It includes steps such as integrity due diligence, contractual clauses, and a description of risk scenarios specific to the Group's activities; • governance and control framework, including the possibility for employees to confidentially report violations on SpeakUp, EssilorLuxottica's internal reporting channel system.	Compliance	Own operations	Internal – Guidelines published on Group's website
Conflict of interest policy	The Group Conflict of interest policy is made available to all employees of the Group in eight languages. It was adopted further to information/consultation of relevant employee representatives. The policy includes a definition of conflict of interest, with several practical examples relevant to the Group's activity, as well as a conflict resolution guidance, a declaration process for employees at risk and a model declaration form. Group subsidiaries are required to ask new recruits to declare potential or actual conflicts of interest and to organize declaration campaigns every other year. In 2024, EssilorLuxottica also implemented a new conflict of interest declaration tool which will be progressively deployed.	Compliance	Own operations	Internal
Anti-money laundering and terrorism financing policy	In 2024, EssilorLuxottica launched a new anti-money laundering and terrorism financing (AML-FT) policy setting out: • the Group's zero tolerance for money laundering and terrorism financing; • a description of the main business risks incurred and how to address them; • rules relating to payment means; • specific due diligence requirements, based on country risk, the type and amount of transaction; • an exception procedure to address specific situations, with a specific approval process involving various functions in finance and compliance; • a description of controls, internal reporting and escalation procedures, and record keeping.	Compliance	Own operations	Internal

Document	Key content	Function	Scope	Availability
Antitrust policy	The Group competition compliance policy, available in eight languages, was adopted in 2022 further to information/consultation of relevant employee representatives and was included in the internal regulation of certain subsidiaries in France. It describes: • a clear commitment of the Chairman and CEO and of the Deputy CEO of the Group to compliance with competition law; • the key competition law risks for the Group and the key concepts of competition law; • the competition law rules relevant to the Group including anticompetitive agreements between competitors and exchange of information involving competitors (with several examples of unlawful practices and a focus on intra-group exchange of information and the need for specific wholesale/retail vigilance, as well as the participation to trade associations), vertical agreements and unlawful practices for companies in a situation of dominance; • specific rules of conduct and obligations to follow training.	Compliance	Own operations	Internal
Reporting (whistle-blowing) Policy	In 2022, EssilorLuxottica released its Group Reporting Policy, in accordance with the European directive on the protection of whistleblowers, which is publicly available in 10 languages in its online reporting system SpeakUp. Where required, appropriate consultation of employee representatives was conducted. The policy is being progressively 'localized' to take into effect the specific transposition of the directive in the European Union; a North America version was also issued. The policy clearly and transparently describes the reporting process and the statutory protections granted to whistleblowers and facilitators, the principles of personal data protection for the purposes of the reporting process, and the governance, reporting and audit procedures.	Compliance	Own operations and value chain	Public

4.1.4 Governance

Compliance Organization

EssilorLuxottica's Compliance function is responsible for preventing, identifying and managing risks related to business ethics in compliance with the law, and applicable local and international regulations (see Chapter 2 of the 2024 Universal Registration Document), and for establishing, developing and promoting a culture of compliance across the Group. The Compliance function is notably responsible for the following pillars:

- Ethics Compliance (anti-bribery and corruption, gift & hospitality, conflict of interest, lobbying, anti-money laundering, donations, sponsorship, Code of Ethics and Business Partners' Code of Conduct);
- Personal Data and Privacy;
- International Sanctions and Export Control.

It closely collaborates with the Corporate Sustainability function, the Responsible Sourcing function and other functions in relation to Human Rights and Modern Slavery, Conflict Minerals and other matters related to the value chain compliance.

The Compliance function is also responsible for drafting and deploying, in collaboration with other functions, the Group compliance policies in those matters and the Group Code of Ethics and the Business Partners' Code of Conduct, and oversees the Group whistleblowing system SpeakUp.

The Compliance function includes dedicated corporate teams corresponding to each of its pillars as well as dedicated compliance teams in each region, based in several countries and states in Europe, North America, Latin America and Asia Pacific who are responsible for localizing, where needed, and deploying the Group compliance programs in their respective regions. The Compliance department is also building specific expertise in each region to strengthen the Group healthcare compliance policies and a network of Compliance Liaisons embedded across the organization, through different business units and geographies, to be the local point of contact and advocate for the program. In 2024, as part of the Group integration process, GrandVision compliance and privacy teams were integrated into the scope of the Compliance function.

Since March 2024, the Compliance function directly reports to the Chief Financial Officer, and has direct access to the Group Chairman and Chief Executive Officer and the Deputy Chief Executive Officer. Moreover, the Head of Compliance regularly updates the Audit & Risk Committee of Board of Directors.

Competition law and antitrust compliance topics are managed by a separate specialized department reporting to the Chief Legal Officer, and in charge of developing and implementing the Group Competition law compliance policy and the related training.

Governance body and Procedures and Control Management

As described in Chapter 4 of the 2024 Universal Registration Document, the Audit and Risks Committee of the Board of Directors is also in charge of reviewing compliance risks and program. The Head of Compliance attends the Audit and Risk Committee's meetings and presents compliance updates twice a year, and has direct access to the Chairman of the Audit and Risk Committee. In 2024, the following topics were discussed with the Audit and Risks Committee:

- update on the Compliance organization;
- presentation of the Compliance key projects and strategic activities for 2024, for each compliance pillar;
- report on SpeakUp whistleblowing activities (anonymized);
- update on personal data incidents;
- update on the deployment of the Code of Ethics, compliance policies, SpeakUp and Conflict of interest new module;
- update on the compliance training program and first results of the new e-learning trainings launched in 2024;
- update on compliance with economic sanctions.

In 2024, the Procedures and Control Management department was created to further structure, centralize and enhance the consistency and review of corporate policies and procedures by the relevant subject matter experts. Directly reporting to the Chief Financial Officer, this function monitors the publication of policies and procedures and ensures their proper implementation across Group entities and geographies, through adequate communication, training, controls and quarterly updates with stakeholders.

Moreover, at the initiative of the Group Internal Audit function, a cross-functional task force of key functions including Internal Audit, Internal Control, Legal Affairs, Corporate Sustainability, Risk Management, Compliance, Procedures & Control Management and Human Resources, meets each quarter to enhance the collaboration on common interest topics such as corporate sustainability reporting, risk assessment, Human Rights, fraud prevention or whistleblowing. Other functions may be included in the participants if relevant to the projects on the agenda.

Internal stakeholder engagement

The Code of Ethics and the Business Partners' Code of Conduct, as well as the policies described in this section, were created under the ownership of the Compliance function, with the involvement of several internal stakeholders including without limitation Human Resources, Legal, Corporate Sustainability, Asset protection, Risk Management, Health & Safety, Intellectual Property, Internal Audit, Internal Control and Corporate Communications functions. In particular, the Code of Ethics was submitted and approved by the Chairman and CEO and the Deputy CEO of the Group.

The Code of Ethics and most of the policies described in Section 4.1.3 *Policies*, as well as the internal reporting system SpeakUp, were also submitted to the information and/or consultation of employee representatives in several countries, including in France and Italy, and some of the French entities have incorporated the Code of Ethics in their internal regulation.

Promotion of an ethical culture

The promotion of EssilorLuxottica's ethical culture and policies is an ongoing process and relies on the below communication channels.

