## DATE

Mr. Francesco Milleri, CEO EssilorLuxottica 1-6 rue Paul Cézanne, 75008 Paris, France

## **Re: OECD Mediation Process with Labor Unions**

Dear Mr. Milleri:

We, the undersigned investors and public officials, representing over \$### in assets under management and advisement, are writing to request that EssilorLuxottica accept and engage constructively with the mediation process offered by the National Contact Points (NCPs) by the OECD Guidelines for Multinational Enterprises (the "OECD Guidelines, "MNEs") to resolve a specific instance complaint that was filed by the labor organizations Communications Workers of America, the AFL-CIO, IndustriALL, and UNI regarding the alleged violation of workers' rights to freedom of association at Luxottica's McDonough, Georgia facility.

According to press reports, the labor organizations allege that EssilorLuxottica is acting in violation of its international and social responsibilities as an employer under the OECD Guidelines by preventing over 2,000 employees at the McDonough, Georgia facility from exercising their right to freedom of association via "aggressive and fear-inducing" interference tactics. We believe that EssilorLuxottica should abide by its own commitments to comply with international standards and best practices and engage in good faith with workers to maintain positive labor relations and avoid business disruptions.

In the last 20 years, the NCP mediation process has successfully resolved over 500 disputes between corporations and various stakeholders. We believe it is in the company's best interests to follow international procedures that have a documented history of reaching mutually agreeable outcomes for all parties. Moreover, the company should engage constructively in order to avoid negative findings by the NCPs that it violated the OECD Guidelines for MNEs, which has the potential to create reputational and brand damage that affect shareholder value.

The formation of labor unions is a fundamental human right recognized under international law. Employees exercising their right to form a union is recognized by the following international institutions:

- The OECD Guidelines for Multinational Enterprises, Section IV. Human Rights and Section V.
  Employment and Industrial Relations
- The Universal Declaration of Human Rights, Article 23.4
- The United Nations Guiding Principles on Business and Human Rights
- International Labour Organization, Freedom of Association and Protection of the Right to Organise Convention (No. 87) and Right to Organise and Collective Bargaining Convention (No. 98):

The ability of workers to organize, act concertedly, and engage in collective bargaining is an important human right that can be a net positive for companies and investors, and good for society. In contrast, allegations that EssilorLuxottica is not respecting its workers' rights to exercise their freedom to organize raises reputational and legal risks for investors. We therefore urge EssilorLuxottica to fully observe its

obligations to respect workers' rights under international law by engaging constructively and in good faith with the mediation process offered by the NCPs.

Sincerely,