

CONFLICT MINERALS POLICY

INTRODUCTION

As an international organization that interacts with employees, customers, suppliers and business partners in 150 different countries around the world, Luxottica places great importance on protecting the people and environments in the areas where Luxottica operates.

To see the beauty of life is the vision that inspires Luxottica's sustainable business approach and is an integral part of the Group's strategy. It stems from a notion of universal beauty that comes to life at the intersection of personal well-being, respect for the environment, ethics and the transparency of relations.

In 2012, the Securities and Exchange Commission, driven by the Dodd-Frank Wall Street Reform and Consumer Protection Act, adopted rules requiring public companies to report the use of conflict minerals (also called 3TG) in their products.

As a result, in 2013, Luxottica adopted the "Responsible Sourcing & Manufacturing Program", a global program that aims to achieve full alignment with Luxottica's and international standards in terms of ethics, labor, health & safety and environment. One of the main pillars of this program is to ensure the responsible procurement of all minerals used to make Luxottica products.

DEFINITIONS

Conflict minerals – or 3TG minerals – include tantalum, tin, tungsten and gold and their derivatives which are originated from the Democratic Republic of Congo (DRC) or an adjoining country (ref. countries in scope). Profits from mining operations in these regions often become a source of financing for rebel groups associated with human rights violations.

Countries in scope: Angola, Burundi, Central African Republic, Democratic Republic of Congo (also known as Congo – Kinshasa), Republic of the Congo (also known as Congo – Brazzaville), Rwanda, South Sudan, Tanzania, Uganda and Zambia.

Conflict Free means that a product does not contain 3TG minerals that directly or indirectly finance or benefit armed groups from the affected countries (which shall include any armed group identified as a perpetrator of serious human rights abuses).

EXPECTATIONS FROM VENDORS

Luxottica purchases from its vendors raw materials, metals, components and other products that may contain 3TG minerals. As part of its responsible sourcing efforts, Luxottica expects its vendors to obtain their 3TG minerals from environmentally and socially responsible sources and to be Conflict Free. Vendors are also generally encouraged by Luxottica to support industry efforts to enhance traceability and responsible sourcing practices in 3TG mineral supply chains.



More specifically, Luxottica requests:

- Vendors to have complete and up-to-date knowledge of the 3TG Mineral content of their products;
- All products provided to Luxottica to be Conflict Free;
- To source each 3TG mineral from a smelter or refiner that has obtained, with respect to the relevant 3TG Mineral, a “conflict-free” designation by a recognized industry group

RELEVANCE FOR LUXOTTICA

Even though Luxottica is no more listed on the New York Stock Exchange (NYSE), it has decided to continue its commitment towards a conflict free value chain. In addition, many Luxottica brands belong to US licensors which are required to comply with section 1502 of the Dodd-Frank Act and, as such, must file reports on their use of Conflict Minerals with the SEC under the Securities Exchange Act of 1934.

In order to conduct the compliance process and be ready to confirm its position upon Licensors’ requests, Luxottica must engage with vendors who supply products containing 3TG minerals (Tantalum, Tin or Tungsten or Gold), to conduct a conflict minerals assessment.

VENDORS ASSESSMENT

Luxottica evaluates its relationships with its vendors on an ongoing basis and specifically considers compliance with this policy when selecting and determining whether to retain vendors.

More specifically, requirements for vendors are the following:

- To develop and implement policies, due diligence measures and management systems that are reasonably designed to ensure that the supplied products are Conflict Free
- To advise Luxottica promptly if they believe that any product provided or expected to be provided to Luxottica is not Conflict Free
- To complete, timely upon request, Luxottica conflict minerals assessments.

REPORTING MECHANISM

Luxottica vendors can report concerns and possible violations of this policy to the following mailbox: LRSM@luxottica.com.

Reports will be kept confidential to the fullest extent practicable and permissible by applicable laws and regulations. Concerns should be submitted in English.

CONCLUSION

Luxottica commitment to responsible sourcing extends its efforts to work toward a Conflict Free supply chain. Luxottica expects all its vendors and stakeholders to support these efforts and encourages them to join industry initiatives to enhance responsible sourcing practices in 3TG minerals supply chains.