

LUXOTTICA OF AMERICA

INFECTIOUS DISEASE PREPAREDNESS & RESPONSE RETAIL PLAN: COVID-19

Purpose:

A pandemic of infectious disease is a global disease outbreak. It differs from an outbreak or epidemic because it affects a wider geographical area, often worldwide; infects a greater number of people than an epidemic; is often caused by a new virus or a strain of virus that has not circulated among people for a long time.

Luxottica takes the wellbeing and safety of our employees and customers seriously and will make every effort to ensure all reasonable safety measures are taken to protect our employees and customers. This document provides guidance for employees and management teams to support a safe, clean working environment during a pandemic.

Information pertaining to pandemics is always evolving. It is likely that new strategies to limit exposure to infectious disease will develop as well. We will continue to work to help identify routes of exposure, controls, and means of communication to enhance our program during this time. Information related to disease transmission, trainings, hazard assessments, social distancing, sterilizing, personal protective equipment, and postings will be updated as the need arises and/or recommendations from sources become available.

The areas covered in this document include:

- **RESPONSIBLE PARTIES**
- **RISK EVALUATION**
- **MANAGING POSITIVE CASES AND DOCUMENTATION**
- **PREVENTATIVE MEASURES**
- **PERIODIC INSPECTIONS**
- **TRAINING & EDUCATION**

RESPONSIBLE PARTIES

In the event of a pandemic, Luxottica Corporate and Luxottica Environmental, Health, and Safety (EHS) will develop and provide instruction on the specific requirements to be implemented. Luxottica of America (LOA) may designate a task force to assist Brands in managing State and local regulations, tailoring instruction to be specific to North America regulations, and assist in implementing the required protocols. Each LOA Brand will be responsible for communicating the protocol to the field employees. Management is responsible for cascading information down to store level employees.

RISK EXPOSURE EVALUATION

OSHA has divided job tasks into four risk exposure levels, as shown below.



The four exposure risk levels represent probable distribution of risk.

High Exposure Risk

High exposure risk jobs include those with a high potential for exposure to known or suspected sources. Workers in this category include healthcare delivery, healthcare support, medical transport, and mortuary workers exposed to known or suspected patients or bodies of people known to have or suspected of having the virus at the time of death.

Medium Exposure Risk

Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected, but who are not known or suspected patients. Workers in this category include those who may have contact with the general public (e.g., schools, high-population-density work environments, some high-volume retail settings), including individuals returning from locations with widespread transmission.

Lower Exposure Risk (Caution)

Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected. Workers in this category have minimal occupational contact with the public and other coworkers.

Given the OSHA Risk Pyramid described above, Luxottica locations and employees would be considered either Medium or Low risk category for infection related to most infectious diseases.

Worker Exposures:

Worker exposures include activities or interaction by individuals at the workplace. Employees at Luxottica are not tasked with duties or activities that involve regular contact with individuals who might have an infectious disease. However, employees in Retail Positions (Stores) and Doctor's office positions do interact with the general public including a customer/visitor to a store and patients for wellness checks or other services.

Non-Work Exposures:

Non-Work Exposures may include activities or interaction by individuals outside of the workplace. We ask that employees follow guidelines for disease prevention as listed and communicated by the CDC or local/state government agencies including requests to "shelter in place", "maintain social distance", etc.

Worker Individual Risk Factors

As listed in CDC Guidelines, individuals below are listed as People Who Are at Higher Risk for Severe Illness:

- People 65 years and older
- People who live in a nursing home or long-term care facility
- People of all ages with underlying medical conditions, particularly if not well controlled, including:
 - People with chronic lung disease or moderate to severe asthma
 - People who have serious heart conditions
 - People who are immunocompromised
 - Many conditions can cause a person to be immunocompromised, including cancer treatment, smoking, bone marrow or organ transplantation, immune deficiencies, poorly controlled HIV or AIDS, and prolonged use of corticosteroids and other immune weakening medications
 - People with diabetes or people with severe obesity (body mass index [BMI] of 40 or higher)
 - People with chronic kidney disease undergoing dialysis
 - People with liver disease

Individuals who are in one or more of the Risk Factors above or are otherwise at high risk may work with Employee Accommodations to evaluate options.

