

SOCIAL MEDIA POLICY

This policy applies to all Associates who communicate online on their own behalf, both during work and non-work time, and both in and out of the workplace. It also applies to Associates whose core work responsibilities include online communications or are otherwise participating at the request of the Company. Note: Retail brands may have additional guidelines specific to their online media strategies.

The Company recognizes that online communications, including participation in social media, may be a part of some Associates' everyday lives. The Company supports responsible online communication that complies with the following guidelines and best practices. Ultimately, Associates are solely responsible for what they post online. Before creating online content, Associates should consider some of the risks and rewards that are involved. Keep in mind that any conduct that adversely affects an Associate's job performance, the performance of fellow Associates or otherwise adversely affects customers, suppliers, people who work on behalf of the Company or the Company's legitimate business interests may result in disciplinary action up to and including termination.

Disclose Your Connection to the Company

Whenever discussing the Company, or Company products or services online, Associates must disclose their employment with Luxottica. Associates may not represent themselves as spokespersons for the Company, and must note that any opinions expressed are their own and do not represent the official position of the Company. An Associate's employment connection must be disclosed regardless of the space limitations of the medium used.

Do Not Disclose Any Confidential Company Information

Disclosure of any Company confidential, proprietary, or trade secret information is strictly prohibited. Any Company information that is subject to a Confidentiality Agreement or Non-Disclosure Agreement cannot appear in Associates' online posts under any circumstances. This includes but is not limited to: strategies and plans; sales and financial results; product releases, marketing or promotions; new store designs; inventory/pricing information; and customer information. Associates should not make comments about the Company that are maliciously false or make disparaging remarks about competitors. If an Associate has any questions about whether information is confidential, he/she may contact his/her supervisor or manager, Associate Relations, or Corporate Communications before disclosing any such information, or err on the side of caution and not disclose the information.

Give Your Honest and Truthful Opinions

Associates should make sure they are always honest and accurate when posting information or news, and if a mistake is made, correct it quickly. Be open about any previous posts that have been altered. Remember that the Internet archives almost everything; therefore, even deleted

postings can be searched. Associates should never post any information and rumors they know to be false about the Company, fellow Associates, customers, suppliers, people working on behalf of the Company, or competitors.

Associates should always be fair and courteous to fellow Associates, customers, suppliers or people who work on behalf of the Company. Associates should keep in mind that they are more likely to resolve work-related complaints by speaking directly with other Associates or by utilizing the Company's Open Door Policy than by posting complaints to a social media outlet. Nevertheless, Associates who decide to post complaints or criticism should avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, disparaging to customers, Associates or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, color, gender, national origin, religion, age, disability, sexual orientation, citizenship, veteran or military status, pregnancy, genetic information, or any other status protected by laws, regulations, ordinances or Company policy.

All Company marketing/advertising material must be approved by the Legal Department in accordance with Company policy.

Respect Intellectual Property Rights

Show proper respect for the laws governing copyright, fair use of copyrighted material owned by others, trademarks and other intellectual property, including the Company's own copyrights, trademarks and brands. To minimize the risk of a copyright violation, you should provide references to the source(s) of information you use and accurately cite copyrighted works you identify in your online communications. Do not infringe on Company logos, brand names, taglines, slogans, or other trademarks. Sensitive and personally identifiable information (such as customer and vendor names, individual social security numbers, protected health information, etc.) should never be cited or referenced without approval in compliance with all Company policies, laws and regulations.

You Are Personally Liable For Your Actions Online

Associates are personally liable under federal, state and local law for their actions and omissions with respect to their online communications. The Company reserves the right to hold an Associate directly responsible for any claims that arise from an Associate's violation of the law, this policy, or the Company's rights. By communicating online, Associates agree to indemnify the Company, its parents, affiliates and subsidiaries from any liability that arises out of the foregoing.

We Reserve The Right To Ask You To Remove Content

The Company will, in its discretion, review your social networking activities. Please note that

this Policy applies even if your social networking is anonymous or under a pseudonym. If you do engage in such social networking, you should be aware that in appropriate circumstances the Company will take steps to determine your identity. The Company may request that Associates temporarily confine their social networking to matters unrelated to the Company if it determines this is necessary or advisable to ensure compliance with securities regulations or other laws. The Company also may request that Associates remove content that may violate the law or Company policies – for example, content about customers, coworkers, supervisors, the Company, vendors, or suppliers that is vulgar, obscene, threatening, intimidating, harassing, libelous, or discriminatory on the basis of race, color, gender, national origin, religion, age, disability, sexual orientation, citizenship, veteran or military status, pregnancy, genetic information, or any other status protected by laws, regulations, or ordinances.

Promotions, Giveaways or Contests

Online giveaways, sweepstakes and contests are subject to applicable laws, compliance with Company policies and all applicable rules and guidelines of social media sites. All Company promotions must be reviewed in advance by the Legal Department.

Using Company Systems for Personal Use

Per the Company's IT Acceptable Use Policy, Associates should not use Company systems (computers, servers, networks, etc.) for personal use, including to create, access non-business related information or websites. Associates should refrain from using social media while on work time or on equipment provided by the Company, unless it is work-related as authorized by your supervisor or manager. Do not use Company e-mail addresses to register on social networks, blogs or other online tools utilized by personal use. A complete catalog of IT Security Policies and Procedures is available on BLU room.

Limitations

Nothing in this Policy will be interpreted to limit or interfere with Associates' rights under Section 7 of the National Labor Relations Act. For example, this policy is not intended to prohibit Associates from discussing with others the terms and conditions of their employment.

Relationship to Online Communications Policy in Associate Guide

This policy replaces and supersedes the Online Communications Policy located in the Associate Guide.