

# Wireless Policy - EssilorLuxottica North America (ELNA)

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**Effective: November 1, 2022**

Applicability: EssilorLuxottica North America entities and affiliates

## 1.0 Purpose

The purpose of this policy is to define standards, procedures, and restrictions for the issuance and usage of ELNA owned and issued wireless devices and other related wireless hardware (hereinafter, "Company-issued wireless devices").

The goals of this policy are threefold:

- 1) To provide all users of Company-issued wireless devices with a clear understanding of the guidelines and procedures for using such devices.
- 2) To protect ELNA, its staff, and its financial resources from potential security and/or legal risks related to the use of Company-issued wireless devices.
- 3) To protect ELNA technology-based resources (such as corporate data, computer systems, networks, databases, etc.) from unauthorized use and/or malicious attack that could result in loss of information, damage to critical applications, loss of revenue, and damage to ELNA's public image.

## 2.0 Scope

This policy applies to any individual who uses Company-issued wireless devices while accessing the organization's data and networks via wireless means, including, but not limited to, all ELNA employees, contractors, and other agents (hereinafter "corporate subscriber"). Usage will be monitored by the appropriate Shared Services Departments.

## 2.1 Enforcement

The Company will provide corporate subscribers with wireless devices necessary for business operations, as determined by the Company, ONLY if such individuals are in compliance with the guidelines of this policy and the Mobile Devices Policy found in the ELNA Employee Guide.

Access to enterprise network resources is not a right. Consequently, employment at or a business relationship with ELNA does not guarantee the granting of these privileges. Corporate subscribers who do not comply with or abuse this policy, or the Mobile Devices Policy, may be subject to a delay or withholding of Company-issued wireless devices and/or disciplinary action up to and including termination of employment.

## 2.2. Contact Information Regarding NA Wireless Device Policy

Please contact Corporate Services ([corporate\\_services@luxotticaretail.com](mailto:corporate_services@luxotticaretail.com)) or Employee Services ([employeeservices@essilorusa.com](mailto:employeeservices@essilorusa.com)) with any questions, concerns, or suggestions regarding this policy.

### 3.0 Corporate Subscriber Eligibility

To determine eligibility, the requisite level approver (see chart below) should evaluate the corporate subscriber's current mobile usage on his/her personal mobile device, the need for additional mobility in relation to his/her job responsibilities, substantial travel requirements, and the additional expense of providing an individual with a Company-issued wireless device. Those factors should be weighed against the corporate subscriber's potential for increased productivity for the business.

Upon the requisite approval, corporate subscribers are eligible for one mobile wireless device (e.g., iPhone OR air card). Subscribers needing a mobile device and an external Wifi connection will have the MHS feature activated on their company phone. The Company will pay for any relevant equipment and monthly rate plan charges.

Luxottica Eligible Positions	Essilor Eligible Equivalent Level	Equipment *	Requisite Level Approver
VP (Level 23) and Above	Grade E13 & Above	Mobile Wireless Device or Air card / MIFI	None
Sr. Director /Field Manager (Level 22) and Below	Grade E12 and Below	Mobile Wireless Device or Air card / MIFI	SVP/EVP

*\*Note: Includes accompanying accessories, which may change at the Company's discretion.*

### 3.1 Obtaining a Company-issued Wireless Device

All requests for Company-issued wireless devices must be submitted via the Corporate Services Approval Form. To obtain this form, please refer to Exhibit 1. For additional help with the form, please contact [Corporate\\_Services@luxotticaretail.com](mailto:Corporate_Services@luxotticaretail.com) or [employeeservices@essilorusa.com](mailto:employeeservices@essilorusa.com). For French-speaking employees in Canada, please email: [gestioncellulaire@essilor.ca](mailto:gestioncellulaire@essilor.ca).

Once the necessary approval has been obtained, Corporate Services will coordinate with the relevant vendors/approved carriers to set up the appropriate accounts for the corporate subscriber, purchase the associated equipment (if there are no available items for use in ELNA inventory), and provide technical support in setting up the equipment. Please refer to Section 4.1 regarding the purchase of new equipment.

If an employee, contractor, or agent is not approved for a Company-issued wireless device, he or she should use the communication device(s) provided by the Company to conduct Company business.

### **3.2 New or Replacement Devices**

Corporate subscribers needing new or replacement devices must obtain the requisite level of approval. If an updated version of the relevant device is not available in inventory, please see Section 4.1 regarding the purchase of new equipment.

### **3.3 Status Changes/Terminations**

It is the responsibility of the requisite level approver to justify the business need for a Company-issued wireless device. In the event that a corporate subscriber is terminated, no longer has need for a company-issued wireless device, or loses the right to have such device, the requisite level approver must communicate this to Corporate Services, who will then be responsible for terminating the services.

