

EssilorLuxottica

Group Corporate Communications Policy

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I. Introduction

I.1 Policy Statement

As we advance in the construction of EssilorLuxottica, it is more important than ever that the Company is presented in an accurate and consistent way to all audiences and stakeholders, across all geographies. To achieve this, and to **preserve and enhance the global image and reputation of EssilorLuxottica** and its brands, this Group Corporate Communications Policy has been developed.

This document provides an overview of EssilorLuxottica's guiding principles for governing and coordinating the Company's external and internal communication flows. It also sets forth that the **Corporate Communications function is responsible for developing, authorizing, and distributing internal and external communications** on behalf of EssilorLuxottica.

I.2 Scope

All employees of EssilorLuxottica, Essilor, Luxottica and their subsidiaries, regardless of their managerial level, department or location – including senior managers, officers, directors, employees, trainees, part-time and fixed-term employees, casual and agency staff as well as volunteers – are expected to abide by the following principles in all communications, both internally and externally.

All employees are individually responsible for reading, understanding, and complying with this document, and for acting in full accordance with the following guidelines. Every line manager is responsible for making sure each team member has access to this Policy.

The following principles cover all forms of communication – verbal, written, electronic or print – and should be read in conjunction with the [EssilorLuxottica Code of Ethics](#).

Subject to local applicable laws, breach of this Policy may result in disciplinary action up to and including dismissal. Employees may be required to remove Internet postings which are deemed to constitute a breach of this Policy. Failure to comply with such a request may result in disciplinary action.

Subject to local applicable laws, EssilorLuxottica also reserves the right to monitor employees' activities on social media to ensure that rules are being complied with. Employees consent to such monitoring by their use of Company resources and systems.

In case of doubts, please contact the Corporate Communications team via the contact details at the end of this document.

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II. External Communications

[II.1 Handling Of Privileged And Price Sensitive Information](#)

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External communication at EssilorLuxottica is guided by the following principles:

Authorized spokespeople. Only authorized employees of EssilorLuxottica, Essilor, Luxottica and their subsidiaries may share information related to the organization, its business, and its proprietary and licensed brands in a public setting. Only employees having prior approval from their function head and Corporate Communications may engage with media, present in public events, or issue public statements on behalf of EssilorLuxottica.

Confidentiality. EssilorLuxottica-related documentation and information, unless and until it is in the public domain, must be treated as strictly confidential. Inside information may only be disseminated through duly authorized channels, such as Company press releases issued in accordance with this Policy. This principle also applies to:

- Non-public information from or related to employees, clients, shareholders, suppliers, or other third parties
- Information on EssilorLuxottica prospects, performance, and policies
- Sensitive contents and materials specifically designed for the internal audience, e.g., crisis management situations, internal organizational announcements, valuable trade secrets and other confidential information as well as intellectual property and any major projects referring to EssilorLuxottica business areas
- The handling of Public Relations assets of EssilorLuxottica's proprietary and licensed brands including draft press releases, product, and VIP/influencer contents.

Participating in speaking engagements. Only duly authorized employees of EssilorLuxottica, Essilor, Luxottica and their subsidiaries may engage with the media and present in public events about/on behalf of the Company, its business, and its brands (both proprietary and licensed). Without prejudice of local applicable laws, all other employees are formally prohibited from communicating or speaking about/on behalf of the Company.

Should employees be presented with the opportunity to take part in a speaking engagement:

- Function heads and the Corporate Communications team must evaluate and approve the communication opportunity, the strategic value for EssilorLuxottica, and the suitability of the speakers
- Contents must be reviewed and approved by Corporate Communications.

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These principles apply to all kinds of speaking engagements, i.e., panels, speeches, presentations, media interviews, or conferences organized by the Company or any outside party. They also apply to in-person and virtual public settings – including video conferences on Skype, Zoom, Google Meet and Microsoft Teams (or any digital tools), Instagram and Facebook live interviews.