- Publication of policies in several languages, consistently with the target population and the type of risk addressed by each policy. For instance, the Code of Ethics is currently available in 19 languages and the Business Partners' Code of Conduct is available in 13 languages. The publication of the policies and of the Code of Ethics, as well as the launch of the internal reporting system SpeakUp, was announced globally through the internal communication systems (newsletters, digital windows) and dedicated campaigns are being conducted at corporate level and locally.
- Communication about the internal reporting system SpeakUp: communications and presentation of the SpeakUp reporting system are systematically associated to communication about the Code of Ethics.
- Tone from the top. The Code of Ethics is designed and deployed with the involvement of the Group's top executives, starting with the Chairman and CEO and the Deputy CEO. The tone from the top and exemplarity is also expected from the middle management. The Compliance department regularly holds internal information sessions to executives and key managers of the Group in all regions. Communication kits and templates are also available, including standard communications, posters and Q&A for managers and employees.
- Training of employees and other stakeholders. Managers are expected to ensure that employees in their teams complete the mandatory trainings (including, among others, training on Code of Ethics, on Anti-Bribery and Corruption). Reminders are also sent out to target populations to ensure completion of the training activities.
- Development and test of an integrated conflict of interest's declaration module, on the Group HR portal.
- The listening program *Your Voice – Culture Insights*, as explained in Section 3.1.2.4 *Processes for engaging with own workers and workers' representatives*, gathers valuable insights to measure Sense of Belonging, Culture adoption & transformation and employee experience on their daily work-life.

4.1.5 Actions, Resources and Procedures

EssilorLuxottica has set up multiple actions to ensure its ethical approach is respected and embedded in the Group's culture. The actions are described in the following paragraphs and include the internal reporting platform SpeakUp along with the definition of a reporting procedure, defense lines to identify breaches of the Code of Ethics, anti-bribery and corruption programs and training initiatives.

4.1.5.1 SpeakUp reporting system

SpeakUp is an internal and secure online reporting platform hosted by a third-party vendor, accessible to all employees of the Group and external stakeholders (to the extent required notably by the Directive EU 2019/1937), via a computer or a mobile application, or (in 11 countries) by phone (external call center). SpeakUp is mentioned in the Code of Ethics and in the Business Partners' Code of Conduct, and is public and easily accessible from the Group's corporate website. Specific posters, available in 26 languages and displayed in offices, stores and operations, clearly mention how to report and on which matters it is possible to report, as well as the possibility to report anonymously and without retaliation.

EssilorLuxottica is subject to legal requirements with regard to protection of whistleblowers, in accordance with the applicable laws transposing Directive EU 2019/1937 and with other applicable laws. The protections are extended to all employees as per EssilorLuxottica's Reporting Policy.

SpeakUp allows the reporting of concerns relating to unlawful behavior or breaches of the Code of Ethics in the following areas:

Accounting & Financial	Accounting, auditing, financial reporting, falsification of records
	Tax
Business Ethics	Anti-trust or competition law concerns
	Bribery & corruption/gift & hospitality/lobbying
	Conflict of interests
	Human Rights violation/child labor/forced labor
	Insider trading/stock exchange violation
	Money laundering and terrorism trafficking
	Personal data protection and privacy
	Trade sanctions/export control/customs
	Violation of anti-kickback/anti-gift laws (healthcare professionals)
HR, Diversity and Workplace Respect	Collective bargaining rights
	Discrimination
	Harassment and/or bullying
	Retaliation of whistleblowers/reporters
	Sexual harassment
	Substance abuse
	Wage/time theft/overtime
	Workplace violence – Assault, threat, vandalism
EHS, Consumers & Products	Consumer protection
	Product quality and safety
	Violation of environmental laws
	Workplace Health & Safety issues
Asset Protection	Brands or other intellectual property violation
	Fraud and embezzlement
	Security of IT, networks and information systems
	Theft – theft of cash – misappropriation of assets

The investigation process is described in detail in EssilorLuxottica's Group Reporting Policy, which is publicly available on SpeakUp, and can be summarized as follows:

Reporting an Alert	• The Reporter **files a Report** through one of the Reporting Channels • The Reporter receives a notification **acknowledging receipt** of the Report
Admissibility of the Report	• The Authorized Recipient assesses the **admissibility** of the Report in accordance with the Policy • The Authorized Recipient may request **additional information** to the Reporter • If the Report is considered admissible under the Policy, the Authorized Recipient **designates an Investigator**
Investigation	• The Investigator will conduct **factual verifications and investigations** which may inter alia include interviews and internal enquiries • The Reporter will be contacted by the Investigator and informed on ways to contact the Investigator and on the envisaged follow-up measures • At the end of the Investigation, the Investigator may elaborate an **Investigation Report** describing the facts, undertaken verifications, the reasons for the breach,concluding on the facts and recommending measures • The Investigation Report is transmitted to the Compliance Department and the relevant Ethics & Compliance Committee
Outcome of the Investigation	• At the reception of the Investigation Report, the **Ethics & Compliance Committee**: - validates the findings of the Investigation Report or request additional investigation measures - validates or revises the recommendations proposed by the Investigators - validates or revises the disciplinary sanctions and/or judicial actions proposed by the Investigator • The **recommended action(s)** are transmitted to the relevant HR Department and/or relevant management • The HR Department or management **implement the recommended action(s)** or document in writing the reasons for not complying with such recommendations • The note is transmitted to the Compliance Department

The Group's Reporting Policy, available in several languages, provides employees with transparent information on whistleblower protections. The Group procedures protect the confidentiality of reports and allow anonymous reporting (where permitted by applicable legislation). As mentioned in its Reporting Policy, the Group also seeks to ensure impartiality of the investigation and the absence of conflict of interest of investigators.

The Group prohibits retaliation, as mentioned in its Reporting Policy, in the home page of the SpeakUp platform, in the Q&As circulated to employees and in its Code of Ethics and Business Partners' Code of Conduct. The other measures to protect employees against retaliation – mentioned in the Code of Ethics and in multiple Group policies – include, for instance:

- training of investigators and regular reminders, for example when investigators are appointed;
- Group procedures and strict access management of the platform;
- a protection of the confidentiality of the identity of the whistleblower through a careful planning and conduct of the investigation itself, and through standard operating procedures and standard interviews framework;
- information of whistleblowers that if they feel retaliated against as a result of their report, they should contact the compliance department or file a new report;
- setting of automatic reminders, where deemed necessary, in the SpeakUp platform, to proactively contact whistleblowers that may be at risk.

If the internal investigation confirms the existence of misconduct, remedial and disciplinary actions may be taken. The SpeakUp tool will facilitate global data collection, enabling Group compliance programs to be adapted to the reports received. An anonymous annual report is submitted to the Group's governance bodies.

Training programs for employees and investigators (employees from selected functions with specific skills, trained to analyze, conduct interviews, evaluate documents and prepare reports) have also been set up in 2024. The programs include training on the applicable regulations and whistleblower protections, practical guidance about how to conduct an investigation and use of the SpeakUp platform.

4.1.5.2 Business ethics and integrity

Identification of unlawful behavior or breaches of the Code of Ethics

Identification of breaches is possible through the three lines of defense set up in the organization and described in the Code of Ethics:

- 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 the Code of Ethics;
- second line of defense: Control Functions (e.g., Internal Control, Risk Management, Compliance). 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;
- 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.

In addition to the SpeakUp reporting system described above, employees are encouraged to report concerns about unlawful behavior or ethical breaches to their line manager and/or to the Human Resources department, the upper-level manager or the Compliance function, as per the Company's culture of dialogue and communication.

