

# Workplace Violence and Harassment Prevention Program

EssilorLuxottica ("the Company") is committed to employees' health and safety. Violence and Harassment in the workplace will not be tolerated. Every effort will be made to prevent such incidents from occurring by implementing a Workplace Violence and Harassment Prevention Program ("WVHPP" or "Program").

The WVHPP ensures that all employees, including supervisors and managers, adhere to work practices that are designed to make the workplace more safe/secure, and do not engage in verbal threats or physical actions which may create an unsafe work environment. This WVHPP supplements the Company's existing Workplace Violence, Harassment Free Workplace, Workplace Bullying, Domestic Violence and Open Door policies in the EssilorLuxottica Employee Guide, which should be referenced when looking for guidance on the behavior expectations that apply to all employees of EssilorLuxottica in North America.

A copy of this WVHPP is readily available to all employees on the Company's intranet platform, One EssilorLuxottica or through Human Resources. Questions about the WVHPP may be directed to the Company by submitting a consultation request via the online Human Resources portal on [mypersonaldeskna.luxottica.com](https://mypersonaldeskna.luxottica.com).

## **DEFINITIONS**

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

- **"Employee"**: any part-time, full-time, casual or temporary employee of the Company as well as any individual who would be considered a "worker". Worker means any person being paid by the company directly.
- **"Emergency"**: Unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.
- **"Serious injury or illness"**: Any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.
- **"Threat of Violence"**: Any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.
- **"Workplace Violence"**: Any act or threat of violence that occurs in a place of employment. Workplace Violence includes, but is not limited to, the following:
  - The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
  - Incidents involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
  - The following four workplace violence types:
    - **Type 1 violence** - Workplace violence committed by a person who has no legitimate business at the worksite, and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.

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- **Type 2 violence** - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.
- **Type 3 violence** - Workplace violence against an employee by a present or former employee, supervisor, or manager.
- **Type 4 violence** - Workplace violence committed in the workplace by a person who does not work there, but has or is known to have had a personal relationship with an employee.
  - Workplace Violence does not include lawful acts of self-defense or defense of others.
- **"Workplace Bullying"**: Includes a persistent pattern of mistreatment from others in the workplace that causes either physical or emotional harm. It can include such tactics as verbal, nonverbal, psychological, and physical abuse, as well as humiliation.
- **"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 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.
- **"Workplace sexual violence"**: any form of violence targeting sexuality or any other misconduct, including unwanted gestures, practices, comments, behaviors or attitudes with sexual connotations, whether they occur *once* or repeatedly, including violence relating to sexual and gender diversity.

## **RESPONSIBILITIES**

A cross-functional leadership team, made up of representatives from Human Resources, Employee Relations, Asset Protection, Risk Management, and Environmental Health & Safety, has the authority and responsibility for implementing the provisions of WPVV within EssilorLuxottica. Identified representatives for each function and responsibility are listed below:

Job Title/Position	WVHPP Responsibility(ies)
Asset Protection	Responsible for coordinating Essilor Luxottica's institutional and enterprise response, mitigation, education, and data collection regarding workplace violence.
Human Resources/ Employee Relations	Responsible for managing and investigating reports of workplace violence that involve co-workers and personal relationships, as well as complaints of workplace harassment, retaliation, and non-compliance with the WVHPP.
Health & Safety	Responsible for helping the Company meet compliance with Federal, State & local environmental, health and safety regulations. The EHS team participates in EssilorLuxottica's Workplace Violence Steering committee to support with regulatory inspection responses, assist with risk assessments, develop recommendations to address issues and help communicate to business unit leaders.
Risk Management	Responsible for facilitating the annual risk assessment and managing insurance claims related to Workplace Violence incidents.

