



LUXOTTICA MULTI-YEAR ACCESSIBILITY PLAN ONTARIO, CANADA

Introduction and Statement of Commitment

In 2005, the government of Ontario passed the *Accessibility for Ontarians with Disabilities Act* (the “AODA”). The AODA requires that Luxottica establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements of the Integrated Accessibility Standards (the “IAS”).

This multi-year accessibility plan (the “Accessibility Plan”) outlines Luxottica’s strategy to prevent and remove barriers for persons with disabilities and to address the current and future requirements of the IAS in order that Luxottica may fulfill its commitment as outlined in the Luxottica’s Integrated Accessibility Standards Policy for Ontario, Canada (the “Policy”).

General Accessibility Standards

Requirement	Responsible Individual/Department	Action	Status	Compliance Date
Accessibility Policy Develop, implement and maintain policies governing how Luxottica achieves or will achieve accessibility through meeting the requirements of the IAS. Statement of organizational commitment to meeting the accessibility needs of persons with disabilities in a timely	Compliance Department	Draft the policy and obtain management approvals.	Completed	January 1, 2014

<p>manner.</p> <p>Prepare one or more written documents describing the policies and make the policies publicly available and provide them in an accessible format upon request.</p>				
<p>Multi-Year Accessibility Plan</p> <p>Establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation</p> <p>Post the accessibility plan on the website and provide the plan in an accessible format upon request.</p> <p>Review and update the accessibility plan at least once every five years.</p>	<p>Compliance Department</p>	<p>Identify barriers to accessibility and develop and implement a multi-year accessibility plan</p> <p>Obtain management approvals</p> <p>Post plan on Luxottica's websites</p> <p>Diarize first review of the plan which at the latest, should take place before January 1, 2019</p>	<p>Completed</p>	<p>January 1, 2014</p>
<p>Training</p> <p>Provide training to all existing employees, volunteers and all persons who participate in the development of <i>AODA</i> Policies.</p>	<p>Human Resources Department</p>	<p>Develop in-house training program in the same manner as the training for the <i>Customer Service Standards</i> was developed. The training program may include a written and/or online component.</p>	<p>Customer Service Standards training ongoing. Additional training under IAS to be</p>	<p>January 1, 2015</p>

<p>Training must include:</p> <ul style="list-style-type: none"> i. the requirements of the IAS; the <i>Human Rights Code</i> as it pertains to persons with disabilities; and ii. the <i>AODA</i> Policies as required by the IAS. <p>Keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.</p> <p>Ensure that contractors providing goods, services and/or facilities on its behalf have received the training required under the IAS.</p>		<p>Identify and provide training to all employees, volunteers and persons involved in the development of Luxottica policies.</p> <p>Train new employees and volunteers hired during the orientation process</p> <p>Maintain records on training</p> <p>Amend service contracts to require that any contractors or other third parties providing goods, services or facilities on Luxottica's behalf receive the required training</p>	completed	
<p>Self-Service Kiosks</p> <p>Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.</p>	Brand Operations	<p>Luxottica has point of sale devices.</p> <p>Identify and educate appropriate individuals on accessibility considerations relevant to self-service kiosks used by Luxottica and take these requirements into consideration when purchasing or acquiring self-service kiosks</p>	Ongoing	January 1, 2014

Information and Communication Standards

Requirement	Responsible Individual/Department	Action	Status	Compliance Date
<p>Feedback</p> <p>Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.</p> <p>Notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures</p>	Customer Care Group	<p>Luxottica receives feedback in person, by mail, by phone (including TTY), and by email. Additionally, Luxottica maintains an accessibility hotline for requests for assistance and to provide feedback, including requests for Accessible Formats or Communication Supports..</p> <p>Notification about the availability of accessible feedback procedures is posted on Luxottica’s website.</p>	Ongoing	January 1, 2015
<p>Accessible Formats and Communication Supports</p> <p>Upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers</p>	Customer Care Group	Determine what Accessible Formats and Communication Supports are to be provided upon request. Luxottica already offers customers the option of using TTY technology and regularly accommodates requests for sign language interpreters in optical brand stores.	In progress	January 1, 2016

