



VisionExpress

Modern slavery statement

2024

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Introduction

As a member of the EssilorLuxottica Group, Vision Express recognises its responsibility and is committed to addressing and preventing the risk of modern slavery in the organisation and its supply chains. Our statement sets out how we comply with the Modern Slavery Act and continue to embed anti-slavery activity within our standard practice.



Organisational Structure, Business and Supply Chain

Vision Express is one of the largest optical retailers in the UK with 557 stores nationwide. With around 5,700 colleagues, Vision Express makes a significant difference to the communities it operates within, and the organisations it chooses to support.

We are a member of the EssilorLuxottica group and transitioning our alignment from our previous parent company, GrandVision. EssilorLuxottica are a global leader with 180,000 talented employees committed to providing vision care and eyewear products that meet the individual needs and style aspirations of every consumer. The unique business model and relentless pursuit of operational excellence ensure that consumers everywhere have access to products that have been rigorously tested to meet internationally recognized standards, from the simplest pair of glasses to the most sophisticated custom-made lenses and branded eyewear.

With an eyecare and eyewear business that covers every stage of the value chain, EssilorLuxottica relentlessly pursues operational excellence to offer the best visual experience to consumers everywhere in the world.

The Group is committed to making continuous improvements to workers' employment and workplace conditions including, but not limited to, the prevention of forced, bonded and trafficked labour. This is supported by the Group's policies and initiatives and is endorsed by a committed organisation and leadership.

For EssilorLuxottica, supply chain efficiency is fundamental to guarantee high quality of its products and services and contributes to maintaining and enhancing the Company's reputation. EssilorLuxottica's responsible sourcing approach is rooted in the principles stated in the Company's Code of Ethics and respect of international regulations and local laws, including the International Labor Organization (ILO) Conventions, United Nations Global Compact Principles and specific selected criteria, such as SA8000 certification.

Organisational Policies

- The EssilorLuxottica Group and Vision Express are committed to ensuring that we act ethically and with integrity in our business relationships. EssilorLuxottica sets out clear policies that must be complied with by each business, across all countries in which we operate.
- The EssilorLuxottica Code of Ethics sets out the principles representing the minimum set of standards that cannot be compromised and that must guide our behaviour as a company. It outlines the principles to which all EssilorLuxottica employees, contractors, vendors, and suppliers worldwide, are expected to adhere in their daily work.

The Code of Ethics helps to ensure all EssilorLuxottica employees and all those who enter into agreements or establish relations with EssilorLuxottica are fulfilling this commitment and protecting our business, our people and our partners every day, everywhere across the globe.

All those working at and for EssilorLuxottica must ensure compliance with the principles of this Code of Ethics as part of their duties and responsibilities.

A copy of the EssilorLuxottica Code of Ethics can be found on their website. The EssilorLuxottica Statement Regarding the Fight Against Modern Slavery is also available on the EssilorLuxottica website.

Vision Express Policies

Vision Express policies support the values and commitments made by EssilorLuxottica. The following policies work collectively to assess, prevent and mitigate the risk of modern slavery. All policies are developed and reviewed by a Policy Steering Group and widely communicated internally and to relevant external stakeholders.

- **Vision Express Modern Slavery Policy**
We have a zero tolerance approach to modern slavery; this policy highlights the responsibility of those working for the organisation to prevent, detect and report such violations.
- **Vision Express Whistleblowing Policy**
Should colleagues have any concerns in relation to modern slavery, they may raise the issue in confidence by contacting our whistleblowing hotline or by email.
- **Vision Express Remuneration Policy**
The policy ensures the fair and equitable treatment of all colleagues and is committed to the principle of equal pay in employment.
- **Safeguarding Policy & Committee**
This policy and committee are dedicated to safeguarding and promoting the welfare of all our colleagues, with particular focus on young workers and apprentices.

Assessing and Managing Risk

We understand that our main exposure to modern slavery is in our products supply chains, where we have undertaken activity to minimise such risk.

The Group does not tolerate forced labour either within its business or within its supply chain.

The Group expects its supply chain (whether direct suppliers or those that directly or indirectly supply the direct suppliers) to share the same values.