MANAGING POSITIVE CASES:

Employees should monitor for infection on a daily basis and are required to review for symptoms prior to coming to work. Any employee exhibiting symptoms should not report to work and should report possible infection to Employee Relations following the outlined reporting protocol.

In addition, any employee who develops symptoms while at work should immediately leave work, and report possible infection to Employee Relations following the outlined reporting protocol. Employee Relations will follow the most current CDC-based decision tree to determine next steps.

If a person who is sick was present in the facility, closure or outside vendor cleaning and disinfection is not necessary if daily routine cleaning and disinfection has been completed. This includes everyday practices that businesses and communities normally use to maintain a healthy environment.

- If less than 48 hours since the person who is sick was present in the facility and daily cleaning and disinfection has not been conducted, the Operations team may opt to close the store until the end of the quarantine period or to clean the store using an outside contractor.

CLEANING:

Cleaning following a positive case should follow the current CDC recommendations for cleaning and disinfecting facilities.

All areas of the stores should be cleaned first, using soap and water or other cleaner. Non-porous items should then be disinfected using an EPA registered disinfectant, or a disinfectant with a DIN if in Canada. Areas to be cleaned include retail space, doctor's office, other common areas, employee breakroom, etc. Products should be used following all instructions provided by the manufacturer.

Surfaces to be cleaned and disinfected include but are not limited to the below.

HARD SURFACES

Hard surfaces include tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, sinks, etc.

High touch surfaces include: Door handles, countertops, keyboard/monitor/mouse
Clean first, and then disinfect all high touch surfaces.

ELECTRONICS

Electronics include tablets, touch screens, keyboards, remote controls, etc.

Clean and disinfect electronics using alcohol-based wipes or sprays containing at least 70% alcohol.

FLOORS

Vacuum carpeted floors using a vacuum equipped with a high-efficiency particulate air (HEPA) filter.
Mop clean and disinfect hard surface floors.

SEATING

Seating includes chairs, stools, benches, etc.
Clean and disinfect all hard / plastic seating.

PREVENTATIVE MEASURES

The following are the 10 basic process categories anticipated to limit infection at work or to our employees:

- Administrative Controls
- Engineering Controls
- Safety Training and Hazardous Assessment
- Safety Equipment
- Safe Work Practices
- Temperature Screenings

- Vendor management
- Cleaning and Disinfecting
- Incident Investigation
- Risk Assessments

The following are the efforts that Luxottica has identified to limit potential exposure to infectious disease. We will complete periodic reviews and updates of these processes as needed when self-assessments, employee suggestions, or when Federal/State/Local governments provide guidance or mandates.

Engineering Controls

- Adjustments to a store/building's HVAC system (replacing filters, cleaning of HVAC systems, increasing the airflow).
- Installing barriers to limit contact (i.e., shields at registers) as necessary.

Administrative Controls:

- Instructing employees who are sick or have symptoms not come to work.
- Social distancing where possible by various means, including:
 - Providing remote work options when practical for business operations or location closures (aka "work-from-home") and use of tele-conferencing.
 - Altering work schedules and shifts in terms of hours and/or day at the designated work location.
 - Calculating the number of employees in a store (based on square footage) and using this as guidance for the "allowed employee number" for each store. The "allowed employee number" will also be used to determine appropriate staff levels to maximize social distancing.
 - Assessing entrances and customer traffic zones to comply with safe distancing requirements.
- Discontinuing non-essential travel and limiting employee access to workplace based on CDC or other government guidelines.
- Providing training and education to elevate employee's awareness to limit/reduce exposure to infectious disease.
- Signage and instruction for guests will be posted in the store.

Safety Training & Hazardous Assessment

- Conducting a Job Hazard Assessment. This will be done to evaluate and eliminate or control exposures to hazards.
- Training employees on the hazard and how to best avoid and protect themselves from the hazard.

Safety Equipment

- Face masks (face coverings) are required to be worn by all employees and contractors when inside Luxottica stores, offices and facilities. Face masks will be provided to employees.
- Employees will be trained on proper use of face coverings.
- Disposable face masks will be discarded at the end of shift or when they are wet or soiled.

