EssilorLuxottica

MODERN SLAVERY STATEMENT 2021



INTRODUCTION

Modern slavery is a crime and a gross violation of fundamental human rights. EssilorLuxottica is committed to making continuous improvements to employment and workplace conditions including, but not limited to, the prevention of forced, bonded and trafficked labour. This is supported by the EssilorLuxottica group's policies and initiatives and is endorsed by a committed organisation and leadership. EssilorLuxottica does not tolerate forced labour within the business or its supply chain – and expects its supply chain (whether direct suppliers or those that supply its direct suppliers) to share the same values.

THE REPORTING ENTITIES

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) and is a joint statement that covers Luxottica South Pacific Holdings Pty Ltd (**LSPH**) and Luxottica Retail Australia Pty Ltd (**LRA**) (together, **Luxottica**) as reporting entities for the calendar year ending 31 December 2021. This statement sets out the actions Luxottica has taken to assess and address the risks of modern slavery in its supply chain and in its business.

This statement follows on from our parent company EssilorLuxottica S.A.'s commitments to ethics, governance and sustainability on a global scale, as outlined in our 2021 Universal Registration Document (including the Annual Financial Report) issued in French, filed on 25 March 2022 with the Autorité des Marchés Financiers (AMF). An English translation copy is available <u>here</u>.

As part of the EssilorLuxottica group of companies, of which EssilorLuxottica S.A. is the parent company, Luxottica remains committed to playing its part locally towards preventing and mitigating risks of modern slavery.



STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Structure

EssilorLuxottica S.A. is a French joint-stock company registered with the Trade and Companies Registry (Registre du Commerce et des Sociétés) of Créteil under number 712 049 618 (**EssilorLuxottica**). EssilorLuxottica is listed on the Euronext Paris market and is included in the Euro Stoxx 50 and CAC 40 indices.

In Australia, Luxottica operates under LSPH and LRA. LSPH has two wholly owned subsidiaries - LRA and Luxottica Retail New Zealand Ltd. LRA has two wholly owned subsidiaries - Luxottica Franchising Australia Pty Ltd and SGH Optics Malaysia Sdn Bhd.

LSPH is wholly owned by Essilor Luxottica S.p.A. which is wholly owned by EssilorLuxottica. LSPH and LRA are thus both ultimately wholly owned by EssilorLuxottica.

Global operations

EssilorLuxottica is a global leader in the design, manufacture and distribution of ophthalmic lenses, frames and sunglasses. EssilorLuxottica brings together the complementary expertise of two industry pioneers, one in advanced lens technology (Essilor) and the other in the craftsmanship of iconic eyewear (Luxottica), to create a vertically integrated business that is uniquely positioned to address the world's evolving vision needs. The merging of the two businesses is still occurring in many countries in which it operates including Australia where the Essilor entities are held and operated separately and as such, are not comtemplated in this statement. The innovation, design and quality of EssilorLuxottica's products and its strong, wellbalanced brand portfolio allow EssilorLuxottica to respond to the global demand of a growing industry. A vertically integrated business model also means that the entire value chain - design, product development, manufacturing, logistics and distribution for our core products - is conducted within EssilorLuxottica. This provides us with a high degree of control and visibility over our entire production process, including the management of risks associated with modern slavery.

EssilorLuxottica has a portfolio of more than 150 renowned brands spanning various categories from frames, lenses and instruments to bricks and mortar and digital distribution in the mid-range to premium segment. Proprietary eyewear brands include Ray-Ban, a loved eyewear brand across the world, Oakley, one of the leading sport performance brands globally, Persol, Oliver Peoples, Vogue Eyewear, Arnette, Alain Mikli, Costa, Bolon and Foster Grant. Licensed eyewear brands include Giorgio Armani, Bulgari, Burberry, Chanel, Coach, Dolce&Gabbana, Ferrari, Michael Kors, Miu Miu, Prada, Ralph Lauren, Starck Biotech Paris, Tiffany & Co., Tory Burch, Valentino and Versace for eyewear. The portfolio also includes a range of innovative lens technologies, including Varilux, Transitions, Crizal, Eyezen, Xperio and most recently Stellest.