Compliance. All employees of EssilorLuxottica, Essilor, Luxottica and their subsidiaries should – regardless of their managerial level, department, location – always behave as ambassadors of the Group and be committed to preserving and enhancing EssilorLuxottica’s reputation, image, and integrity. Communications should never be in breach of Policies or contractual obligations such as:

- Confidentiality obligations that may be applicable
- Anti-corruption, gift, and entertainment Policies – i.e., employees should not accept bribes or anything of value in exchange of providing information about the Company to journalists or media
- Data Privacy Policies – i.e., employees should never disclose personal information about a colleague online – or any other laws or ethical standards – i.e., employees should never use social media in a false or misleading way, such as by claiming to be someone other than themselves or by making misleading statements.

II.1 Handling Of Privileged Or Price Sensitive Information

EssilorLuxottica shares are traded on the Euronext Paris stock exchange and are included in the Euro Stoxx 50 and CAC 40 indices. As a listed Company, EssilorLuxottica as well as its employees and those of Essilor, Luxottica and any subsidiaries, whatever their nationality or the country they live in, are subject to the provisions of French and European securities laws relating to market abuse and insider trading and breaches.

This regulation is founded on the principles of transparency and equality between investors and shareholders so that any buyer and seller of financial instruments of a listed Company has access to the same information at the same time. Therefore, companies listed on Euronext Paris take on an obligation to make regular disclosures of strategic information to the market and must ensure that their employees do not use or disclose information that could influence the value of the Company’s shares.

Unauthorized disclosure of confidential information may be detrimental to EssilorLuxottica; hence (i) the **EssilorLuxottica Investor Relations function is responsible for the dissemination of Company information to financial analysts and institutions**, and (ii) the **EssilorLuxottica Corporate Communications function is responsible for the dissemination of Company information to media and other external stakeholders**. Only the Chairman, CEO, Deputy-CEO, CFO, and IR management are authorized to speak to the investment community about/on behalf of EssilorLuxottica.

In order to ensure that non-public information relating to EssilorLuxottica as well as its subsidiaries

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remains strictly confidential, the Investor Relations and Corporate Communications functions must:

- Limit the disclosure of confidential information to people who have a legitimate need to know this information in the course of their duties and in the exclusive interest of the Company
- Prevent any disclosure or sharing of confidential information to outside sources and media outlets. In particular, no employee other than authorized spokespeople may communicate privileged or price sensitive information of EssilorLuxottica to a third party. Moreover, privileged or price sensitive information may only be provided if such information has been previously or is simultaneously publicly disseminated. This will typically be a press release or conference call open to the public
- Make sure that all documents (e.g., memos, letters, internal materials, etc.) provided by either the Company or its subsidiaries, whatever their nature, are confidential and remain the exclusive property of EssilorLuxottica.

What is privileged or price sensitive information? It is non-public information regarding EssilorLuxottica, Essilor or Luxottica, including any other subsidiary, which, if disclosed, could have a considerable effect on the market price of EssilorLuxottica shares. In other words, information, of a specific nature and not yet public, that a reasonable investor would consider important in a decision to buy, sell, or hold EssilorLuxottica shares is considered privileged or price sensitive information. Some examples of information that could be price sensitive are:

- Entry into or withdrawal from a business sector (or significant product/service)
- Changes in the Company's executive team (such as Board changes, the appointment of new managers in key positions, etc.)
- Purchase or disposal of holdings, assets or parts of the Company
- Business performance (including any information on major pricing changes, financial results or forecasts) if it deviates from the guidance provided to the market
- Material mergers or other strategic partnerships
- Settlement, changes or conclusion of material agreements or contracts
- Settlement of proceedings related to intangible assets such as inventions, patents or licenses, legal disputes
- Transactions on owned shares
- Ratings applied by a rating agency to EssilorLuxottica or its stocks and any changes to such ratings.

The abovementioned examples do not provide an exhaustive list of price sensitive information. The evaluation of the existence of privileged information is the responsibility of the Chairman and the CEO. Questions about whether a disclosure may be deemed as price sensitive should be directed immediately to the IR and Corporate Communications teams via the contacts detailed at the end of this document.

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Internal handling and external disclosure of price sensitive information are defined and regulated at the Group level in the *Procedure for Management and Public Disclosure of Corporate Information* which is updated and amended from time to time and available on both the [Essilor](#) and [Luxottica](#) Intranets.

All EssilorLuxottica employees must follow this procedure as a matter of compliance with and furtherance of EssilorLuxottica's corporate reputation.