The Group approach of its supply chain is aimed at preventing the risk of serious cases of non-compliance with sensitive topics including child labour and use of forced work when selecting and monitoring suppliers, in any country.

To ensure this, qualified third parties assess suppliers' environmental and social performance through either a self-assessment platform or onsite audits.

In all our businesses and across our supply chain, we have a duty to ensure that international standards and local employment laws are always adhered to, and that undeclared work, child labour, forced work, and any other inappropriate employment conditions are prevented. Consequently, we seek suppliers whose operational practices comply with applicable laws and regulations and, more generally, that protect the dignity of human beings, the health and safety of workers and the environment at large.

The following areas have been identified as carrying the highest potential risk of slavery and human trafficking taking place in the Vision Express group of companies:

- **Migrant / Agency labour in our stores and the Vision Express Tech Centre**

Full eligibility to work checks are completed prior to employment and are system driven throughout our recruitment journey. Our teams are trained to report any concerns in relation to safeguarding either relating to internal or external concerns.

There is a central payroll function which provides transparency over the payment of colleagues.

- **Third Party Agency Labour**

Our Store Support Centre, joint venture companies and franchisees work locally with several third party employment agencies and employment businesses under formal agreements.

Due Diligence Process

GrandVision ensures that all suppliers receive and acknowledge a copy of our Responsible Sourcing Policy. We verify compliance of the suppliers with the GrandVision Supplier Code of Conduct through the use of regular third party audits. All colleagues engaged in procurement and with suppliers also have responsibility and accountability for compliance with the GrandVision Supplier Code of Conduct.

“Employees acting in contravention of the commitments set forth in this Code of Conduct may encounter disciplinary measures, ranging from a warning, coaching, training, written reprimand, deduction of salary, or transfer up to suspension or dismissal/termination of contract. In addition, bribery and corruption violations may lead to substantial fines and imprisonment.” **GrandVision, Code of Conduct**

Sourcing our Suppliers Responsibly

As a trustworthy partner we are committed to ensuring we deal with suppliers that also recognise their responsibility to the people they employ and the communities they affect. GrandVision looks at its entire value chain for opportunities to foster economic stability among its suppliers.

We are committed to business practices that do not infringe on human rights and that are aligned to the various international standards for responsible business conduct, including the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on the Fundamental Principles and Rights at Work.

Through our Supplier Code of Conduct, we clearly communicate our expectations in these areas and assess supplier performance. We then work with suppliers to ensure that any issues are continuously addressed.

The GrandVision Supplier Code of Conduct provides the following key principles:

- Suppliers will permit GrandVision Group or its appointed representatives to access and audit the plants where the products or parts are manufactured, in order to investigate the proper accomplishment of the obligations provided for in this agreement and in the relevant contracts.
- Upon prior arrangement with the Supplier, the GrandVision Group will have the right to carry out, either itself or through an agent, quality as well as Code of Conduct audits in the Supplier’s business premises.

Performance Indicators

We measure the effectiveness of the steps we are taking by tracking:

- Incidents reported by our colleagues (whistleblowing or otherwise), or the public or law enforcement agencies.
- We did not have any reported incidents in 2023/24.
- Satisfactory receipt and assessment of information received from suppliers.
- Regular review of staff training and ensuring all staff complete relevant training modules through our on-line portal.

Training

As part of our commitment to compliance and understanding, our colleagues are required to complete the GrandVision Code of Conduct training annually.

This is tailored depending on the role the individual and their likely exposure to certain risk situations. The policy is highlighted in induction

Our Progress

We hold Slavery and Human Trafficking statements from our local suppliers and communicate our minimum labour standards and the consequences if compliance is not as we expect, with all suppliers.

Business Risk Review Process - Internal compliance against our standards for Modern Slavery and Ethical Business Conduct is regularly reviewed as a key part of our quarterly business risk review undertaken by the executive management.

We regularly review our agency relationships and all have stringent contracts in place and adhere to clear and robust compliance standards.

We commit to reviewing this statement each year.



Nick Coton
Chief Financial Officer

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