Procedures to investigate business conduct incidents

For incidents of alleged bribery and corruption, the Group seeks to apply similar investigation procedures as in its Reporting Policy, and to investigate them promptly, independently and objectively. Compliance and Internal Audit generally conduct such investigations, with appropriate legal privilege safeguards. When it comes to incidents requiring forensic research in information technology tools, specific access procedures are in place to protect personal data and privacy laws.

4.1.5.3 Prevention and detection of bribery and corruption

In the fight against corruption, the Group applies a zero-tolerance policy and communicates this widely through its Group anti-corruption policy, based on its cartography of corruption risks, and its Code of Ethics.

EssilorLuxottica's Compliance function oversees the definition of guidelines for the prevention, identification and management of corruption-related risks through its Sapin II risk mapping. This mapping will be updated in 2025 to take into account the organizational changes within the Group and to involve GrandVision entities more closely. The Compliance function will adapt its internal prevention procedures accordingly. Investigations are managed according to EssilorLuxottica's Group Reporting Policy.

Bribery and corruption allegations reported in SpeakUp, as well as business ethics and fraud or accounting allegations disclosed in SpeakUp, are reported (after anonymization) twice a year to the Group Statutory auditors and the Supervisory Bodies pursuant to D.Lgs. 231/2001 in Italy and to internal audit by the Compliance function. Serious business ethics violations (based on a threshold value agreed upon with the Audit and Risk Committee) are reported (after anonymization) to the Audit and Risk Committee.

The main functions considered most at risk in respect of corruption and bribery are inferred from EssilorLuxottica's anti-corruption risk map:

- employees in touch with public officials (in charge of licenses and permits, taxes, customs, logistics, Research & Development);
- commercial teams exposed to the risks of kickbacks or healthcare professionals;
- sourcing and procurement functions; however, EssilorLuxottica has a very low exposure to public procurement;
- real estate teams, facility management teams;
- Human Resources teams;
- joint ventures;
- functions exposed to cash payments.

EssilorLuxottica has implemented anti-bribery and corruption programs as described before.

4.1.5.4 Training on business conduct and anti-corruption

The Compliance function provides several types of training, both face-to-face and via the Leonardo Group's learning and development platform. Numerous face-to-face training courses were held in 2024, in particular on the fight against corruption in high-risk regions (Latin America, South-East Asia) and on the protection of personal data (specific training for certain functions deemed to be particularly exposed).For more details see Section 3.4.3.6 *Actions and resources*. In 2024, the Group gave priority to the following trainings on the Leonardo platform:

- awareness sessions for Human Resources and executives at corporate or regional/local level;
- privacy and data protection trainings (see Section 3.4.3.6 *Actions and resources*).

Training	Anti-corruption training included in the Code of Ethics training (launched Q2 2024)	Specific anti-corruption training
Targeted employees	All white-collar employees	All managers
Key content	• Key principles, zero tolerance principle and risks of corruption • Practical examples related to bribery and corruption (public officials and commercial corruption/kickbacks) • Key rules of conduct including integrity due diligence • Reporting of violations through SpeakUp • Key principles about gift and hospitality and conflict of interest	• Key definitions, zero tolerance principle and risks of corruption • Prevention of the risk of corruption (notably public officials, gift & hospitality, donations & sponsorship, lobbying and political contributions) • Due diligence on third parties at risk and red flags • Documentation and record keeping • Reporting of violations through SpeakUp • Quiz to validate the e-learning, and several risks scenarios and examples related to the activities of the Group
Number of employees trained in 2024	18,558	8,521
% of functions at risk covered	Information not available in the system, but by covering all white-collar employees, the Group will cover all functions at risk.	Information not available in the system, but by covering all managers, the Group will cover all functions at risk.

In 2025, specific training formats will be implemented to cover top managers and training format to members of the supervisory bodies are under discussion.

4.1.5.5 Management of relationships with suppliers

Information on Responsible Sourcing are provided in Section 3.2 *ESRS S2 – Workers in the Value Chain*.

Considering the international footprint of EssilorLuxottica, the payment terms for services and goods can vary significantly among regions. In addition, the general terms and conditions agreed through commercial agreements with suppliers might also affect the payment terms which, in some cases, have been extended for suppliers that decided to join the voluntary supply chain finance programs. Payables with extended payment terms, as described in Chapter 5 of the Registration Document, Note 23.2 *Other Current Liabilities* to the Consolidated Financial Statements, amount to €388 million as of December 31, 2024, representing approximately 15% of the year-end Group's trade payable.

The Group is engaged to comply with the applicable local regulations and to avoid or reduce instances of late payments toward its suppliers, without any distinction between large, medium, or small enterprises. At the same time, the Group is dedicating resources and investments to improve the monitoring of specific KPIs, promote trainings and workshops to employees, and fine-tuning the underlying processes and tools.

With respect to legal proceedings for late payments, the Group is not aware of any material case currently outstanding.

New suppliers undergo a pre-qualification process and are being assessed on different criteria including on sustainability, e.g., through on-site responsible sourcing audits. Only upon approval, the supplier can start a business relationship with EssilorLuxottica.

4.1.5.6 Next steps

Building on the accomplishments described in this section, in 2025, EssilorLuxottica's priorities in the business ethics field include:

- continuing the deployment of the Code of Ethics and Anti-bribery and corruption training, targeting a 85% completion rate;
- deployment/enhancement of new anti-corruption training specific to functions at risk and for third parties at risk;
- launch of a conflict of interest declaration campaign, for functions at risk, targeting all entities on SAP;
- preparation of new policies relating to donations and sponsorship, lobbying and political contributions;
- update and extension of the Sapin II anti-corruption risk mapping;
- enhancing the third-party integrity due diligence process.

4.1.6 Targets and Metrics

Specific targets covering such ESG topic, including due diligence, will be set in due course.

To the best knowledge of EssilorLuxottica, there was no conviction or fines for violation of anti-corruption and anti-bribery laws in 2024.

5 Methodology Note

Main Principles for Sustainability Data Reporting

EssilorLuxottica's Sustainability Reporting Protocol defines the reporting principles below:

Workforce-Related Indicators

The workforce reported corresponds to the total number of Company employees and agency workers at the end of the reporting period. Workforce-related indicators cover 100% of the total Group workforce, excluding 2024 latest acquisitions (Heidelberg Engineering and Supreme).

As defined in the EssilorLuxottica Reporting Protocol, 'employee' refers to a person having an employment contract directly with any entity of EssilorLuxottica; and 'agency worker' refers to a person having a contract with an outside company to work for EssilorLuxottica in one of its locations or elsewhere for a temporary period. Contractors and interns are excluded from the workforce indicators.

The breakdowns (by region, gender, category, contract type and age) are presented only for employees. Geographical areas designated for presenting the workforce by region are aligned with the areas identified for 2024 revenue disclosure.

'Turnover rate' represents the total number of permanent employees who left the Group over the reporting period. For 2023, GrandVision was excluded but is included in 2024.

Locally managed data covers 93% of the Company's headcount.

Health & Safety Indicators

Health & Safety indicators relate to the Company's manufacturing plants, lens laboratories and distribution centers (excluding entities acquired by EssilorLuxottica during 2024 and for which investments are needed to integrate Health & Safety reporting systems). For Operations and other activities, reported information covers 87% of the population. For retail activities, reported information covers 82% of the population, increasing significantly the coverage compared to last year. In 2023, in fact, the Group started to include Brazil, US and Italy in the Health & Safety reporting, while in 2024 almost all the Latin-America retail entities are included and the EMEA countries integrated have been largely expanded.