Luxottica's Australian operations

In Australia, Luxottica trades through a number of brands, including OPSM, Sunglass Hut, Laubman & Pank, Ray-Ban and Oakley. As of 31 December 2021, Luxottica operates approximately 600 stores in Australia and employs just over 5000 employees. The vast majority of Luxottica's supply chain relies on the supply chain of EssilorLuxottica, as described below.

Supply chain

Globally, EssilorLuxottica and its partners operate 53 mass production facilities (of which 39 are lenses facilities and 14 are frames facilities) and 564 prescription laboratories and edge-mounting facilities.



EssilorLuxottica produced 100 million prescription frames and sunglass frames, 565 million prescription lenses and 66 million pairs of non-presciption sun lenses worldwide in 2021.

EssilorLuxottica oversees every aspect of its lens business, from production plant to prescription labs through to retail eyecare locations, with an ability to simultaneously manage flows both of stock lenses (finished lenses completed in the production plants) as well as custom prescription lenses (semifinished lenses produced in plants and sent to prescription laboratories for surfacing and coatings). See below:



There are approximately 3500 products available for sale to Australian consumers. The in-house product design, development and manufacturing of the eyewear products sold in Australia primarily occurs in 5 production facilities located in Italy, China and the United States. The majority of the product is produced in a plant in Danyang, China.

Luxottica sources 95% of the Australian product portfolio through the global supply chain which adopts a global and consistent approach to tackling modern slavery risks and changing demands, as discussed below. Luxottica sources the other 5% of its product portfolio from third party suppliers – generally large medical device companies that import goods into Australia and are sold in stores as items and accessories.

RISKS OF MODERN SLAVERY

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 which has strengthened over time. In some countries where EssilorLuxottica operates, the legislation relating to human rights and the environment may be limited or fall below international standards. Nevertheless, EssilorLuxottica strives to perform its activities in accordance with international standards for the protection of human rights and the environment, and implements standards designed to mitigate risk in these areas, and to remedy them where they arise.

EssilorLuxottica attaches particular importance to identifying risks and preventing serious breaches of human rights and fundamental freedoms, health and safety at work (referred to herein 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. EssilorLuxottica make every reasonable effort to implement necessary measures to address these risks.

Luxottica is aware that some third party suppliers in the supply chain operate from at-risk locations such as South East Asia and are deemed to be at higher risk of modern slavery for reasons such as social-economic vulnerabilities in the workforce and production. Luxottica also assigns higher risk to some industries known for less transparency and control such as labour-hire.

ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

Commitment to comply

EssilorLuxottica is built upon two centuries of innovation and human endeavor. EssilorLuxottica has placed particular importance on respect for human rights and the environment, along with applicable laws and regulations (*e.g.* the United Kingdom "Modern Slavery Act" and 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. EssilorLuxottica is committed to respecting and promoting human rights across its entire value chain.

EssilorLuxottica abides by the International Labor Organization (ILO) Conventions and the ten principles of the United Nations Global Compact relating to human rights, labour law, the environment and the fight against corruption. This commitment is deeply intertwined with EssilorLuxottica's Mission and was strengthened in recent years in the context of growth and expansion in new countries.

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. In all its businesses and across its supply chain, EssilorLuxottica is committed to ensuring that international standards and local employment laws are always adhered to and that undeclared work, child labor, forced work, and any other inappropriate employment conditions are prevented.

EssilorLuxottica is a member of the French association *Entreprises pour les Droits de l'Homme – EDH* (Companies for Human Rights), which aims to help international companies promote and improve the integration of human rights into business practices, and the BSR (Business for Social Responsibility), an international network which shares best practices and facilitates dialogue with stakeholders. EssilorLuxottica also supports RHSF (*Ressources Humaines Sans Frontières*) whose mission is to promote decent working conditions, and act against forced labour and child labour.

Corporate Social Responsibility strategy

EssilorLuxottica leads by example and considers the impact of activities through dialogue with stakeholders and the creation of shared values with its partners, suppliers, governments and local communities. EssilorLuxottica's Code of Ethics (discussed below) is the foundation of all its business, maintaining a vigilance and proactivity across responsible supplier sustainability, human rights and business ethics.

All EssilorLuxottica employees, contractors, vendors and suppliers, are expected to abide by the EssilorLuxottica Code of Ethics which includes obligations on respecting human rights, not accepting child labour, forced labour or human trafficking of any kind in our business and supply chains. Employees are also expected to promptly report any concerns.