In either event, it is the responsibility of the corporate subscriber's HR Business Partner (HRBP) or Direct Manager to retrieve the Company-issued wireless device(s), accessories, and the 6-digit passcode needed to unlock the device(s) and turn them over to Corporate Services, who will then be responsible for the closing of the relevant accounts. Any corporate subscriber who terminates his/her employment or business relationship with the Company or no longer has approved access to Company-issued wireless device(s) must surrender the device(s), including accessories, without exception. All wireless numbers connected to Company-issued wireless devices are strictly considered to be the property of ELNA. Corporate subscribers are not permitted to retain the wireless numbers upon termination of their employment or business relationship or approved access, unless approved in advance by the requisite level approver or the HRBP.

### **4.0 Equipment and Carrier Standards**

Once a device request has been approved by the requisite level approver, the Wireless Helpdesk will issue the current model supported by ELNA IT Department specifications. The monthly plan assigned will be the rate negotiated under the EssilorLuxottica NA corporate plan with the approved carrier.

### **4.1 Purchasing of Equipment**

***All equipment must be purchased through the company wireless store/website. Purchasing through other means will not be reimbursed.***

To request a device for a corporate subscriber (if there is none available in inventory), corporate subscribers must submit a formal request to Corporate Services via the Corporate Services Request Form. (see Exhibit 1).

Any additional equipment/accessory purchases will be the responsibility of the corporate subscriber and will not be reimbursable (i.e., phone case, extra charger or earbuds).

### **4.2 International Travel and Roaming**

When a corporate subscriber connects from abroad, WIFI calling should be used whenever available as international data roaming charges might not be covered by the assigned voice and data plans. It is the responsibility of the corporate subscriber to contact Corporate Services to notify them of the need for a global plan. Failure to do so could result in the subscriber's inability to use the device while traveling globally.

## 5.0 Device Tracking

Corporate Services maintains a log outlining what Company-issued wireless devices each corporate subscriber has in his/her possession.

### 5.1 Lost or Damaged Devices

The Company will provide corporate subscribers with ONE Company-issued wireless device per subscription. This includes replacing the device upon plan eligibility to upgrade the device. In the event a device is lost, stolen or damaged, the corporate subscriber must notify Corporate Services immediately. Abuse, misuse, and/or disregard for Company-issued wireless devices will not be tolerated and will be subject to disciplinary action up to and including termination of employment.

- Lost or damaged devices will be replaced utilizing devices in current inventory. Devices that cannot be replaced with current inventory, and are not eligible for upgrade, may not be replaced by the Company, at the Company's discretion.
- Unless prohibited by law, the cost of lost, stolen or damaged equipment may be the responsibility of the corporate subscriber and may not be eligible for reimbursement or replacement, at the Company's discretion.

## 6.0 Monitoring of Usage

Corporate subscribers are held responsible for the appropriate business usage of their Company-issued wireless devices and should never consume more data than the plan allows. Usage resulting in excessive monthly fees or restricted bandwidth access will not be tolerated. Examples include excessive data downloading, international roaming, etc. Please see Section 4.2 for information regarding international roaming.

If a corporate subscriber consistently exceeds the maximum data usage permissible, he/she must provide sufficient justification for business use. Unless prohibited by law, ***excessive usage may result in charge backs to the corporate subscriber or disciplinary action, up to and including termination of employment or of the business relationship.***

Corporate subscribers are expected to use their Company-issued wireless device to conduct Company business. Corporate subscribers should not use their personal wireless devices in place of the Company-issued device. Any Company-issued wireless devices that are issued to corporate subscribers and remain unused for over 90 days will be addressed on a case by case basis. Factors to be considered include, but are not limited to, the cost of suspending the account and the time remaining in the contract, with the goal of finding the most cost-effective solution for ELNA.

### 6.1 Corporate Wireless Device Expenses

All Company-issued wireless devices and related data plans are charged back to the cost center affiliated with the requisite level approver who approved the initial request. Monthly expenses for Company-issued wireless devices and related data plans are paid directly via central billing by ELNA. In conjunction with the IT Department, the Indirect Procurement Department will be monitoring monthly usage of all devices.

***The Company WILL NOT reimburse the expenses to a corporate subscriber if he/she orders or opens a wireless account outside of the Company's established process, without requisite level approval.***

## 6.2 Wireless Device Expense Reimbursement

Corporate subscribers, who have been provided a Company-issued wireless device, will not be reimbursed for expenses incurred in connection with the use of their personal wireless device. Corporate subscribers are expected only to conduct Company business using a Company-issued device.