Health & Safety indicators cover both employees and agency workers.

The indicators applied reflect results of the Company's Environment, Health & Safety (EHS) policies.

As defined in the Company's Reporting Protocol:

- the frequency rate is calculated as the number of work-related injuries with lost days x 1,000,000/total number of hours worked during the reporting period;
- the severity rate is calculated as the total number of lost days (calendar days) x 1,000/total number of hours worked during the reporting period;
- the total recordable incident rate is calculated as the total number of recordable work-related injuries x 1,000,000/total number of hours worked during the reporting period;
- the total number of hours worked is calculated as the actual hours worked from the clock-in system where applicable, and theoretical hours worked based on calculation of scheduled working days and average number of hours worked per day.

Environmental Indicators

Environmental indicators are collected to measure and monitor the environmental performance of the Company.

Energy

Energy consumption refers to all primary energy consumed during the reporting period. Related breakdowns are reported in kWh and disclosed in GWh.

- Operations: the Company collected all the available actual data during the reporting period and extrapolated the data for the residual entities not providing data. This approach enables the representation of the GHG emissions for the entire Group. The extrapolations have been performed based on the actual data collected, calculating the average consumption per headcount and per country.
- Retail: All directly managed retail stores as of June 30, 2024 (around 13,500 stores) are covered in the energy reporting. Data was reported for 10 months and extrapolated for the last two months. When energy consumption data was not available for the full reporting period, data was extrapolated and estimated based on the average energy consumption per m^2 of other stores of the same country or the same region.

In total, 19% of the energy consumption has been estimated.

Besides, the Group used the Ember database for the electricity mix of the different countries where it operates to disclose the energy types breakdown.

Water resources

Water withdrawal refers to all water drawn into the boundaries of the Company from all sources, for any use, over the course of the reporting year. The related breakdowns are reported in m^3.

- Operations: the Company collected all the available actual data during the reporting period and extrapolated the data for the residual entities not yet providing data. The extrapolations have been performed based on the actual data collected, calculating the average consumption per headcount and per country. 10% of the consumption has been estimated, thus 90% is from direct measurement.
- Retail activity water consumption is fully estimated based on benchmarking analysis and comparison with factors found in literature.

Resource use and circularity

Waste

- Operations: waste generation refers to the total weight of waste evacuated or shipped out of the Company. Associated breakdowns are reported in metric tons. The Company collected all the available actual data during the reporting period and extrapolated the data for the residual entities not yet providing data. This approach enabled the representation of the GHG emissions for the entire Group. The extrapolations have been performed based on the actual data collected, calculating the average consumption per headcount and per country. 12% of the waste generation has been estimated.
- Retail: waste generated are excluded from the consolidation.

Regarding the percentage of biological materials (and biofuels used for non-energy purposes) and percentage of secondary reused or recycled components, secondary intermediary products and secondary materials:

- the requested information has been calculated considering only plastic frames and plastic plano lenses perimeter – in terms of tons of materials purchased in 2024;
- prescription lenses perimeter is excluded: the principle of exclusion is not linked to unavailability of data but rather to the fact that, consistently to what explained above, application of biological and recycled materials to medical devices like prescription lenses is still a challenge and EssilorLuxottica prioritizes quality. The main sustainability lever for prescription lenses is waste reduction;
- for 'biological materials' the following materials for frames and plano lenses have been considered: Bio-based acetate, bio-recycled acetate, Bio-polyamide (PA) and bio-rubber (TPE);
- for 'secondary materials' the following materials for frames and plano lenses have been considered: recycled acetate, recycled nylon, bio-circular polycarbonate and recylced Polymethyl methacrylate (PMMA).

As far as the rates of recyclable content in products are concerned, the KPI has been calculated taking into consideration EssilorLuxottica manufacturing output of sunglasses and prescription glasses, sun lenses and prescription lenses, expressed in tons of material. The percentage takes into account what is currently recyclable according to EssilorLuxottica standards (valorizing the materials), for each product category. Products that are not manufactured internally have been excluded. These are based on direct measurement.

Methodology for Calculating Greenhouse Gases (GHG) Emissions

In accordance with GHG Protocol, accounting and reporting standards for greenhouse gas emissions (http://www.ghgprotocol.org GHG emissions) are calculated and reported according to three scopes: Scopes 1, 2 and 3. The GHG emissions reported include CO_2, CH_4, N_{20}, HFC and PFC are measured in tonnes of carbon dioxide equivalent (tCO_2e).

The GHG emissions are calculated considering the actual data collected during the reporting period and the extrapolated one for the entities that did not report data, as explained in the methodology of environmental indicators.

Scope 1

This involves three direct emission categories:

- emissions from direct on-site stationary combustion of fossil fuels, such as gas or liquid fuel: Associated upstream emissions are considered Scope 3 emissions and thus excluded from Scope 1 emissions. GHG emission factors were applied in accordance with the Ecoinvent (v. 3.9.1), BEIS, DEFRA, and ISPRA databases.
- emissions from mobile combustion related to company cars consuming fossil fuels: Emissions are calculated on contractual data provided by the main fleet management supplier. Information not available from this supplier (15%) has been extrapolated. The Group refers to the fuel consumed to calculate the emissions from mobile combustion related to company cars.
- fugitive emissions from refrigerants leakages that may occur during the charging, recharging or disposal of refrigerant or air conditioning equipment on-site: Emissions are calculated considering the GWP of each F-gas from the IPCC Sixth Assessment Report (AR6). In the case of GWP not available in the IPCC report, the information provided directly from the F-gas supplier was considered. The consumption of Operations sites that did not report data (representing approximately 13% within the Scope) has been estimated based on headcount.Regarding Retail, 57% of data have been collected through actual records, while the residual part has been estimated based on the presence of cooling system and m^2 of stores.

Scope 2

This relates to indirect emissions associated with the electricity consumption of the Company's activities, including electric vehicles owned or controlled by the Company. Scope 2 emissions were calculated according to both the location-based method and the market-based method of the GHG Protocol. A location-based method reflects average emissions intensity of grids for which energy consumption occurs (using mostly grid-average emission factor data). The emission factors for electricity were updated in 2024 based on figures provided by the 3.10 and 3.9.1 versions of Ecoinvent. A market-based method reflects emissions from electricity that the Company has purposefully chosen.

The emission factors considered are annually updated referring to residual mix from Ecoinvent and AIB report. If the residual mix is not available, the emission factors from the location-based method are used.

Scope 3

Emissions Associated with Purchased Goods and Services

These emissions correspond to indirect emissions from the entire supply chain of purchased goods and services, from raw material extraction to the point of purchase by the Company, representing the 3.1 GHG Protocol's category 'Purchased goods and services'.

In 2024, the category's emissions associated with tangible products (goods) are computed based on the average-data method for 75% of the emissions, while the residual part is calculated for 15% based on a spend-based method and for 10% based on supplier-specific method.

Where possible, GHG emissions have been calculated using a mix of supplier-specific data and secondary data (industry averages, emission factors) obtained from Ecoinvent (v. 3.9.1), with elaboration based on scientific literature and/or expertise judgment or LCA studies for similar products when Ecoinvent data is not available.

The category's emissions associated with intangible products (services) are computed based on the spend-based method. The emission factors considered derive from Exiobase (v. 3.3) and Base Empreinte®, Ecological Transition Agency of the Republic of France (Agence de la transition écologique – ADEME) (v. 22.0).