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## Employee Responsibilities and Involvement

All employees, including managers and supervisors, are responsible for implementing and maintaining the WVHPP by using safe work practices, following all Company Workplace Violence and Harassment policies and procedures found in the Employee Guide, and for assisting in maintaining a safe and secure work environment. This may include, but is not limited to, the following:

- Taking the required workplace violence and harassment trainings.
- Notifying management immediately of any suspicious persons in the workplace.
- Contacting emergency services where appropriate (i.e., police, ambulance).
- Contacting building or complex security, when necessary.
- Becoming familiar with the location of all building exits and emergency response protocol.
- Being alert to the surroundings and removing oneself from immediate danger.

EssilorLuxottica encourages employee participation to further develop and implement the WVHPP. This includes providing feedback and recommendations to management or one of the cross-functional teams listed above on how to better implement the WVHPP and related initiatives to employees through communication campaigns, Company meetings and employee training programs. The Company will take all such recommendations seriously and will endeavor to incorporate them into the WVHPP where possible.

Prompt and accurate reporting of all workplace violence and harassment incidents is required, whether physical injury occurred or not. This allows the Company to quickly and thoroughly investigate the incident and respond in the best and safest way possible. Employees are expected to utilize one of the many available reporting procedures listed in the Incident Response section below, which are also referenced and explained in the Employee Guide.

Failure to meet these responsibilities may result in corrective action, up to and including termination of employment. Retaliation against employees who report workplace violence is prohibited and will not be tolerated.

## Management Responsibilities and Involvement

Management, in partnership with the cross functional teams listed above, is responsible for ensuring that all employees comply with the WVHPP. This requires the following actions to confirm that Company policies and procedures involving workplace violence, harassment and security are clearly communicated and understood by all employees:

- Posting or distributing WVHPP-related information, including Company posters on how employees can report workplace violence, harassment or a security incident or concern to the employer or law enforcement.
- Conducting regular meetings to discuss identification of WVHPP-related concerns/hazards, evaluating those hazards and/or concerns, and implementing corrective measures how to address them.
- Recognizing employees who demonstrate safe work practices and/or supportive bystander intervention behavior that promote the WVHPP in the workplace.
- Ensuring employees take and understand all required workplace violence and harassment related trainings and assessing and recommending when re-training may be needed.
- Coordinating, with the help of the Company's cross-functional team listed above,

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implementation of the WVHPP with other on-site employers (i.e., hosts, sublease doctors, staffing vendors, contractors) to ensure that those employers and employees understand their respective responsibilities outlined in the plan.

Any complaints or concerns of harassment or potential workplace violence hazards must be reviewed and escalated appropriately, as outlined below and in the Company's Open Door Policy. In addition, managers are expected to assist with all Company risk assessments and workplace inspections as directed.

Managers and supervisors are expected to enforce the rules of this program and all related workplace violence and harassment policies fairly and uniformly. Failure to meet any of these responsibilities listed above may result in corrective action, up to and including termination of employment.

## **WORKPLACE VIOLENCE AND HARASSMENT INCIDENT REPORTING PROCEDURE**

Any employee who is subjected to, a witness of, or has knowledge of any incident or threat of workplace violence or harassment, including domestic violence that would likely expose an employee to physical injury in the workplace and/or that may endanger an employee in the workplace, is required to immediately report the incident or threat to the Company using the following resources, which are explained in the Company's Open Door Policy and/or Asset Protection Toolkit:

- Employees may report the conduct or incident to their manager or, if not comfortable doing so, to the next higher manager.
- Employees may report the conduct to a Human Resources Business Partner or through the Company's online Human Resources portal.
- Employees may report the conduct or incident anonymously to the SpeakUp hotline at [speakup.essilorluxottica.com](https://speakup.essilorluxottica.com) or 844-303-0229.
- **Retail Only:** After an employee has contacted local emergency services and stabilized the scene, employees must report all robberies (violence during a theft), burglaries (after business hours thefts), and other violent incidents (such as shootings, physical assaults and bomb threats) to the attention of the AP Command Center immediately, by calling: 866-LUX-HELP (866-589-4357) and choosing Option 6.

