

## **Policy – anti slavery and human trafficking**

### **Aims of this policy**

Essilor manufactures and distributes ophthalmic lenses and equipment for eye care professionals to provide solutions to correct and protect visual health. Essilor UK is part of the world's leading ophthalmic optical lens group, Essilor International SA, the parent company located in Paris and whose products are distributed in over 130 countries around the world.

Essilor's mission to improve lives by improving sight, combined with the company's unique Principles and Values are at the heart of the Group's long-term commitment to sustainable development. The Group is recognised by a number of major global indices (such as DJSI, MSCI, Ethibel, etc.) for the strong alignment between its mission, strategy and contribution to society with regard to sustainable development.

This policy supports our commitment to limiting the risk of modern slavery and human trafficking occurring within our own business or infiltrating our supply chains or any other business relationship. At the Group level, Essilor is a signatory to the UN Global Compact's 10 Principles in the areas of and core values relating to Human Rights, labour, the Environment and anti corruption.

Essilor takes issues including, for example, safe and fair working conditions, human trafficking and labour exploitation extremely seriously.

This policy will be used to underpin and inform any statement relating to slavery and human trafficking that we are required to produce further increasing the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

### **What do we mean by modern slavery?**

Modern slavery can take many forms. It is a complex and multi-faceted problem. As a minimum standard, this policy covers five key criminal activities that are not tolerated within our operations or those of our suppliers and partners:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them.

- Child labour: whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

#### **Who does it concern?**

**The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, volunteers, interns and any other third party representative.**

**We expect all who have or seek to have a business relationship with the company to refer to this policy and act in accordance with its values.**

**Doing business with any third party who acknowledges and commits to comply with this policy is mandatory**

A copy of the Essilor Supplier Charter can also be found on the Group's corporate website [www.essilor.com](http://www.essilor.com)

#### **How we seek to embed our anti-slavery policy in practice**

Managers, supervisors and staff representatives have received training in the awareness and implications of Modern Slavery and Human Trafficking including bribery and corruption and all employees are expected to report any related activity or suspicion of same, immediately. Any such reports will be taken seriously and appropriate remedial action taken where necessary.

Essilor drives its supplier relationships on its Supplier Sustainability program whose main goal is to assess suppliers' CSR performance by ensuring all suppliers and subcontractors comply with the principles set out in the Supplier Charter (available on the Essilor.com website) and from a legal standpoint, they comply with general purchasing conditions in terms of respect for human rights (forced labour, child labour etc.)

Essilor will continue to review the effectiveness of its measures to combat modern slavery and human trafficking, within its operation including strengthening supply chain auditing and verification, staff training as appropriate and up-skilling any high risk suppliers including assessing their ability to detect and mitigate such risk. In 2017 a new auditing tool (Ecovadis) will be launched to assist in this process.

#### **Responsibility for this policy**

The UK and Ireland Corporate Social Responsibility Director will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the

All Functional Heads of Departments and Department Managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

### **Breaches of this policy**

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedures. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedures.

Any supplier found to be in breach of such ethical practices including the Modern Slavery Act 2015 shall be immediately removed from Essilor's Approved Supplier Register with the immediate cessation of any business without any liability to Essilor or Essilor Group companies. Essilor reserves the right to bring such malpractice to the attention of the relevant authorities including the Police, if necessary. Essilor expects its suppliers to operate similar practices throughout their own supply chains and will subject suppliers to audit to help ensure compliance.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

### **Status of this policy**

This anti-slavery and human trafficking policy will be reviewed by the UK and Ireland Corporate Social Responsibility Director on an annual basis.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

**Signed**

**Dated** 20<sup>th</sup> June 2017



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**Peter Smith**  
**Vice President**  
**Essilor Group UK & Ireland**



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**Nigel Corbett**  
**UK & Ireland Corporate Social Responsibility Director**