II.2 Media Relations

EssilorLuxottica is committed to managing its relations with media outlets in a pragmatic and open way. The organization will be responsive to legitimate interests of media. It will also be proactive in disseminating information about the Company, its brands (both proprietary and licensed), and products when it is considered to be in the best interests of the Company by corporate management. However **only the Corporate Communications function and duly authorized employees** of EssilorLuxottica, Essilor, Luxottica and their subsidiaries are granted authorization to engage with media, as misleading communication, inaccuracies, or failure to deliver high-quality and consistent information may be harmful to the Company's reputation.

It is therefore critical that all employees, regardless of their managerial level, department or location, abide by the following guidelines in order to maintain a constructive and beneficial relationship with media.

Should employees be presented with the opportunity to talk to a media representative on behalf of the organization, please:

- Function heads should be consulted in order to obtain prior authorization
- The Corporate Communications function [please refer to media relations contacts detailed at the end of this document] should be engaged with advance notice for its consideration in evaluating and approving:
 - The communication opportunity
 - The effective strategic value for the Company
 - The suitability of the speaker(s)

Should employees be subject to any direct media solicitation, this must be immediately addressed to the Corporate Communications function according to the following procedure:

Step 1	Ask the journalist if he/she has contacted Corporate Communications first. If he/she hasn't, please notify him/her that henceforth all contacts should be made through this team
Step 2	Gather information including the news outlet, the journalist's identity, the subject of the interview, his/her phone number, and deadline

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Step 3	Politely assure the journalist that the Corporate Communications team will respond in time to meet the deadline
Step 4	Follow up immediately by referring to the Corporate Communications team [refer to media relations contact].

This applies to formal requests for interviews as well as enquiries, and includes all media – TV and radio, newspapers, magazines, local and national media, and Internet sites.

Do not offer information, opinions, and forward-looking financial statements to media, either in a formal or informal conversation – during a cocktail, chatting in a group of people, etc. – either on or off the record, even if you know the answer. In order to ensure the quality and consistency of information disseminated to media sources, all media enquiries should be handled by Corporate Communications and authorized employees, no matter who the media representative is or how innocuous the request may seem.

Please, note that **press releases** and all other external materials and documents **under the EssilorLuxottica, Essilor and Luxottica brands are also under the responsibility of the Corporate Communications function** and should be approved by the Head of Corporate Communications prior to dissemination.

II.3 Participation In External Events

When speaking about the Company at a public event, precautions must be taken to be sure to convey the appropriate messages, as any public presentation or speech may be recorded and shared live by attendees on social networks for instance.

Should any employee of EssilorLuxottica, Essilor, Luxottica or their subsidiaries be presented with the opportunity to take part in a **public speaking opportunity on behalf of the Company, prior authorization** from function heads and the Corporate Communications team must be obtained. The Corporate Communications function should be engaged with reasonable notice prior to the event – and prior to the publication of event promotions, i.e., invitations, press releases, newsletters, or social media postings – in order to evaluate and approve:

- The communication opportunity
- The effective strategic value for the Company
- The suitability of the speaker(s)
- The content of the prepared material and/or speech:
 - Refer to the corporate presentation
 - Refer to the [corporate website](#) as a relevant information source
 - Always **speak with a positive tone of voice** about EssilorLuxottica

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- Do not share any **privileged** or **price sensitive information**
- The name used to designate the Company externally must be **EssilorLuxottica** and cannot be shortened (i.e., EL or Essilux)
- **Authorized videos** for external sharing are available on the institutional website. Please, use contents that already exist and are approved for external use, without altering, cutting, or editing them.
Should new assets on corporate topics be needed, please refer to the Corporate Communications team
- **Authorized images** are those integrated in the corporate presentation. Please, do not use unauthorized contents
- The external disclosure of corporate contents intended for internal use only – i.e., Intranet articles, leadership communications, videos and photos, e-mails, internal presentations, internal communication materials, etc. – is strictly forbidden.

After being authorized to take part in either a virtual or in-presence public event, please use your official **Job Title** correctly and pay particular attention to geographical area, department, and brand.

Last but not least, approval to take part in a public event does not grant approval to give interviews at the event. If you are approached by media representatives (e.g., blogger, editor, or journalist) to speak about any aspect of the EssilorLuxottica business – including Mission and Sustainability (CSR) – or your role within the organization, immediately direct those queries to the Corporate Communications function.