<p>accessible to persons with disabilities.</p> <p>Provide Accessible Formats and Communication Supports in a timely manner at a cost that is no more than the regular cost charged to other persons and in a manner that takes account the person's accessibility needs due to disability.</p> <p>Consult with the person making the request when determining the suitability of an Accessible Format or Communication Support and notify the public of the availability of same.</p>		<p>Ensure all requests are directed to the Customer Care Department and that the Customer Care Department understands its obligation to consult with the person making the request.</p> <p>Ensure all Store employees are aware of requirement and where to direct customer requests.</p> <p>Determine how the public will be notified about the availability of Accessible Formats and Communication Supports.</p>		
<p>Accessible Websites and Web Content</p> <p>Ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.</p> <p>By January 1, 2021 ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent</p>	<p>E-Commerce Team</p>	<p>The LensCrafters, Pearle Vision, and Sears Optical sites have not been refreshed since January 1, 2014. Sunglass Hut is working with a vendor to improve the accessibility of its site and ensure compliance with WCAG 2.0.</p>	<p>In progress</p>	<p>January 1, 2014</p> <p>New internet websites and web content on those sites at Level A.</p> <p>January 1, 2021</p> <p>All internet websites and web content on those sites at</p>

required by the IAS.				Level AA.
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Employment Standards

Requirement	Responsible Individual/Department	Action	Status	Compliance Date
<p>Recruitment</p> <p>Notify the public and employees about the availability of accommodation for applicants with disabilities in its recruitment processes</p>	Human Resources Department	<p>Develop statement regarding the commitment to provide accommodation during the recruitment, assessment and selection process.</p> <p>Include the statement in all job advertisements and in the written application form.</p> <p>Add instruction on the need to provide notice about the availability of accommodation during the recruitment, assessment and selection process to the new Manager's Guide.</p>	In progress	January 1, 2016
<p>Recruitment, assessment or selection process</p> <p>Notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.</p>	Human Resources Department	<p>Ensure managers are aware of obligation to consult with candidate and provide accommodation upon request in respect of the assessment and selection process.</p> <p>Current selection processes may include a sales audition in which candidates are asked to serve customers on the floor. In the future, the Company is</p>	In progress	January 1, 2016

<p>Consult with an applicant requesting accommodation to provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability</p>		<p>considering implementing pre-employment assessment testing. Accommodation in respect of these and any other assessment or selection tools shall be provided upon request.</p>		
<p>Notice to successful applicants</p> <p>Notify successful applicants of Luxottica's policies for accommodating employees with disabilities.</p>	<p>Human Resources Department</p>	<p>The Associate Guide contains policies on accommodating employees with disabilities. The new Associate Guide is scheduled to be distributed to all associates early in 2016.</p> <p>Personnel at managerial level and above have employment contracts. New employment contracts will include a statement about policies for accommodating employees with disabilities in employment.</p>	<p>In progress</p>	<p>January 1, 2016</p>
<p>Informing employees of supports</p> <p>Inform employees of policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p>	<p>Human Resources Department</p>	<p>The Associate Guide contains policies on accommodating employees with disabilities. The new Associate Guide is scheduled to be distributed to all associates early in 2016.</p>	<p>In progress</p>	<p>January 1, 2016</p>

<p>Provided to new employees as soon as practicable after commencing employment</p> <p>Provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities</p>				
<p>Accessible Formats and Communication Supports for employees</p> <p>Upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.</p> <p>Consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support.</p> <p>However where the needs of an employee with a disability</p>	<p>Human Resources Department</p>	<p>The provision of Accessible Formats and Communication Supports is one means of accommodation an employee can request. Accommodation, including Accessible Formats and Communication Supports, may be requested through the HR Solutions Group. Instructions on requesting an accommodation and contact information for the HR Solutions Group is included in the Company's policies on accommodating employees with disabilities contained in the Associate Guide.</p>	<p>In progress</p>	<p>January 1, 2016</p>

<p>may be accommodated in various different ways, Luxottica reserves the right to determine the type Accessible Format or Communication Support that will be provided in the circumstances.</p>				
<p>Workplace emergency response information</p> <p>Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Luxottica is aware of the need for accommodation due to the employee's disability.</p> <p>Provide this information as soon as practicable after becoming aware of the need for accommodation.</p> <p>With the consent of the employee, provide the workplace emergency response information to the person designated by Luxottica to provide assistance to the employee if the employee needs assistance by</p>	<p>Human Resources Department</p>	<p>The provision of individualized workplace emergency response information is one means of accommodation an employee can request. Continue to adhere to requirements under <i>Human Rights Code</i> and <i>AODA</i> by providing accommodation, including individualized workplace emergency response upon request.</p> <p>Requests for individualized workplace emergency response information received by managers are to be directed to the HR Solutions Group.</p>	<p>Ongoing</p>	<p>January 1, 2012</p>