Taking an important step toward a more sustainable future, in 2021 EssilorLuxottica introduced its Corporate Social Responsibility program titled *Eyes on the Planet*, which focuses on sustainability with commitments toward carbon neutrality, circularity, world sight, inclusion and ethics. Modern Slavery is a key part of our



commitment to ethics – with a focus on human rights issues and working conditions in our global supply chain even prior to Australia's introduction of a modern slavery reporting regime.

Supplier sustainability

EssilorLuxottica have a Responsible Sourcing and Manufacturing program that includes the following:

- suppliers acknowledge and respect the EssilorLuxottica Code of Ethics, specific supplier charter, and legal compliance on topics such as human rights and labour standards, environment, health and safety;
- supplier's are assessed for their environmental and social performance;
- buyers and suppliers are trained on sustainability principles and practices.

EssilorLuxottica's Sourcing and Procurement department are responsible for embedding, implementating and monitoring this program. Given its inter-departmental nature, the program brings together representatives of the Sourcing, Internal Audit, Manufacturing, Quality, Corporate Social Responsibility (**CSR**), Risk Management, Asset Protection and Compliance departments in a Steering Committee, which periodically evaluates the status of the program and future action plans.

Due diligence

EssilorLuxottica's risk assessment process, incorporating a CSR risk assessment, addresses human rights and fundamental freedoms, individual health, safety and security and the environment. EssilorLuxottica assesses its risk exposure either via specific risk mapping in relation to human rights or directly via specific programs that apply to both manufacturing sites and suppliers globally.

Risk mapping has helped to raise awareness among operational teams and to prioritize action plans at both the corporate and regional level. Regarding Tier 1 suppliers and subcontractors, EssilorLuxottica relies on the standards and programs described below:

- A dedicated team of experts (Compliance, Quality, Responsible Sourcing) supports risk assessment and due diligence of suppliers.
- qualified third-parties (e.g. Intertek, BSCI, SGS) audit suppliers' compliance with EssilorLuxottica's ethical working principles as well as environmental and social responsibilities. In this respect, two methods are being used.
 - The first method, mainly applied to EssilorLuxottica's eyecare activities, is to assess supplier performance through a shared self-assessment platform run by EcoVadis. Since 2020, in order to reinforce supplier selection, the company has been accepting alternative assessments done by other recognized third-party auditors (e.g. Intertek, BSCI, SGS). Based on the results of the supplier's self-assessment, EssilorLuxottica scores suppliers based on four different categories: opportunity, engaged, medium risk (30-44) and high risk (<30). For suppliers with low and unsatisfactory performance (<30), or for strategic suppliers refusing EcoVadis or any alternative assessment, third- party on-site audits are conducted, followed by a request to implement a progress plan and annual assessments to counteract the risk. To do so, suppliers may call on EssilorLuxottica's purchasing managers who are trained to support them in their improvement processes. Once remedial actions have been implemented, suppliers must undergo a new assessment. In the event that a non-compliant supplier does not wish to implement remedial actions or commit to make progress, EssilorLuxottica may have to terminate its business relationship with that supplier. During the year, EssilorLuxottica conducted 165 assessments in total.</p>
 - The second method, mainly applied to EssilorLuxottica's eyewear activities and apparel footwear and accessories (AFA) category, is to perform on-site supplier audits directly with the collaboration of Sourcing, Risk Management, Asset Protection and Compliance functions and supported by third-party auditors (*e.g.* Intertek, BSCI) in charge of monitoring



suppliers' compliance with the company's standards and principles as well as to implement corrective actions in the event of non-compliance with the company's Code of Ethics and/or local regulations, specifically targeting suppliers of direct materials and finished products and, more recently, also indirect suppliers. This approach is aimed at preventing the risk of serious cases of non-compliance with sensitive topics, including child labour, use of forced labour and corruption, when selecting and monitoring suppliers. This method requires immediate action from the supplier to comply with the rule and to phase them out in the event of non-compliance. EssilorLuxottica, requests suppliers to close all issues raised during the audit by an agreed deadline, giving priority to zero tolerance and non-compliances with local laws, international frameworks (e.g. ILO Conventions) and minimum recognized management practices (e.g. ISO standards). Suppliers showing no improvement and repeated issues across multiple audits are considered for phase out.