Data on purchased goods are collected referring to a 10, 11 or 12 months period, depending on their internal availability at year-end. For example, if 10 months data are collected, the remaining two are then proportionally extrapolated to cover 12 months. In 2024, the percentage of emissions calculated with actual data amounts to 96%. The residual part has been extrapolated based on available actual data. Data on purchased services are collected referring to a 12 months period.

The data collected directly from suppliers cover the 7% of this category's emissions, while the residual part is collected referring to internal sourcing report and ERP system.

Emissions Associated with Capital Goods

These emissions correspond to indirect emissions related to the production of capital goods purchased or acquired by the Company during the reporting year, representing the 3.2 GHG Protocol's category 'Capital goods'. EssilorLuxottica reports the total cradle-to-gate emissions of these goods in the year they are acquired, without depreciating or amortizing these emissions over time. The category's emissions are fully computed with the spend-based method. Applied emission factors are sourced from Exiobase (v. 3.3) and measured in tonnes of CO_2-equivalent per EUR (based on 2023 Euro value sourced from Central European Bank).

Emissions Associated with Fuel- and Energy-Related Activities

These emissions correspond to indirect emissions related to the consumption of fuel and energy in the Company's activities, representing the 3.3 GHG Protocol's category 'Fuel-and-energy related activities'. This category's emissions are computed on an average data method, referring to the data collected and extrapolated for the Scope 1 and Scope 2 calculation. The emission factors considered are annually updated referring to residual mix from Ecoinvent and AIB report. Emission factors used to calculate upstream emissions of purchased electricity do not include emissions from combustion, as emissions from combustion to generate electricity are accounted for in Scope 2. Transportation & Distribution loss rate is included.

The data considered for this category are the one collected for the environmental KPIs above mentioned.

Emissions Associated with Upstream Transportation Managed by EssilorLuxottica

These emissions correspond to indirect emissions related to the transportation of products and represent the main contributor for the Company to the 3.4 GHG Protocol's category 'Upstream transportation and distribution'. The emissions associated with upstream transportation managed by EssilorLuxottica are calculated on a Well-to-Wheel basis (WTW), to analyze the impact of using different energy vectors. The term Well-to-Wheel includes the underlying Tank-to-Wheel and Well-to-Tank analyses, defined as follows: i) Tank-to-Wheel (TTW) describes the use of fuel in the vehicle and emissions during driving; and ii) Well-to-Tank (WTT) describes the subrange of fuel supply, from production of the energy source (petrol, diesel, electricity, natural gas) to fuel supply (transport to the charging point or fuel pump).

The company follows the GLEC Framework 3.0 and is certified to use ISO 14083 standard.

Reporting of EssilorLuxottica transportation and freight is categorized by product type:

- eyewear: finished frames, including both international and local flows;
- lenses: finished and semi-finished lenses, including both international and local flows; and
- other products/materials: including international and local flows for AFA (Apparel, Footwear and Accessories), POP (Point of Purchase), Spare Parts, Production Components, Goggles, Contact Lenses, Sun & Readers, Equipment, Instruments, Cases and Accessories.

Emissions related to the transportation and freight of each product type are also split per shipping mode:

- air shipping mode; and
- other shipping modes, including ocean, road and rail.

For certain entities that did not report physical transportation data on the full 12 months, GHG emissions were estimated based on average of the available 2024 data (actual weight/emission segmented by business unit, transport mode and flow). Emissions based on estimations accounted for less than 5% of the total reported emissions associated with transportation.

Emissions Associated with Upstream Transportation Managed by Suppliers

These emissions correspond to the Scope 1 and Scope 2 emissions of third-party transportation companies (allocated to the reporting company that pays the service). The emissions associated with upstream transportation managed by suppliers are calculated with the distance-based method, which involves determining the mass, distance, and mode of each shipment, then applying the appropriate mass-distance emission factor for the vehicle used. The model has been developed using different online distance calculators (Google Maps, Distance calculator; www.searates.com). Emission factors applied derive from Ecoinvent (v. 3.9.1).

Data are collected referring to a 10, 11 or 12 months period, depending on their internal availability at year-end. For example, if 10 months data are collected, the remaining two are then proportionally extrapolated to cover 12 months. In case countries and freight types information were unknown, a worldwide distance and emission factor average was applied. In 2024, the percentage of emissions calculated with actual data amounts to 96%, as per purchased products (goods) data. The residual part has been extrapolated based on available actual data.

The data collected directly from suppliers cover the 7% of this category's emissions, while the residual part is collected referring to internal sourcing report and ERP system.

Emissions Associated with Waste Generated in Operations

These emissions correspond to indirect emissions related to the generation of waste in the Company's activities, representing the 3.5 GHG Protocol's category 'Waste generated in operations'. This category's emissions are computed on a average-data method, which involves estimating emissions based on total waste going to each disposal method (e.g., landfill) and average emission factors for each disposal method, and refer to the data collected for the Waste generation table reported in the Section 2.4.6 *Targets and Metrics*. To ensure the coverage of all the Company's operations activities, the waste generated by entities that have not reported data in the reporting campaign was estimated based on the actual data available by country and region. The emission factors considered derive from Ecoinvent (v. 3.9.1).

Emissions Associated with Business Travel

These emissions correspond to indirect emissions related to all modes of transportation used for business travel, including air travel, rail travel, bus travel, and car rentals, representing the 3.6 GHG Protocol's category 'Business travels'. For the specific case of EssilorLuxottica, the following modes of transportation are considered:

- air travel: emissions from flights taken by employees for business purposes;
- rail travel: emissions from train journeys.

Since only car rental expenses are available, and the mode of transportation represents a smaller amount compared to other types of travel, it has been excluded from the reporting boundaries. The impacts related to hotel accommodations are also excluded from the assessment. In both modes of transportation considered, the category's emissions are calculated with the distance-based method.

Data are collected referring to a 10 months period. Thus, the percentage of emissions calculated with actual data amounts to 83%, while the residual part has been extrapolated based on the available actual data.

Emissions Associated with Employees Commuting

These emissions represent the 3.7 GHG Protocol's category 'Employees commuting and teleworking'. The reporting corresponds to indirect emissions related to the transportation of employees between their homes and their worksites, and considers all modes of transportation used by employees to commute. Since the indirect emissions associated with teleworking are considered as optional for the GHG Protocol and they are not particularly significant in terms of emissions for the Group, teleworking indirect emissions are excluded in this category.

To compute the category's emissions an average-data method is applied, which involves estimating emissions from employee commuting based on statistical average data on commuting patterns. The statistical information considered refers to a limited number of countries, and the related results have been assumed valid for the worldwide data collected. Emission factors sourced by Ecoinvent (v. 3.9.1) are associated based on mode of transport statistics. This category's emissions do not include any extrapolation.

Emissions Associated with Processing of Sold Products

These emissions correspond to indirect emissions related to the processing of sold intermediate products by third parties after the Company has sold them, representing the 3.10 GHG Protocol's category 'Processing of sold products'. The category's emissions are calculated with the average-data method. Emission factors have been developed based on internal LCAs. This category's emissions do not include any extrapolation.

Emissions Associated with Use of Sold Products

These emissions correspond to indirect emissions related to the use of goods and services sold by the Company in the reporting year, representing the 3.11 GHG Protocol's category 'Use of sold products'. For the specific case of EssilorLuxottica, only the usage of the equipment and instruments sold is considered (direct use-phase emissions). This category's emissions include the Scope 1 and Scope 2 emissions of end users and are computed by applying a specific calculation method for direct use-phase emissions from products that directly consume energy, based on the revenue recorded per geographic area. This category's emissions are based on actual data for 75%, while the residual part is calculated referring to the latest forecast figures.