For additional directions on reporting procedures based on incident type, refer to local practices or the Asset Protection poster in your location.

This Program does not preclude an employee from contacting the Police where he or she feels it is appropriate; nor is this Program intended to discourage an employee from taking steps to contact emergency services as needed. Further, this policy is not intended to discourage or prevent an employee from filing a complaint with any applicable human rights authority or from exercising any other legal rights pursuant to law.

Employees can use the Company's Open Door Policy and the above reporting procedures without fear of retaliation. Any person who attempts to deter or deters an employee's attempt to escalate a concern/incident, or who retaliates against an employee in any way for reporting an incident or concern, will be subject to Corrective Action, up to and including termination of employment.

## **EMERGENCY RESPONSE PROCEDURES**

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EssilorLuxottica has in place the following measures to handle actual or potential workplace violence and harassment emergencies:

## **Emergency Action Plans (EAP):**

- Our EAPs includes location-specific procedures for responding to violent and emergency incidents.
- An EAP is required at each workplace location so managers and employees can respond quickly and safely in the event of an emergency.
- Each EAP includes emergency procedures, emergency contact names and phone numbers, and an evacuation map.
- Depending on location, the EAP is communicated to employees and managers via postings or other employee-facing communications.
- Training is provided on an annual basis to ensure employees are familiar with these emergency protocols.

## **Asset Protection Toolkit:**

- The Asset Protection Toolkit provides best practices for workplace violence prevention and other important Asset Protection materials that may include:
  - Incident Reporting Guidelines to include Active Shooter/Robbery/Burglary/Threats
  - Reporting of Shoplifting Incidents and Associate/Customer Injuries
  - The 3Rs of Shoplifting Prevention
  - No Weapons Training and Policy
  - De-Escalation Training
  - Ethics & Compliance SpeakUp Hotline
  - Observations Checklist/Fitness for Duty Interview guidelines
  - Physical Security resources including Instakey and CCTV “How To” instructions
  - Emergency Contact information for their assigned Regional Manager of Investigations (RMI) and the EssilorLuxottica Helpline/Asset Protection Command Center

## **Crisis Intervention and Counseling Services:**

- The Company's Employee Assistance Program provides access to crisis intervention and counseling services for employees affected by workplace violence and harassment incidents.
- These services also establish support mechanisms for affected employees and their colleagues.

## **WORKPLACE VIOLENCE AND HARASSMENT RISK ASSESSMENT AND EVALUATION**

A workplace violence and harassment risk assessment is performed to identify and evaluate potential risks of violence and harassment within a workplace environment. The primary goal of such an assessment is to enhance the safety and well-being of employees by identifying and mitigating factors that may contribute to incidents of workplace violence and harassment.

Workplace violence and harassment risk assessments shall be conducted when the WVHPP is first established, after certain workplace violence and harassment incidents, and whenever the employer is made aware of a new or previously unrecognized hazard. Certain jurisdictions may require a formal risk assessment be conducted and documented on a periodic basis, particularly if there is interaction between employees and persons other than co-workers with a potential for

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threats or assaults.

Key factors to be evaluated during this assessment may include:

- **Identification of Risk Factors:** This includes internal factors, such as the nature of the work and the work environment, and external factors, such as geographical location, surrounding community, industry-specific risks, and family violence
- **Employee and Job Role Assessment:** Evaluate employees and their job roles to identify potential sources of stress, conflicts, or dissatisfaction.
- **History of Incidents:** Examine the location's history of violent incidents and analyze any reported incidents, grievances, or complaints related to workplace violence and harassment.
- **Security Measures and Policies:** Review existing security measures and workplace policies related to violence and harassment prevention.
- **Physical Design of the Workplace**
- **Communication and Reporting Systems:** Evaluate communication channels and reporting systems in place for employees to report concerns or incidents and ensure that there is a clear and accessible process for reporting potential threats or suspicious behavior.
- **Training and Awareness Programs:** Ensure that employees are educated on recognizing warning signs, conflict resolution, and reporting procedures for incidents of workplace violence and harassment.
- **Mitigation Strategies:** Evaluate and implement strategies to mitigate identified risks, which may include changes to policies, improvements in security measures, targeted interventions, and measures in place to protect psychological health and safety in the workplace.
- **Emergency Response Plan:** Ensure the existence of an emergency response plan that addresses potential violent incidents and provides guidelines for immediate actions.