As detailed below, 52 current and potential eyewear suppliers were subject to audits in 2021 and major instances of non-compliance were identified for 6 suppliers. The split of audits has been the following:

- 2 follow-up audits due to unsatisfactory results of an audit from the previous year;
- 7 preventive audits, in order to qualify new suppliers or to establish a number of alternative suppliers in the event of particularly critical situations;
- 43 maintenance audits, in order to continue to qualify as a supplier.

The audit process on AFA suppliers continued in 2021, with 41 audits on production plants of suppliers located in Asia-Pacific, Latin America and Europe. Only two instances of non-compliance were identified.

Australian procurement

With respect to Luxottica's locally sourced services and products from third party suppliers in the 2021 reporting period, a modern slavery survey was issued to Luxottica suppliers identified as having the highest inherent modern slavery risk either because of their geographical location or the labour related nature of the services provided. The modern slavery survey pertained to the suppliers' compliance with modern slavery related laws. As part of our commitment to the ongoing review of our supply chains, any suppliers identified as presenting a modern slavery risk are required to undergo further assessments and ongoing monitoring, proportionate to their level of risk.

Luxottica engaged 1410 suppliers in Australia in the 2021 reporting period and contacted each of them to remind them of their modern slavery obligations. Most of these suppliers are considered "indirect procurement" meaning that the goods and services are not related to the sourcing of goods sold by Luxottica but contribute to business operations more generally. This includes, but is not limited to, logistics, office supplies, marketing services and employment consultancy. In 2021, Luxottica engaged each supplier by sharing a copy of our Modern Slavery Policy and our Code of Ethics and reminding suppliers of their obligations to mitigate the risk of modern slavery in their supply chain.

Luxottica dedicated attention to 280 suppliers that it considered to be of a higher risk due to their location and/or the sector or industry they operare in. 96 of those suppliers identified were disregarded due to a \$0 spend in 2021. Of the remaining 184, Luxottica focused on 70 suppliers perceived to be of the highest risk in the supply chain. Of those suppliers, 8 exhibited what it determined to be red flags and reason for further engagement and remediation. This included the supplier presenting one of more of the following behaviours: not providing adequate information, lacking policy or processes in relation to employee treatment, complaints and whistleblowing procedures, limited or no policy incorporating provisions of modern slavery, limited or no formal processes for raising modern slavery grievances or lack of oversight over supply chain. The further engagement at this time included requesting further clarification and details relating to red flags. Additional engagement with these suppliers will continue throughout 2022.



Onboarding

In conjunction with the supplier assessment initiatives, risk prevention and mitigation mechanisms have been instrumental to guarantee the respect of EssilorLuxottica's principles and standards along its value chain. Purchasing teams from EssilorLuxottica follow strict exclusion tools to ensure high risk or noncompliant suppliers are ruled out from the sourcing and procurement process.

EssilorLuxottica strengthened its mitigation mechanisms with the implementation of an "Exclusion Procedure" / "Zero tolerance" principle. This procedure applies to suppliers who do not meet the company's requirements after an on-site social and environmental audit and who refuse to implement the necessary corrective actions. This mechanism is in place to guarantee appropriate monitoring of high-risk suppliers and situations where non-conformity is systemic and more than occasional.

Engagement & training

To support and strengthen supplier sustainability programs and ensure alignment with EssilorLuxottica's standards, EssilorLuxottica have in place training and awareness initiatives targeting suppliers and the purchasing community. For instance, there is an Anti-Bribery & Corruption compliance program regarding ethical business conduct and compliance.

In 2021, online training tools launched for both professional buyers and suppliers have been made available on the Leonardo learning platform. Moving forward, EssilorLuxottica will continue building up its global program to further align and strengthen the organization and management of supplier sustainability.

Furthermore, in order to reduce its environmental risks and impacts and to have a process framework which promotes regulatory compliance and meets stakeholder expectations, EssilorLuxottica applies environmental best practices that meet ISO 14001 certification and facilitates management of the related impacts.