II.4 Use Of Social Media

[II.4.1 Your Account On Social Media](#)

[II.4.2 Your Account On LinkedIn](#)

EssilorLuxottica recognizes the vital importance of contributing to the ongoing conversation on social media, including professional social networks – i.e., LinkedIn – as well as wikis, forums, blogs, and microblogging platforms – i.e., Twitter. The Company encourages its employees to participate in the online conversation and is committed to ensuring that it is done in the most appropriate way.

The following guidelines have been developed to empower employees of EssilorLuxottica, Essilor, Luxottica and their subsidiaries in being part of the infinite and changing opportunities available through social networks, while protecting confidential business information and personal data as well as preventing reputational damage to themselves and the organization. In particular, this document will help employees make **appropriate choices about the use of social media for personal purposes** and understand the potential impact of their use in the context of their employment.

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All employees, regardless of their managerial level, department, or location, are requested to abide by the following principles in all social media activity:

Responsibility. Employees are encouraged to speak about the organization and share public news and information concerning the Company. However, only duly authorized and trained spokespeople may speak on behalf of EssilorLuxottica. During their personal and unofficial online activities, employees are expected to: make it clear that they are expressing their own personal views; use common sense and communicate professionally; refrain from engaging in conversations which might be deemed obscene, discriminatory, dishonest, harassing, or bullying; refrain from posting disparaging or defamatory statements about the Company or its representatives, its employees, clients, suppliers, vendors and other affiliates or stakeholders; avoid communications that might be misconstrued in a way that could damage the Company's business reputation, even indirectly.

Employees should also be aware that all contents posted on their social media accounts can potentially go viral or be screenshotted, reshared, reposted and remain in the digital landscape, no matter what their privacy settings may be.

Transparency. Employees should be open and honest about who they are and the role they play within the organization. Furthermore, they should always bear in mind that their social network profile becomes their digital self, and that any content shared and any picture/video posted could potentially become viral and leave a long-lasting digital footprint, for better or for worse. Employees are therefore personally responsible for their statements on social media. Credibility is a major steppingstone to building a personal and professional reputation.

Employees of EssilorLuxottica, Essilor, Luxottica and their subsidiaries taking part in an online conversation about the organization or about the Company's products and services or its stakeholders, must: identify themselves; speak in the first person; say who they are and who they work for; try to add value and create or share worthwhile contents; think about the impact their comments and posts may have before publishing them.

Information protection. EssilorLuxottica encourages employees to connect and share public news and contents on the organization but clearly expects them to think carefully whether the information they are looking to disclose is considered as confidential or privileged. Employees should exercise extreme care when publishing any kind of content about EssilorLuxottica, Essilor, Luxottica and their subsidiaries or their brands (both proprietary and licensed), colleagues, internal organization, etc. They must not share confidential or sensitive business information about the Company – i.e., business expansion plans, results that might have been gleaned from internal events, meetings or press releases before their disclosure, confidential plans about new products or technologies, trade secrets or know-how – with customers or partners. Confidential information about proprietary and licensed brands – i.e., new product launches, advertising campaigns or brand strategies – cannot be shared without the prior approval of the relevant Marketing and brand/product communication teams as well as the Corporate Communications function.

Articles and contents available on the Intranet are meant for internal purposes. Should employees find some particularly interesting contents they wish to share on their personal accounts, they should

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make sure these are already available on corporate external channels (e.g., EssilorLuxottica.com, Essilor.com, Luxottica.com, corporate social media, or brands' official channels).

Respect of copyright and applicable privacy laws. To avoid violating trademark, copyright or publicity rights, employees are requested not to post images or any other content without the prior approval of those who own or appear in the image or content. Should employees want to quote other stakeholders, they should be sure to credit them and, if appropriate, add a specific link. Employees are also personally responsible for complying with any terms of the social media platform they are using. As these terms may differ across platforms and can include detailed community standards, users are requested to become familiar with the terms and standards for each social media platform they may wish to use.

If you are uncertain what Company information is public and whether you may disclose the information, contact the Corporate Communications team via the contact details at the end of this document.