Risk assessments will be completed by the onsite manager/designated personnel and supported by Asset Protection, Environmental Health & Safety, and/or Human Resources. For locations with Health & Safety Committees (HSC), this assessment will be completed with the support of the HSC and the results of the assessment will be presented to the HSC.

Employees may also provide feedback and suggestions at any time by following the reporting protocol identified above. That may include talking to their manager or Human Resources Business Partner, submitting a consultation request via on the online Human Resources portal on [mypersonaldeskna.luxottica.com](http://mypersonaldeskna.luxottica.com), or anonymously by contacting the SpeakUp hotline at [speakup.essilorluxottica.com](http://speakup.essilorluxottica.com) or 844-303-0229.

## **WORKPLACE VIOLENCE AND HARASSMENT HAZARD CORRECTION**

Identified workplace violence and harassment risks will be evaluated and corrected in a timely manner. In doing so, the store management team (or HSC) will work together with a cross-functional support team to determine and implement appropriate measures, where feasible, to address the identified risk. Such risk minimization measures may include:

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees required to correct the



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hazardous condition will be provided with the necessary protection.

- Making the workplace unattractive to robbers.
- Ensuring the adequacy of existing workplace violence and harassment policies and procedures
- Posting emergency telephone numbers for law enforcement, fire, and medical services
- Controlling access to, and freedom of movement within, the workplace by non-employees, including recently discharged employees or persons with whom one of our employees is having a dispute.
- Installing effective systems to warn others of a violent danger or to summon assistance, e.g., alarms or panic buttons.
- Ensuring employees have access to a telephone with an outside line, including a personal mobile device, when needed.
- Providing employee training/re-training(refreshers) on the WVHPP, or related topics, which could include, but are not limited to the following:
  - Recognizing and handling threatening or hostile situations that may lead to violent acts by customers or patients (e.g., de-escalation or active shooter training).
  - Ensuring that all reports of violent acts and harassment, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the person making the threat.
  - Improving how well our establishment's management and employees communicate with each other, understand the importance of psychological safety, and are aware of the signs of mental illness and substance abuse.
  - Procedures for reporting suspicious persons, activities, and packages.
  - Providing/reviewing employee, supervisor, and management training on Emergency Action Plan procedures.
  - Increasing awareness by employees, supervisors, and managers of the warning signs of potential workplace violence.
  - Ensuring adequate employee escape routes.
  - Ensuring that employee disciplinary and discharge procedures address the potential for workplace violence and harassment.
  - Establishing policies for prohibited practices, such as “no-weapons” and anti-bullying policies.

## **PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION**

After a workplace violence or harassment incident, the appropriate members of the WVHPP cross-functional team, or their designee(s), will implement the following post-incident procedures:

- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensure corrective actions are taken.
- Obtain any reports completed by law enforcement.
- Ensure support and resources, such as counseling services, employee assistance programs, and time off work are provided to affected employees.

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## Investigations

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 violence or 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 appropriately as determined by the circumstance. This may include an internal investigation conducted by an investigator or investigation team as determined by 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 a Company policy/procedure or of the WVHPP itself. The complainant will be advised that the investigation has been completed and resolved, but the investigator will not provide details of the outcome due to the need for confidentiality, unless legally required to do so. All details of the investigation will be summarized in an investigation report and stored with the other case notes and documents in the Company's case management system. Where applicable, the Company will provide the appropriate follow-up support to the impacted employee(s) who allegedly experienced the workplace violence, harassment or retaliation in accordance with local laws.