EssilorLuxottica's commitment to human rights and fundamental freedoms, health, safety and to the environment is supported at the highest levels of EssilorLuxottica, by its Board of Directors. In particular, the CSR Committee is regularly updated on specific topics including CSR risk assessment and management of sustainability issues. The CSR Committee also coordinates its work with the Audit and Risk Committee for all matters related to the CSR Committee's areas of intervention.

Operationally, the CSR department of EssilorLuxottica coordinates the deployment of the "Eyes on The Planet" program and oversees cross-functional issues including human rights. This is intended to support the operational functions (mainly HR, EHS, Risk Management, Compliance and Purchasing) at a regional or local level in applying the Company's policies and implementing reasonable vigilance measures.

The global Environment, Health and Safety department of EssilorLuxottica is responsible for the deployment of the environmental management systems aimed at reducing each company's environmental impact and ensuring the health and safety of all employees. This department relies on a network of correspondents present locally on production and distribution sites to oversee the operation of environment, health and safety management.

All Australian employees of Luxottica receive a copy of the Code of Ethics when they begin working with Luxottica. Employment contracts also refer to the employees' obligations to uphold the Code of Ethics. There is training available for employees on the topics of ethics, professionalism. Employees in Australia have access to the whistleblower program and are encouraged to speak up in situations of wrongdoing or unsafe practice.



Furthermore, regular awareness-raising and training initiatives delivered to employees on human rights and compliance- related topics ("Business and Human Rights", Code of Ethics, GDPR, health and safety policies etc.) are organized via dedicated e-learning modules and face-to-face training (many have been conducted digitally due to Covid-19). For example, more than 2,000 employees globally at EssilorLuxottica have followed e- learning modules on "Business and Human Rights". Many training courses were also delivered on key aspects of environmental management.

Internal audit

In addition, EssilorLuxottica created a dedicated "Human Rights" Audit Program to review risks relating to human rights, fundamental freedoms, health and safety at work and the environment, which could be generated either by the company's business or by its suppliers and subcontractors. In 2021, 20 entities were audited covering around 12.5% of EssilorLuxottica's Global headcount (excluding GrandVision). Results and key findings of these audits are shared with function leaders and contribute to adapting Group and local roadmaps. In 2022, EssilorLuxottica will continue to carry out audits on human rights topics across its entities which have been identified as most at risk and so as to include the largest number of Company employees.

Regular assessment

Risk assessments are regularly conducted in accordance with monitoring carried out by third parties that specialise in human rights, internal audit reports, and/or audits conducted with Tier 1 suppliers and subcontractors. Risk maps are updated as the group embarks on new activities, plants are set up in new countries or there is a change to suppliers or their subcontractors. Furthermore, all subsidiaries directly or indirectly controlled by EssilorLuxottica are required to report annually on key indicators related to human rights, the environment, and associated risks are monitored.

Alert mechanisms

EssilorLuxottica ensures that all employees are given the means to be heard when they have a question or concern about ethics, compliance, human rights, and the environment. Various channels are made available to employees who witness or fall victim to a breach of policy or unethical conduct. Employees can raise an alert though their direct manager, HR or the compliance department, their country or regional or business manager in order to escalate the issue. Employees can also use EssilorLuxottica's whistleblowing systems to report concerns about human rights and the environment.

ACTIONS TO ASSESS EFFECTIVENESS

EssilorLuxottica is committed to making continuous progress and is aware that its human rights and environmental approach requires monitoring, review and regular improvement to ensure that it continues to identify risks, that it updates its policies and internal procedures and makes appropriate commitments to take action to mitigate risk in its value chain (such as Essilor's Human Rights policy, Luxottica's Responsible Sourcing & Manufacturing program). In this way, EssilorLuxottica can further prevent serious breaches and take corrective action where applicable.