II.4.1 Your Account On Social Media

EssilorLuxottica encourages its employees to be active on social networks and appreciates spontaneous ambassadors of the Company. However, employees **are requested not to**:

- **Open accounts, pages, or (closed) groups** on behalf of the Company or its brands (both house and licensed). Should you need to communicate externally for a certain purpose, please contact the Corporate Communications team
- **Use EssilorLuxottica/brands logos or campaign images** for improper purpose – i.e., profile image of personal social media account. Should you notice any kind of inappropriate use of the Company logo or brand logos on social networks and websites from third parties, please immediately report this to the Corporate Communications team
- **Alter the name** of the organization. The name used to designate the Company externally must be EssilorLuxottica and cannot be shortened (i.e., Essilux or EL).

Failure to abide by the abovementioned guiding principles may have a serious impact on the image and reputation of EssilorLuxottica and its house and licensed brands.

II.4.2 Your Account On LinkedIn

EssilorLuxottica supports its employees' professional development and need for connection, and encourages them to be active on LinkedIn, the world's largest professional networking platform which allows users to develop professional contacts and share valuable contents in support of the positive employer brand message.

Employees with a LinkedIn account, are requested to:

- **Use their official job title correctly** and be very specific in terms of the business unit they

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work in (e.g., Ray-Ban Brand Manager at Luxottica, Controller at Essilor, Store Manager at Sunglass Hut, Head of Corporate Communication at EssilorLuxottica, etc.)

- Note that employees of EssilorLuxottica, Essilor, Luxottica and their subsidiaries are all part of the same Group and therefore they can **choose the employer they would like to associate with** (e.g., a Ray-Ban Brand Manager at Luxottica can associate the Luxottica or EssilorLuxottica Company page to his/her account, a Controller at Essilor can associate the Essilor or EssilorLuxottica Company page to his/her account, etc.).

By creating a single LinkedIn meeting point for employees from different parts of the world, the Company aims to uphold a true networking platform and encourage cross-functional dialogue.

All employees are encouraged to follow the upcoming EssilorLuxottica page and its affiliates on LinkedIn and actively participate by sharing its contents.

II.5 Domain Names

The following guidelines cover the framework for the domain names and URLs related to the EssilorLuxottica's online assets, and the process for domain name acquisition, management, and renewal. They ensure that the Company:

- Has a comprehensive picture of its portfolio to renew or retire domain names
- Supervises and controls internal conditions and process to register domain names for EssilorLuxottica and act accordingly to protect the brand.

Therefore, any request to register, renew or retire a domain which incorporates the Company name should be addressed to the Corporate Communications contact details set below.

This domain framework enables EssilorLuxottica to:

- Protect the Company from legal and reputational risks associated with lapsed domain names (or domain names owned by third parties)
- Prevent EssilorLuxottica's domains from being associated with unwanted sites
- Facilitate the management of the organization's domain names, which will inevitably reflect on the reputation of the Company
- Better enforce assets, making sure that the Company digital footprint is carefully managed exclusively by duly authorized individuals.

III. Internal Communications

EssilorLuxottica believes that clear and effective internal communication plays a crucial role in creating a successful and highly engaged organization.

To ensure quality and consistency, the Internal Communications team is responsible for developing, authorizing, validating and distributing all internal communications on behalf of the Company – i.e.,

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managerial and strategic communications on sensitive topics such as global/local organizational announcements, memos, internal events and campaigns, emailing, newsletters, Intranet stories. As such, **only Internal Communications and authorized employees are entitled to communicate internally on behalf of the organization.**

Should any team/function need to communicate internally to all employees or to a wider group of employees:

- An official request must be sent to the Internal Communications team with reasonable notice prior to targeted date of communications
- Contents and materials must be reviewed and approved by Internal Communications prior to distribution.

All requests should be submitted via the contact details below.

IV. Company Identity And Logo Usage

The following guiding principles will help identify which logo should be used vis-a-vis different types of events. Please note that all employees of EssilorLuxottica, Essilor, Luxottica and their subsidiaries as well as all entities and departments wishing to use the Company logo in any cases other than those mentioned below, should submit an official request to Corporate Communications via the contact details at the end of this document.