## Violent Incident Log

Where legally required (e.g., California), a Violent Incident Log will be used to track every workplace violence incident in that jurisdiction and will include information, such as:

- The date, time, and location of the incident.
- The workplace violence type or types, as defined above under Definitions, involved in the incident.
- A detailed description of the incident.
- A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.
- A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
- A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
- The type of incident, including, but not limited to, whether it involved any of the following:
  - Physical attack without a weapon, including, but not limited to, biting, choking, grabbing,



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- hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
- Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
- Threat of physical force or threat of the use of a weapon or other object.
- Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
- Animal attack.
- Other.
- Consequences of the incident, including, but not limited to:
  - Whether security or law enforcement was contacted and their response.
  - Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.
- Information about the person completing the log, including their name, job title, and the date completed.

In creating the Violent Incident Log, EssilorLuxottica will ensure that no personal identifying information is recorded or documented in the log. This includes information which would reveal identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

## **TRAINING AND EDUCATION**

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace violence and harassment policies and practices. This training will be implemented through a combination of online modules, communication campaigns, workplace posters, and review of the Employee Guide. Unless state/provincial or local law requires otherwise,\* training and instruction will generally take place upon hire and periodically thereafter as a best practice.

General workplace violence and security training and instruction includes, but is not limited to, the following:

- Explanation of the WVHPP and related programs
- Procedures for reporting any violent acts or threats of violence to the employer or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employees' jobs and corrective measures the employer has implemented.
- Measures to prevent or respond to workplace violence.
- Strategies to avoid physical harm and ways to defuse hostile or threatening situations.
- Procedures to contact Company and Emergency personnel for assistance.
- Employee routes of escape.

More specific workplace violence and harassment training modules may include, but are not limited to, the following:

- 3R's of Shoplifting Prevention
- De-Escalation Procedures for Employees and Managers
- Active Shooter Response Procedures
- Emergency Response and Evacuation Procedures
- Workplace Harassment for Employees and Managers
  - Workplace Harassment Fundamentals

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- How to respond to harassment
- Respectful behavior in a diverse environment
- Dating and social relationships
- Abusive conduct and bullying
- Gender identity, expression and sexual orientation
- How to make a complaint of workplace or sexual harassment
- Understanding complaints
- How to respond to complaints
- Managing after complaints
- Culture, respect and prevention
- Workplace Harassment and Bullying
- Bystander Intervention
- Domestic Violence Response Protocol
- Mental Health and Psychological Safety in the Workplace

*\*For California employees, training and instruction on the WVHPP will be provided as follows: (1) When the WVPP is first established; (2) Annually to ensure all employees understand and comply with the program; and (3) Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.*

## **RECORDKEEPING**

Unless otherwise required by law, the Company will create and maintain records related to the implementation and maintenance of the WVHPP for a minimum of five (5) years. These records will include, but are not limited to:

- Workplace Violence Risk assessments
- Incidents or threats of workplace violence and harassment, including investigations
- Hazard evaluation and corrective measures
- State or location-specific violence incident logs
- Workplace Violence and Harassment training records

Records may be kept either electronically or on paper and will be dependent on the type of workplace incident and employer location where it occurred. Employees who wish to review such records will be granted access where required and in accordance with applicable law. To request access to these records, employees must submit a written request to [HRCompliance@luxotticaretail.com](mailto:HRCompliance@luxotticaretail.com).

## **REVIEW AND REVISION OF THE WVHPP**

EssilorLuxottica will review the effectiveness of the plan and revised as needed according to the following schedule:

- At least annually.
- When a deficiency is observed or becomes apparent.

Evaluation of the WVHPP's effectiveness will include review of the following:

- Employee recommendations and suggestions
- Incident investigations and the violent incident log (where applicable).

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- Assessment of the effectiveness of security solutions and employee support
- Assessment procedures to ensure that workplace violence and harassment risks are being properly identified, evaluated, and corrected.

Any necessary revisions to the WVHPP will be made promptly and communicated to all employees.