In addition to the assessment and monitoring mechanisms (audits, reports, participation in regional and local committees, etc.) outlined above, EssilorLuxottica has developed a set of performance indicators related to human rights and the environment, inspired by those of the Global Reporting Initiative (GRI), which are published each year in the Universal Registration Document. By monitoring these indicators, EssilorLuxottica evaluates the effectiveness of the initiatives implemented to prevent related risks. Below is a summary of key indicators:



Theme	KPI	2021 (ex. GV)	2020
Challenges relating to human rights and fundamental freedoms	Number of employees and agency workers below age 16	0	5
	Cumulative number of employees having completed "Code of Ethics" trainings at Essilorluxottica ⁽¹⁾	10,479	6,027
	Cumulative number of Essilorluxottica employees having completed "Business and Human Rights" training ⁽²⁾	2,401	1,696
	Percentage of eyecare strategic suppliers having completed CSR assessment	94%	100%
	Percentage of eyecare preferred suppliers which acknowledge the Supplier Charter	91%	100%
	Percentage of eyewear spending covered by LRSM program	93%	93%
	Of which: percentage of eyewear spending covered by on-site audits	81%	83%
	Of which: percentage of eyewear spending covered by training and/or awareness initiatives	50%	50%
	Percentage of AFA spending covered by on-site audits	62%	65%
Environmental challenges	Number of chemical spills	2	1
Challenges relating to the health and safety of individuals	Number of work-related fatalities - employees and agency workers	0	0
	Frequency rate of work-related injuries with absence - employees and agency workers	1.7	1.5
	Severity rate of work-related injuries with absence - employees and agency workers	0.06	0.05
	Total recordable incident rate - employees and agency workers	2.9	3.1

CONSULTATION

Entities owned and controlled by LSPH and LRA have been consulted in and approved this statement. This included discussion with subsidiaries in relation to the details of the Modern Slavery Act's reporting requirements, actions taken and relevant materials and updates.

RESPONSE TO COVID-19

COVID-19 placed huge disruption to our businesses and supply chain. As a retail business, there was a huge amount of resource dedicated to crisis response and operational changes that were the result of COVID-19 closures. This included store closures, employee wellbeing and isolation restrictions, supply shortages and logistics delays.

2020 COMMITMENTS

Luxottica made commitments in 2020 in its Modern Slavery Statement and can report the following progress:

- One of the commitments in our 2020 modern slavery statement was to integrate a risk identification and assessment step into our procurement selection process enabling the assessment of a prospective supplier's modern slavery risk profile. In 2021, Luxottica implemented a risk identification and assessment step for all existing suppliers and are still in the process of implementing the automated process for new suppliers. It is expected this implementation will be completed by the end of 2022.
- 70 suppliers with the highest risk profile were identified and targeted for additional engagement throughout the 2021 reporting year. This resulted in Luxottica being able to confirm that 62 of those targeted suppliers did not have any identifiable red flags within their supply chains. Of the remaining 8 suppliers with identified red flags, all were assessed, and additional discussion was entered into where required.
- Luxottica took appropriate action to act on red flags depending on the circumstances, including, for



example, working suppliers to develop an improvement or corrective action plan to mitigate the risk of modern slavery. This process is being formalised in training and the development of an internal checklist for stakeholders within the business to ensure a consistent and uniform approach to identifying and resolving red flags.

- Modern slavery provisions were incorporated into our standard contractual agreements with new suppliers, and in any supply contracts that come up for renewal. Commonly used templates have been updated with modern slavery compliance provisions.
- Luxottica conducted training for the business heads with a direct relationship with suppliers to raise awareness of modern slavery risks and of situations that may lead to a modern slavery risk.
- Email reminders were sent to approximately 1400 suppliers in relation to their obligations under the Luxottica Australian Modern Slavery Policy.

NEXT STEPS

Luxottica is committed to making further progress in the 2022 calendar year. Our ambitions include:

- completion of implementation of automated risk assessment process;
- further build up of online training program;
- additional engagement on red flags;
- develop new and upgrade existing supplier engagement methods;
- all scheduled audits completed;
- a revised Australian Modern Slavery Policy issued to and acknowledged by Australian-based suppliers and internal supply chain members;
- training and templates for Australian-based employees involved in procurement of suppliers; and
- regular board reporting on identified risks of modern slavery and ethical compliance.

APPROVAL

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth). This statement was approved by the Board of Directors of Luxottica South Pacific Holdings Pty Ltd on 27 June 2022. This statement was approved by the Board of Directors of Luxottica Retail Australia Pty Ltd on 27 June 2022.

Signed:

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Matteo Accornero Director, Luxottica South Pacific Holdings Pty Ltd Director, Luxottica Retail Australia Pty Ltd 27 June 2022