- Customers are recommended to wear face masks when entering a store. Where local, state, or other government jurisdiction requires face masks, Luxottica will observe such requirements.
- Gloves shall be provided for employees as needed for designated job duties and while cleaning.

Safe Work Practices

- Providing instruction to keep 6 feet/2 meters distance from other employees and individuals whenever possible.
- Posting of reminders (handwashing, social distancing, wearing mask) signs as needed.
- Regular hand washing with soap and water for at least 20 seconds should be done:
(Use hand sanitizer when hand washing with soap and water is not possible)
 - Before and after eating / before handling food.
 - After sneezing, coughing, or nose blowing.
 - After using the restroom.
 - After touching or cleaning surfaces that may be contaminated.
 - After using shared equipment and supplies like electronic equipment such as keyboards, mice and phones.
 - As part of face covering use.
- Handwashing and disinfecting material and supplies will be provided and located in each store and all employees shall have access to these materials.
- Markings and postings on the floor and walls will be placed as a reminder and guide to maintain 6 feet/2 meters distance from other employees, as needed.

Temperature Screenings

- Temperature and symptom screening checks shall occur prior to entering Luxottica locations. Guidance from the CDC shall be the basis of the screening and we will follow CDC and/or local government parameters and recommendations.
- Individuals that do not pass the wellness check are trained not to report to work and will not be allowed into the location.

Cleaning and Disinfecting

- As part of standard infection control practices, routine cleaning should be ongoing, and time should be allocated for individuals to routinely clean. Surfaces touched most frequently should be prioritized for routine cleaning because soiled and frequently touched surfaces can be reservoirs for germs and an exposure pathway for transmission to people through contact with these surfaces.
- EPA registered or a disinfectant with a DIN if in Canada; disinfecting agents shall be provided in all location and will be accessible to all employees and will be stocked. The containers will be marked with their chemical contents.
- Safety Data Sheets (SDS) shall be available for employees to review. Employees must be trained on the information contained in each SDS.
- Cleaning of high traffic areas such as countertops, breakrooms, areas of egress/ingress, restrooms shall be performed per a cleaning checklist at regular intervals. Some locations may be deep cleaned more frequently if the need arises.
- Shared equipment and high/frequent touch devices be disinfected according to assigned schedule (signature pads, handles to doors, etc.) with an EPA registered disinfectant.
- Hard surface products will be cleaned according to an assigned schedule.

Incident Investigation

- Investigate positive incidents to identify and isolate workplace issues and perform tracing to determine others who might have been exposed.
- Investigations will follow a decision tree based on CDC recommendations. The decision tree will be made available through HR Solutions.
- Where appropriate, notify the local health department of positive employees.
- When required, record work-related incidents on the OSHA log and make notifications to OSHA for hospitalizations and/or deaths meeting the reporting criteria.

Vendors

- Only a vendor essential to the operation of a location will be permitted into a location, i.e., plumbers, HVAC techs. Vendors permitted inside will be required to provide their own safety equipment (face coverings, gloves) and must prescreen for symptoms etc. per CDC guidelines prior to entering.

Periodic Inspections

Luxottica will require periodic inspections of site operations in order to ensure conformance to Luxottica program requirements. The minimum frequency of the required inspections will be based on severity of the issue.

Training & Communication

Employee training takes place through written and verbal communication and covers the following topics:

- Information on COVID-19, preventing spread and who is especially vulnerable
- Self-screening at home, including temperature checks and symptom screening using CDC guidelines
- Procedures in place to keep employees safe (screening, staggered shifts, capacity requirements, social distancing, etc.)
- The importance of not coming to work if employees exhibit any COVID-19 symptoms, or if they live with or have been in close contact with someone testing positive for COVID-19
- When to seek medical attention
- The importance of hand washing/hygiene
- The importance of physical distancing, both at work and off work time.
- Proper use of face masks
- Availability of cleaning / disinfecting supplies and expectations to clean their workstations, tools, equipment, etc.
- Proper use of gloves and how and when to take off and get a new pair
- COVID-19 Vaccine effectiveness & FAQ's

Anti-Retaliation

Luxottica will not retaliate against any employee that reports bona fide concerns or non-compliance with the plan. Please reference the Employee Handbook for full details on Luxottica's anti-retaliation program.