- **B2B events** – i.e., trade events, shows, fairs – should be considered as EssilorLuxottica global projects whenever both operating companies are represented. Nevertheless, should the organizers of any local event want to use the EssilorLuxottica brand, a request for authorization should be sent to the relevant Marketing Team & Services and the Corporate Communications team.
- For **B2C events**, all necessary information – i.e., background, objective, key activity and presence as EssilorLuxottica, Essilor or Luxottica – should be submitted to the Marketing Team & Services and the Corporate Communications team for prior validation. Corporate Communications will evaluate the request and provide guidance.
- For **internal purposes**, functions that have merged under EssilorLuxottica are entitled to use EssilorLuxottica branding for their internal communications. Each operating company not merged under EssilorLuxottica must keep using its current Essilor or Luxottica logo to brand internal events, newsletters and stationery or goody materials, with the exception of joint activations or events. In such cases, all necessary information – i.e., background, objectives, key activity and presence as EssilorLuxottica, Essilor or Luxottica – should be submitted to Corporate Communications for prior validation. Corporate Communications will evaluate the request and provide guidance.

Once formal authorization to use the EssilorLuxottica logo has been granted, please refer to the

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brand graphical chart to ensure global consistency. To obtain this document, contact the Corporate Communications team via the contact details below.

An official contact from Corporate Communications (either global or regional) must validate all types of local communications featuring the EssilorLuxottica logo to be used for both internal and external purposes – i.e., leaflets, brochures, save-the-dates, invitations, goodies and posters.

Email signature Please read the following signature guidelines closely:

- For employees who have already been **appointed to official EssilorLuxottica roles** or employees whose **responsibilities encompass Essilor and Luxottica businesses**, the signature template should include name and surname, job title, EssilorLuxottica logotype, address, phone number and website. Example:

First and last name
Job title

| *Arial Bold or Sans Serif Bold - 10 pts*
| *Arial Regular or Sans Serif Regular - 10 pts*

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| *Logotype, 40mm*

Street name, Number
ZIP Code City, Country
T +00 000 0000000
M +00 000 0000000
essilorluxottica.com

Please don't print this e-mail
unless you really need to.

| *Arial Regular or Sans Serif Regular - 7,5 or
7 pts*

- Employees who have not been appointed to official EssilorLuxottica roles, regardless of their business unit, role or geography, are warmly encouraged to highlight their place in the EssilorLuxottica community in one of the following ways:
 - For employees who have **Essilor or Luxottica corporate positions**, the signature template can include name and surname, job title (employees should be very specific in terms of the business unit they work in – e.g., HR Business Partner at Luxottica,

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Controller at Essilor), EssilorLuxottica logotype, address, phone number and website.
Example:

First and last name
Job title

| *Arial Bold or Sans Serif Bold - 10 pts*
| *Arial Regular or Sans Serif Regular - 10 pts*

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| *Logotype, 40mm*

Street name, Number
ZIP Code City, Country
T +00 000 0000000
M +00 000 0000000
essilorluxottica.com

Please don't print this e-mail
unless you really need to.

| *Arial Regular or Sans Serif Regular - 7,5 or
7 pts*

- For employees working for a **specific business entity/brand**, the signature template can include name and surname, job title, business entity/brand logotype followed by the sentence "part of EssilorLuxottica", address, phone number and website. Example:

First and last name
Job title

| *Arial Bold or Sans Serif Bold - 10 pts*
| *Arial Regular or Sans Serif Regular - 10 pts*

| *Business entity/brand Logotype - 40mm*

Part of EssilorLuxottica

| *Arial Bold or Sans Serif Bold - 7,5 or 7 pts*

Street name, Number
ZIP Code City, Country
T +00 000 0000000
M +00 000 0000000
essilorluxottica.com

Please don't print this e-mail
unless you really need to.

| *Arial Regular or Sans Serif Regular - 7,5 or
7 pts*

Employees working for a specific business entity/brand may also choose to keep their signature template as is.

The new email signature templates are available on the [Essilor](#) and [Luxottica](#) Intranets. In case of doubts, local HR Business Partners should be contacted.

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V. Contacts

For external & digital communications, media relations, brand & logo usage as well as domain-related inquiries, please contact	corporate.communications@essilorluxottica.com
For internal communications inquiries, please contact	internal.communications@essilorluxottica.com
For financial inquiries, please contact	ir@essilorluxottica.com