<p>reason of disability</p> <p>Review individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when the company reviews its general emergency response policies.</p>				
<p>Documented individual accommodation plans</p> <p>Have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process must include the following elements:</p> <ul style="list-style-type: none"> i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. ii. The means by which the employee is assessed on an 	<p>Human Resources Department</p>	<p>Prepare policy on the development of documented individual accommodation plans that is responsive to the specific considerations identified in the IAS.</p> <p>Incorporate policy and considerations identified in the IAS into template questions used by HR Solutions Group when working with employee to provide appropriate accommodation.</p> <p>Provide training to HR Solutions Group to ensure an understanding of policy and new requirements to develop <i>documented</i> individual accommodation plans.</p>	<p>In progress</p>	<p>January 1, 2016</p>

<p>individual basis.</p> <p>iii. The manner in which Luxottica can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</p> <p>iv. The manner in which the employee can request the participation of a representative from his or her bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>v. The steps Luxottica will take to protect the privacy of the employee's personal</p>			
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<p>information.</p> <p>vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>viii. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p> <p>Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.</p> <p>Where required, an employee's individual accommodation plan will</p>				
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include individualized workplace emergency response information.				
<p>Return to Work Process</p> <p>Have in place a documented a return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.</p> <p>The return to work process must outline the steps Luxottica will take to facilitate the employee's return to work and will include documented individual accommodation plans as part of the process</p>	Human Resources Department	The Company is anticipating transitioning to a third party vendor to manage employees on medical leaves of absence. Work with vendor to develop protocol for the development of documented return to work plans for employees absent from work due to disability.	In progress	January 1, 2016
<p>Performance management</p> <p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	Human Resources Department	Continue to take accessibility needs into account when engaging in performance management consistent with the Company's long-standing obligations under the Ontario <i>Human Rights Code</i> . Ensure that Individual Accommodation Plans are consulted incorporated into the accommodation process.	In progress	January 1, 2016

<p>Career development and advancement</p> <p>Take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans when providing career development and advancement to employees with disabilities.</p>	<p>Human Resources Department</p>	<p>Continue to take accessibility needs into account when providing career development and advancement opportunities consistent with the Company's long-standing obligations under the Ontario <i>Human Rights Code</i>. Ensure that Individual Accommodation Plans are consulted incorporated into the accommodation process.</p>	<p>In progress</p>	<p>January 1, 2016</p>
<p>Redeployment</p> <p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p>	<p>Human Resources Department</p>	<p>Continue to take accessibility needs into account when redeploying employees with disabilities consistent with the Company's long-standing obligations under the Ontario <i>Human Rights Code</i>. Ensure that Individual Accommodation Plans are consulted and incorporated into the accommodation process.</p>	<p>In progress</p>	<p>January 1, 2016</p>

DESIGN OF PUBLIC PLACES

(The following requirements only apply to public spaces that are newly constructed or redeveloped on and after January 1, 2017.)

Description	Responsible Individual/Department	Action	Status	Compliance Date
<p>Exterior Paths of Travel</p> <p>Ensure that any exterior paths</p>	<p>Store Construction Department</p>	<p>Ensure necessary individuals are trained on the requirements of the Design of</p>	<p>In progress</p>	<p>January 1, 2017</p>

of travel, such as outdoor sidewalks and walkways, ramps, stairs and curb ramps that it constructs or redevelops and intends to maintain meet the technical requirements of the Design of Public Places Standards.		Public Spaces Standards. No further action is necessary, unless Luxottica builds new or makes major changes to existing exterior paths of travel.		
Off-Street Parking Ensure that when Luxottica constructs new or redevelops off-street parking facilities that it intends to maintain, the off-street parking facilities meet the requirements of the Design of Public Places Standards. Off-street parking is a space where you can park your vehicle temporarily that is not on a public road or street.	Store Construction Department	Ensure necessary individuals are trained on the requirements of the Design of Public Spaces Standards. No further action is necessary, unless Luxottica builds new or makes major changes to off-street parking facilities.	In progress	January 1, 2017
Obtaining Services Ensure that Luxottica meets the requirements of the Design of Public Places Standards in respect all newly constructed service counters.	Store Construction Department	Ensure necessary individuals are trained on the requirements of the Design of Public Spaces Standards. No further action is necessary, unless Luxottica purchases new or makes major changes to existing service counters.	In progress	January 1, 2017
Maintenance Ensure accessibility plans		Ensure individuals responsible for such construction or redevelopment are aware of	In progress	January 1, 2017

<p>include:</p> <ol style="list-style-type: none"> 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces. 2. Procedures for dealing with temporary disruptions when accessible elements required are not in working order. 		<p>requirements</p> <p>If such construction or redevelopment happens in the future, amend this Accessibility Plan to incorporate procedures for preventative and emergency maintenance of accessibility elements and procedures for addressing temporary disruptions in respect of same</p>		
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