Emissions Associated with End-of-Life Treatment of Sold Products

These emissions correspond to indirect emissions related to the waste disposal and treatment of products sold by the Company at the end of their life, representing the 3.12 GHG Protocol's category 'End-of-life treatment of sold products'. This category includes the total expected end-of-life emissions from all products sold in the reporting year. For the specific case of EssilorLuxottica, the biogenic emissions are not considered. The basic assumption is that the end-user disposes of the final product in general waste.

If the end-of-life treatment of the sold product is known, an emission factor sourced from Ecoinvent (v. 3.9.1) and corresponding to the type of treatment and the primary constituent material of the product is assigned. If the treatment is unknown, the product is assumed to be incinerated with or without energy recovery, or directed to landfill (considering an average emission factor for these three different treatments regarding general non-hazardous waste). In 2024, the percentage of emissions calculated with actual data amounts to 98%, while the residual part has been extrapolated based on available actual data.

Emissions Associated with Franchises

These emissions correspond to indirect emissions related to the operation of franchises not included in Scope 1 or Scope 2, representing the 3.12 GHG Protocol's category 'Franchises'. An average-data method is used, which involves estimating emissions for each franchise, based on the average Scopes 1 and 2 calculated for retail. This category's emissions do not include any extrapolation.

Emissions Associated with Investments

These emissions correspond to indirect emissions related to the Company's investments in the reporting year, not already included in Scope 1 or Scope 2, representing the 3.15 GHG Protocol's category 'Investments'. This category notably includes non-consolidated investments likely to contribute significantly to scope 3 emissions. The Group applies (i) the investment-specific method and (ii) the average data method to estimate Scope 1 and Scope 2 emissions associated with investments depending on relevance and reliability of the data available.

The Company continuously seeks to improve the calculation of its carbon footprint for all the different GHG categories. Some areas of improvements comprehend the gathering of further supplier-specific data and emission factors, while identifying detailed emission factors for single materials within the different clusters of purchased and managed items. Wherever actual information are not available, the Group will continue to look for updated information from external databased, statistics and surveys.

Methodology for EU Taxonomy Denominators

Annexes of the Delegated Act require calculating the proportion of Turnover, CapEx and OpEx associated with eligible and aligned activities. To accomplish this task, as stated in Section 2.5 *EU Taxonomy Disclosure*, the Group identified its eligible activities, assessed which were in line with alignment criteria and then calculated the three KPIs.

The next paragraphs present in detail what has been foreseen by provision of Annexes to the Commission Delegated Regulation (EU) 2178/2021 in terms of accounting items related to the KPIs that must be reported by non-financial undertakings in the sustainability report – as the approach retained by EssilorLuxottica.

Turnover

Turnover KPI as described by the regulation is to be calculated as the part of net turnover derived from products or services associated with eligible and/or aligned Taxonomy activities divided by the net turnover (denominator).

Numerator: The analysis was done in compliance with the six environmental objectives, namely: climate change mitigation, climate change adaptation, the use and protection of water and marine resources, transition to a circular economy, prevention and reduction of pollution, protection and restoration of biodiversity and ecosystems. As mentioned in Section 2.5 *EU Taxonomy Disclosure*, EssilorLuxottica's core economic activities are not described in the current version of the Taxonomy regulation and are not included in the Climate Delegated Act. Therefore, they are not considered as 'eligible' or 'aligned'. Consequently, for 2024 as for 2023, the Group did not generate any turnover eligible or aligned with the EU Taxonomy Regulation.

Denominator: Net turnover is defined as the amounts derived from the sale of products and provision of services after deducting sales rebates and value-added taxes directly linked to turnover. Following the description, KPI denominator corresponds to the line-item Revenue presented in the Chapter 5 of the 2024 Universal Registration Document, Section 5.1.1 *Consolidated Statement of Profit or Loss*.

Operating Expenses: OpEx

Denominator: For the calculation of the OpEx KPI denominator[1] the Group considered the share of costs falling into the categories mentioned by the Regulation: non-capitalized R&D, day-to-day servicing of assets, building renovation measures, short term leases, maintenance and repairs. For the calculation of the denominator, the following categories have been excluded[2]: i) overheads, ii) raw materials, iii) cost of employee operating the machine, iv) cost of managing R&D projects and v) electricity, fluids or reagents needed to operate property plants and equipment.

For all categories of the OpEx KPI, both external (outsourced activities) and internal (labor, materials and tools) costs were considered. Costs related to G&A (General & Administrative) have been excluded, including only expenses directly attributable to a specific asset.

Based on the analysis of data extracted from management and accounting tools, Group controllers were able to isolate the share of costs falling into the categories mentioned by the Regulation.

After analysis, OpEx represents less than 10% of the total Group consolidated operating expenses, and for this reason, and as for 2023, the Group considered the indicator as not material. Therefore, the numerator was not calculated.

Capital Expenditure: CapEx

Numerator: For each activity and each project identified as eligible, technical criteria were reviewed internally to ensure the alignment (see table in Section 2.5 *EU Taxonomy Disclosure*).

Denominator: For the calculation of the CapEx KPI denominator[3], the Group considered the increases of the period related to Property Plant and Equipment (PP&E), Intangible Assets (excluding goodwill) and Right of Use Assets (RoU), as presented in Chapter 5 of the 2024 Universal Registration Document, Section 5.1.6 (*Notes to the Consolidated Financial Statements*, Note 10 *Goodwill and Other Intangible Assets*, Note 11 Property, Plant and Equipment, and Note 12 *Leases*). As required by the Regulation, the values considered correspond to the line items Additions and Business combinations of the tables disclosed in Notes 10, 11 and 12, thus excluding the effects resulting from amortization, depreciation, impairment losses, divestment, assets classified as held for sale, translation differences and other.

As mentioned in the Section 1.1 *Basis for Preparation*, the new acquisitions were excluded from the current sustainability reporting, thus Turnover, CapEx and OpEx KPIs related to the new acquisitions during the 2024 were considered as not EU Taxonomy eligible due to inability to carry out a detailed analysis. Starting from 2025, the new acquisitions will be an integral part of the Group taxonomy eligibility and alignment analysis.

(1) *The proportion of OpEx shall be calculated as the numerator divided by the denominator associated with assets/processes associated with taxonomy aligned activities. The denominator shall cover direct non-capitalized costs that relate to: Research and development, building renovation measures, short-term lease, maintenance and repair, the day-to-day servicing of assets.*
(2) *FAQ Published by the EU Commission on EU Taxonomy on February 2, 2022.*
(3) *The proportion of CapEx shall cover: the additions to tangible and intangible assets during the financial year and the additions to tangible and intangible assets resulting from business combinations.*

6 Report on the Certification of Sustainability Information and Verification of the Disclosure Requirements Under Article 8 of Regulation (EU) 2020/852

This is a translation into English of the statutory auditors' report on the sustainability information and verification of the disclosure requirements under article 8 of regulation (eu) 2020/852 of the Company issued in French and it is provided solely for the convenience of English-speaking users.

This statutory auditors' report includes information required by European regulation and French law.

This report should be read in conjunction with, and construed in accordance with, French law and professional auditing standards applicable in France.