If an employee, contractor or agent is not issued a Company wireless device, and voluntarily chooses to use a personal wireless device to conduct Company business for convenience, he or she will **not** be reimbursed for use of that personal wireless device. **However, if required to use a personal wireless device to conduct Company business, with no other Company-provided alternative, he or she should seek reimbursement via the Company's established reimbursement process. For additional clarification, please contact [webte@luxotticaretail.com](mailto:webte@luxotticaretail.com)**

## 7.0 Information Security Guidelines for Company Wireless Devices

It is the responsibility of all corporate subscribers who are connecting to the organizational network via a Company wireless device to ensure that all components of his/her connection remain as secure as his/her network access within the office. It is imperative that any Company wireless device used to conduct ELNA business be utilized appropriately, responsibly, and ethically. All corporate subscribers must adhere to applicable ELNA North America information technology policies with respect to network access both within and outside the office. Failure to do so will result in immediate suspension of a corporate subscriber's account.

The following rules must be observed:

1. All corporate subscribers must follow reasonable physical security measures with respect to Company-issued wireless devices. Users are expected to secure all Company-issued wireless devices whether they are in use and/or being carried.
2. Company-issued wireless devices are primarily intended for business use only.
3. Only corporate subscribers are permitted to use Company-issued wireless devices; such users should not allow non-corporate subscribers to use or modify any such device.
4. Corporate subscribers who use Company-issued wireless devices for personal purposes are responsible for any liability that may arise from such personal use, including any violation of law, regulation, or policy resulting from such use. The Company may be required by law to provide information stored on a Company-issued wireless device. Corporate subscribers should maintain no expectation of privacy in the use of Company-issued wireless devices or any information transmitted using or stored on such devices.
5. Corporate subscribers must act consistently with this policy when using Company-issued wireless devices. The final determination regarding whether conduct is consistent with this policy is reserved to local management in coordination with Human Resources and the Legal Department.
6. All corporate subscribers should use the least expensive option for phone calls, which are typically landline calls, unless traveling internationally and WIFI calling is available.

# Exhibit 1

## CORPORATE SERVICES APPROVAL FORM

This form must be completed anytime an employee requests any ONE of the following: Company Car, Corporate T&E Card, Company Cell Phone, MiFi/Aircard or Tablet. Orders will not be processed for any of these services until this form is filled out in its entirety and has the appropriate approver's signature.

Employee Name	Click or tap here to enter text.
Complete Home Address	Click or tap here to enter text.
Complete Office Address	Click or tap here to enter text.
Complete Ship to Address	Click or tap here to enter text.
Personal Cell phone	Click or tap here to enter text.
Business Email	Click or tap here to enter text.
Personal Email	Click or tap here to enter text.
Hire Date or Effective Date of Change	Click or tap to enter a date.
Position / Title	Click or tap here to enter text.
Brand	Click or tap here to enter text.
Employee ID	Click or tap here to enter text.
Cost Center	Click or tap here to enter text.
Economic Entity	Click or tap here to enter text.
Name of approving VP/SVP/EVP	Click or tap here to enter text.

The Following sections are to be completed by an Authorized Approver.  
 Approval is required by VP, SVP, or EVP.  
 For New Employees or Newly Promoted Employees (Please check all that apply.)

**Company Vehicle/Reimbursement Program**

**\*\*Fleet Administrator will be responsible for assigning company vehicles to eligible employees\*\***

**All new employees who are eligible will be enrolled in MOTUS**

Eligible for Company Vehicle/Reimbursement Program  US: Required to drive 5,000+ business miles / year CA: Required to drive 8,000+ kms / year	Choose an item.
What band level is the employee in	Choose an item.
Annual Business Miles	Click or tap here to enter text.

**Expats**

All qualified Expats will be eligible for a company vehicle based on their title.

Expat	Choose an item.
Level	Choose an item.

**Company T&E Credit Card Program**

Corporate Card Eligible	Choose an item.
Estimated Business Trips / month	Click or tap here to enter text.
Requested Monthly Credit Limit	Click or tap here to enter text.

Approvers Initials	Click or tap here to enter text.

\*Any requested monthly credit limit over \$3,000 will require additional review/approval and a supported business need.

**Company Wireless Program**

All users will be assigned a domestic plan unless otherwise noted. In addition, all international features will be blocked.

\*\*Aircards/MiFi's will only be issued to employees who need data access but do not have a company cell phone.

Company Cell Phone Eligible	Choose an item.
**Company AirCard/Mifi Eligible	Choose an item.
Does employee currently have a company air card?	Choose an item.
Which plan is the employee eligible for?	Choose an item.
Company Tablet Data Plan Only Eligible	Choose an item.
Which plan is the employee eligible for?	Choose an item.
Employee is authorized to replace existing phone equipment. (Approval required)	Choose an item.

\_\_\_\_\_  
Signature  
VP, SVP, EVP

\_\_\_\_\_  
Printed name

Please email completed forms to: [Corporate\\_Services@luxotticaretail.com](mailto:Corporate_Services@luxotticaretail.com) and copy [EmployeeServices@Essilorusa.com](mailto:EmployeeServices@Essilorusa.com)