

Workplace Violence & Harassment Policy

(Addendum for Canada)

Luxottica will not tolerate workplace violence or workplace harassment, or the threat of violence or harassment.

Where the term "employee" is used in this Policy it means any part-time, full-time, casual or temporary employee of Luxottica as well as any individual who would be considered a "worker" for the purpose of the Occupational Health and Safety Act ("OHS").

This policy will be reviewed and updated regularly, no less than every 3 years or sooner if regulations are updated. This policy supports the EssiloLuxottica Employee Guide, which should also be referenced when looking for guidance on Workplace Policies.

Definitions

Under this Policy, the following terms shall have the following definitions:

- "Threat": The implication or expression of intent to inflict physical harm or actions that a reasonable person would interpret as a threat to physical safety.
- "Workplace": Wherever Luxottica business is conducted (whether or not on Luxottica property) and at any Luxottica event.
- "Workplace violence": The use, or attempted use, of physical force against an employee that could cause physical injury. Workplace violence also includes a statement or behaviour that an employee could reasonably interpret as a threat to use physical force against him or her that could cause physical injury.
- "Workplace harassment": A course of vexatious comments or conduct against an employee that is known or ought reasonably to be known to be unwelcome, including workplace sexual harassment.
 - Workplace harassment does not include a reasonable action taken by Luxottica relating to the supervision and direction of an employee or the workplace.
- "Workplace sexual harassment": Engaging in workplace harassment against an employee because of sex, sexual orientation, gender identity or gender expression and making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know the solicitation or advance is unwelcome.

Prohibited Behaviour

The following behaviour is prohibited in the workplace and will result in discipline up to and including termination of employment for cause ("Prohibited Behaviour"):

- Workplace violence or harassment, including workplace sexual harassment.
- Any threat or intimidation.
- Possession of a weapon of any kind on Luxottica property (including any parking lot or other exterior premise), while engaged in any activity for Luxottica in another location, or at a Luxottica sponsored event, unless such possession or use is a requirement of the job.
- Assault.
- Physical restraint or confinement.
- Dangerous or threatening horseplay.

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- Blatant or intentional disregard for the safety or well-being of another.
- Retaliation against anyone who has made a complaint or who has participated in an investigation under this Policy.
- Failure to report an incident of workplace violence, harassment or sexual harassment, of which an employee is aware.
- Any other act considered by Luxottica to be a violation of this Policy, whether or not specifically set out above.

Safety Measures

Luxottica will endeavor to ensure the safety of every employee. To this end, each employee is asked to take the following measures:

- Remove oneself from immediate danger.
- Contact emergency services where appropriate (i.e., police, ambulance).
- Follow all policies, practices and procedures regarding safety in the workplace.
- Let Management or colleagues know of one's whereabouts.
- Notify Management immediately of any suspicious persons in the workplace.
- Use the service of building security as needed.
- Immediately advise Management of any identified or potential safety risks in the workplace.
- Become familiar with the location of all building exits.
- Use common sense. Be alert to the surroundings.

Risk Assessment

A risk assessment has been conducted of the workplace and will be repeated as often as deemed necessary by the JHSC. The results of the assessment will be presented to the JHSC.

If any unreasonable risk is identified during the assessment, Luxottica and the JHSC will work together to determine and implement appropriate measures to address the identified risk.

Disclosure of Risk of Violent Behaviour

Luxottica will provide information to an employee if the employee is expected to encounter an individual with a history of violent behaviour of which Luxottica is aware and the individual poses a risk of workplace violence likely to result in physical injury. However, Luxottica will only disclose information reasonably necessary to protect an employee from violence.

Reporting and Investigation

Any employee who is subjected to, a witness of, or has knowledge of, any incident or threat of workplace violence or harassment, is required to immediately report the incident in writing to Management. This includes reporting any situation of domestic violence that would likely expose an employee to physical injury in the workplace and/or that may endanger an employee in the workplace.

If the alleged harasser is a member of Management or a supervisor, the employee can report an incident or threat of workplace harassment to Human Resources.

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This Policy does not preclude an employee from contacting the Police where he or she feels it is appropriate; nor is this Policy intended to discourage an employee from taking steps to contact emergency services as needed.

An incident or complaint of potential or actual workplace violence or harassment will be investigated promptly and impartially. Information obtained about an incident of workplace harassment, including identifying information about any individual involved, will not be disclosed unless necessary to investigate or take corrective action with respect to the incident or complaint, or as otherwise required by the law.

An incident or complaint will be investigated in a manner appropriate in the circumstances. This may include an internal investigation conducted by an investigator or investigation team as determined by members of Management, or the use of external resources. The investigator(s) may undertake some or all of the following procedures as deemed appropriate in the circumstances:

- Review the allegations.
- Conduct interview(s) of the complainant, potential witnesses, the subject of the complaint, or anyone with relevant information.
- Collect and review documents.
- Review the workplace or sites of the incident.

After conducting its investigation, the investigator(s) will make an objective assessment of whether there has been a violation of this Policy. The outcome of the investigation will be reported to the complainant and the individual who is the subject of the complaint or incident, provided they are each an employee. With a harassment complaint, the outcome of the investigation and any corrective action taken will be communicated in writing.

During the investigation or (depending on the outcome) after the investigation is complete Luxottica may reassign, or place on paid leave, either or both of the complainant(s) and individual(s) who is the subject of the complaint or incident.

An employee found to have engaged in Prohibited Behaviour will be subject to disciplinary action, up to and including termination of employment for cause.

Although Luxottica must normally provide the result of an OHS investigation to the JHSC, Luxottica is not required to provide the JHSC with the result of an investigation regarding an incident or complaint of workplace harassment.

Training and Education

The Company will provide information and training to every employee on this Policy, which shall include procedures for preventing, reporting and responding to incidents of workplace violence and harassment.

Training will be implemented through a combination of online modules and review of the Employee Handbook. Employees responsible for investigation of incidences will take additional training, as outlined in their department onboarding protocol. Unless Provincial law requires otherwise, retraining will take place every 2 years as a best practice.

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