For the year ended December 31st, 2024

To the Annual Shareholders' Meeting of EssilorLuxottica,

This report is issued in our capacity as Statutory Auditor of EssilorLuxottica. It covers the sustainability information and the information required by Article 8 of Regulation (EU) 2020/852, relating to the year ended December 31st, 2024 included in the Group management report and set out in Section 6 *Sustainability Report* of the Universal Registration Document.

Pursuant to Article L. 233-28-4 of the French Commercial Code, EssilorLuxottica is required to include the above mentioned information in a separate section of its management report. This information enables to understand the impact of the activity of EssilorLuxottica on sustainability matters, as well as the way in which these matters influence the development of its business, performance and position. Sustainability matters include environmental, social and governance matters.

Pursuant to Article L. 821-54 of the aforementioned Code our responsibility is to carry out the procedures necessary to issue a conclusion, expressing limited assurance, on:

- compliance with the sustainability reporting standards adopted pursuant to Article 29 ter of Directive (EU) 2013/34 of the European Parliament and of the Council of 14 December 2022 (hereinafter ESRS for *European Sustainability Reporting Standards*) of the process implemented by EssilorLuxottica to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the Labour Code;
- compliance of the sustainability information included in Section 6 *Sustainability Report* with the requirements of article L. 233- 28-4 of the French Commercial Code, including the ESRS; and
- compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852.

This engagement is carried out in compliance with the ethical rules, including independence, and quality control rules prescribed by the French Commercial Code.

It is also governed by the H2A guidelines on 'Limited assurance engagement on the certification of sustainability information and verification of disclosures requirements set out in Article 8 of Regulation (EU) 2020/852'.

In the three separate parts of the report that follow, we present, for each of the parts of our engagement, the nature of the procedures that we carried out, the conclusions that we drew from these procedures and, in support of these conclusions, the elements that to which we paid particular attention and the procedures that we carried out with regard to these elements. We draw your attention to the fact that we do not express a conclusion on any of these elements taken in isolation and that the procedures described should be considered in the overall context of the formation of the conclusions issued in respect of each of the three parts of our engagement.

Finally, where deemed necessary to draw your attention to one or more disclosures of sustainability information provided by EssilorLuxottica in the Group management report, we have included an emphasis of matter paragraph hereafter.

The Limits of our Engagement

As the purpose of our engagement is to provide limited assurance, the nature (choice of techniques), extent (scope) and timing of the procedures are less than those required to obtain reasonable assurance.

Furthermore, this engagement does not provide guarantee regarding the viability or the quality of the management of EssilorLuxottica, in particular it does not provide an assessment, of the relevance of the choices made by EssilorLuxottica in terms of action plans, targets, policies, scenario analyses and transition plans, which would go beyond compliance with the ESRS reporting requirements.

It does, however, allow us to express conclusions regarding the entity's process for determining the sustainability information to be reported, the sustainability information itself, and the information reported pursuant to Article 8 of Regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such importance that they would be likely to influence the decisions that readers of the information subject to this engagement might make.

Our engagement does not provide assurance on any comparative data.

Compliance with the ESRS of the Process Implemented by EssilorLuxottica to Determine the Information Reported, and Compliance with the Requirement to Consult the Social and Economic Committee Provided for in the Sixth Paragraph of Article L. 2312-17 of the Labour Code

Nature of Procedures Carried Out

Our procedures consisted in verifying that:

- the process defined and implemented by EssilorLuxottica has enabled, in accordance with the ESRS, to identify and assess its impacts, risks and opportunities related to sustainability matters, and to identify the material impacts, risks and opportunities, that are disclosed in Sustainability report of the Group, and
- the information provided on this process also complies with the ESRS.

We also checked the compliance with the requirement to consult the social and economic committee.

Conclusion of the Procedures Carried Out

On the basis of the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the process implemented by EssilorLuxottica with the ESRS.

Concerning the consultation of the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the Labour Code, we confirm that the requirement has been fulfilled.

Emphasis of Matter

Without qualifying the conclusion expressed above, we draw your attention to the information provided in paragraph Boundaries of the sustainability report of Section 1.1.1 *General Basis for Preparation of Sustainability Statements* of the Group sustainability report which sets out the reasons for excluding the end-of-year acquisitions from the scope of double materiality analysis.

Elements that Received Particular Attention

We set out below the elements that have been the subject of particular attention on our part as regards the compliance with the ESRS of the process implemented by EssilorLuxottica to determine the information reported.

Concerning the identification of stakeholders

Information on the identification of stakeholders is set out in Section 1.3.2 *Interests and Views of Stakeholders* and 1.4.1.2 *Context analysis and identification of potential ESG topics* of the Sustainability report of the Group.

We obtained an understanding of the analysis conducted by the entity to identify:

- stakeholders, who can affect or be affected by the entities within the scope of the information, through their activities and direct or indirect business relationships across the value chain;
- the primary users of sustainability statements (including the primary users of the financial statements).

We interviewed management and/or the persons we deemed appropriate and inspected the available documentation. Our work consisted primarily in:

- assessing the relevance of the main stakeholders identified by the entity in view of the nature of its activities and its geographical location, taking into account its business relationships and value chain;
- exercising professional scepticism in assessing the representative nature of the stakeholders identified by the entity;
- assessing the appropriateness of the description given in Section 1.3.2 *Interests and Views of Stakeholders* of the Sustainability report of the Group, in particular with regard to the procedures put in place by the entity to collect information on the interests and views of stakeholders and the commitments made by the entity.

Concerning the identification of impacts, risks and opportunities ('IRO')

Information on the identification of impacts, risks and opportunities is provided in Section 1.4.1 *Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities – EssilorLuxottica Double Materiality Assessment* of the Sustainability report of the Group.

We gained an understanding of the process implemented by the entity to assess actual or potential impacts – both negative and positive – risks and opportunities (IRO), in relation to the sustainability matters mentioned in paragraph AR 16 of ESRS 1, 'Application requirements', and where applicable, those specific to the entity, as presented in Section 1.4.1.6 *Double materiality assessment outcome* of the Sustainability report of the Group.

In particular, we assessed the approach taken by the entity to determine its impacts and dependencies, which may be a source of risks or opportunities, including the dialogue engaged, where appropriate, with stakeholders.

We also assessed the completeness of the activities included in the scope used to identify IROs.

We familiarised ourselves with the entity's mapping of identified IROs as presented in Section 1.4.1.6 *Double materiality assessment outcome* including a description of their distribution within the entity's own operations and value chain, as well as their time horizon (short, medium or long term), and assessed the consistency of this mapping with our knowledge of the entity and, where applicable, with the risk analyses conducted by Group entities.

We carried out the following procedures:

- assessed the top-down approach used by the entity to collect information in respect of subsidiaries;
- assessed the entity has taken into account the list of sustainability matters set out in ESRS 1 (AR 16) in its analysis;
- assessed the consistency of actual and potential impacts, risks and opportunities identified by the entity with available industry analyses;
- assessed the consistency of the actual and potential impacts, risks and opportunities identified by the entity, in particular those specific to the entity since they are not covered or are insufficiently covered by the ESRS standards, with our knowledge of the entity;
- assessed how the entity has taken into account the different time horizons, particularly with regard to climate issues;
- assessed whether the entity has taken into account the risks and opportunities that may arise from both past and future events as a result of its own activities or business relationships, including the actions taken to manage certain impacts or risks;
- assessed whether the entity has taken into account its dependence on natural, human and/or social resources in identifying risks and opportunities.

Concerning the assessment of impact materiality and financial materiality

Information on the assessment of impact materiality and financial materiality is provided in Section 1.4.1.4 *Assessment and identification of material impacts, risks and opportunities* of the Sustainability report of the Group.

Through interviews with management and the examination of available documentation, we obtained an understanding of the process implemented by the entity to assess impact materiality and financial materiality, and assessed its compliance with the criteria defined in ESRS 1.

In particular, we assessed the way in which the entity established and applied the materiality criteria defined in ESRS 1, including those relating to the setting of thresholds, in order to determine the following material information disclosures:

- metrics relating to material IROs identified in accordance with the relevant ESRS standards;
- entity-specific disclosures.

Compliance of the Sustainability Information Included in Section 6 *Sustainability Report* of the Universal Registration Document with the Requirements of Article L. 233-28-4 of the French Commercial Code, Including the ESRS.

Nature of Procedures Carried Out

Our procedures consisted in verifying that, in accordance with legal and regulatory requirements, including the ESRS:

- the disclosures provided enable to understand the general basis for the preparation and governance of the sustainability information included in Section 6 of the Sustainability report of the Group, including the basis for determining the information relating to the value chain and the exemptions from disclosures used;
- the presentation of this information ensures its readability and understandability;
- the scope chosen by EssilorLuxottica for providing this information is appropriate; and
- on the basis of a selection, based on our analysis of the risks of non-compliance of the information provided and the expectations of users, this information does not contain any material errors, omissions or inconsistencies, i.e., that are likely to influence the judgement or decisions of users of this information.

Conclusion of the Procedures Carried Out

Based on the procedures we have carried out, we have not identified material errors, omissions or inconsistencies regarding the compliance of the sustainability information included in the Sustainability report of the Group with the requirements of Article L.233-28-4 of the French Commercial Code, including the ESRS.

Emphasis of Matter(s)

Without qualifying the conclusion expressed above, we draw your attention to the information provided 6.1.1.1 *General basis for preparation of sustainability statements* in the Sustainability report of the Group which sets out:

- the inherent uncertainties of the first year of ESRS implementation,
- the limitations related to the scope to collect the data, in particular concerning the acquisitions of Supreme and Heidelberg that occurred at the end of the fiscal year,
- the reasons for some indicators, notably those provided for by the ESRS E2 Pollution thematic standard, to not be or to be partially published.

Elements that Received Particular Attention

Information published in relation to greenhouse gas emissions, transition plan for climate change mitigation and metrics related to the company's waste generation as mentioned in Sections 2.1.8 *Total GHG Emissions (Scopes 1, 2 and 3)*, 2.1.3 *Transition Plan for Climate Change Mitigation* and in sub-section Waste of Section 2.4.6 *Targets and Metrics* of the Sustainability report of the Group.

We set out below the elements that have been the subject of particular attention on our part as regards the compliance of this information with the ESRS.

With regard to the information published on the greenhouse gas emissions assessment:

- we familiarised ourselves with the internal control and risk management procedures implemented by the entity to ensure the compliance of the reported information;
- we assessed the consistency of the scope considered for the greenhouse gas emissions assessment with the scope of the consolidated financial statements, upstream and downstream value chain;
- we familiarised ourselves with the greenhouse gas emissions inventory protocol used by the entity to draw up its greenhouse gas emissions assessment, and checked its application, for a selection of emissions categories and sites, for Scope 1 and Scope 2.
- with regard to Scope 3 emissions, we:
  - assessed the justification for the inclusion and exclusion of the various categories and the transparency of the disclosures provided in this respect,
  - assessed the process of gathering information,
  - reconciled the base data with accounting, when the underlying information was from accounting and financial systems;

- we assessed, with the help of our experts, the appropriateness of the emission factors used and the calculation of the related conversions, as well as the calculation and extrapolation assumptions, taking into account the uncertainty inherent in the state of scientific or economic knowledge and the quality of the external data;
- we met with management to understand the main changes in the entity's activities during the financial year that could have an impact on the greenhouse gas emissions assessment;
- for physical data (such as energy consumption), we reconciled, using sampling techniques, the underlying data used to draw up the greenhouse gas emissions assessment with supporting documents;
- we performed analytical procedures;
- with regard to the estimates that we considered to be critical, used by the entity to prepare its greenhouse gas emissions assessment:
  - through interviews with management, we obtained an understanding of the method used to calculate the estimated data and the information sources on which the estimates were based;
  - we assessed whether the methods were applied consistently or whether there were any changes since the previous period, and whether these changes were appropriate;
- we verified the accuracy of the calculations used to prepare this information.

With regard to our procedures regarding the Transition plan for climate change mitigation, our work mainly consisted of:

- assessing whether the information published in the transition plan meets ESRS E1 requirements with an appropriate description of the plan's underlying key assumptions, it being understood that we are not required to express a conclusion on the appropriateness or the level of ambition of the transition plan's objectives;
- assessing whether this transition plan reflects the commitments made by the entity as stated in the minutes of its governance bodies' meetings;
- assessing the consistency of the key information provided under the transition plan, including decarbonisation levers;
- assessing whether the transition plan is in line with the strategic plan as approved by the governing bodies and the entity's financial planning;
- verifying that the entity has carried out a qualitative assessment of locked-in GHG emissions and that it has taken this into account in its adaptation plan.

With regard to the information published on the Company's waste generation:

- we familiarised ourselves with the internal control and risk management procedures implemented by the entity to ensure the compliance of the reported information;
- we assessed the consistency of the scope considered for the Company's waste generation assessment of the calculation methods regarding waste related metrics as presented in the Methodology Note in Section 6.5 of the sustainability report with the scope of the consolidated financial statements;
- we familiarised ourselves with the Company's waste generation inventory protocol used by the entity ((hazardous, radioactive and non-hazardous), valorized and non-recycled for a selection of waste categories and sites.
- with regard to each category of waste:
  - we assessed the justification for the inclusion and exclusion of the various categories and the transparency of the disclosures provided in this respect,
  - we assessed the process of gathering information,
  - we reconciled the base data with accounting, when the underlying information was from accounting and financial systems;
- we met with management to understand the main changes in the entity's activities during the financial year that could have an impact on the Company's waste generation assessment;
- for physical data, we reconciled, using sampling techniques, the underlying data used to draw up the Company's waste generation assessment with supporting documents;
- we performed analytical procedures;
- with regard to the estimates that we considered to be critical, used by the entity to prepare its waste generation indicators:
  - through interviews with management, we obtained an understanding of the method used to calculate the estimated data and the information sources on which the estimates were based,
  - we assessed whether the methods were applied consistently or whether there were any changes since the previous period, and whether these changes were appropriate;
- we verified the accuracy of the calculations used to prepare this information.

Compliance with the Reporting Requirements Set Out in Article 8 of Regulation (EU) 2020/852

Nature of Procedures Carried Out

Our procedures consisted in verifying the process implemented by EssilorLuxottica to determine the eligible and aligned nature of the activities of the entities included in the consolidation.

They also involved verifying the information reported pursuant to Article 8 of Regulation (EU) 2020/852, which involves checking:

- the compliance with the rules applicable to the presentation of this information to ensure that it is readable and understandable;
- on the basis of a selection, the absence of material errors, omissions or inconsistencies in the information provided, i.e., information likely to influence the judgement or decisions of users of this information.

Conclusion of the Procedures Carried Out

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies relating to compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

Elements that Received Particular Attention

We have determined that there were no such elements to report.

Neuilly-sur-Seine, February 21, 2025

The Statutory Auditor
French original signed by

PricewaterhouseCoopers Audit

Stéphane Basset

Pierre-Olivier Etienne

See more. Be more.