



2435 Commerce Avenue, Building 2200, Duluth, GA 30096

Supplier Code of Conduct

National Vision is committed to complying with the law and addressing the environmental and social impacts arising from its operations. We seek to work with suppliers who share our commitment and hold themselves to high standards of business conduct and ethics. This Supplier Code of Conduct sets out our basic expectations on these matters for our suppliers.

Note: This Code contains general expectations applicable to all suppliers to National Vision. Particular supplier contracts may contain more specific provisions addressing some of these same issues. Nothing in this Supplier Code of Conduct is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this document and any other provision of a particular contract, the other provision will control.

Expectations for supplier conduct

This Supplier Code of Conduct outlines the minimum set of standards of responsible supplier management of ethics, labor, the environment, health and safety, and related management systems. The Supplier Code of Conduct should be read in conjunction with our other policies, available on our [website](#).

This Code contains general requirements applicable to all suppliers to National Vision.

Laws and Regulations:

Suppliers must comply with all applicable laws and regulations of the countries in which they operate.

Labor Standards, Health and Safety

Across our operations and those of our value chain, we work to ensure international standards for labor, health and safety are met. Key expectations regarding labor standards include:

- Wage and Benefits: Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to their compensation for regular hours of work, workers must be compensated for overtime hours at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly compensation rate.
- Hours of Work: Suppliers must ensure that workers must not be required to work more than the number of permitted regular and overtime hours allowed by local law. In addition, except in extraordinary business circumstances, all workers should be entitled to at least one day off in every consecutive seven day period.

- Health and Safety: Suppliers must provide their workers with a clean, safe and healthy work environment in compliance with all legal requirements for workplace health and safety in the countries in which they operate. This includes residential facilities, if applicable.

Human Rights

National Vision is committed to respecting human rights across its operations. We recognize the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Key expectations for our suppliers regarding human rights include:

- Child Labor: Suppliers must not employ workers younger than the greater of (a) 15 years of age (or 14 where permitted by the local law consistent with International Labor Organization guidelines) or (b) the age for completing compulsory education or (c) the minimum age established by local law. In addition, Suppliers must comply with all local legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages, and working conditions.
- Forced Labor: Suppliers must not use involuntary or forced labor, whether indentured, bonded, prison or otherwise.
- Harassment: Suppliers must treat all workers with respect and dignity. No worker shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, Suppliers will not use monetary fines as a disciplinary practice.
- Nondiscrimination: Suppliers must ensure that the terms and conditions of employment – including hiring, remuneration, benefits, advancement, termination and retirement – are based on ability and not on criteria that are impermissible under local law.
- Women's Rights: Suppliers will ensure men and women workers receive fair and comparable wages, hours, and benefits for comparable work. Pregnancy tests will not be a condition of employment, and pregnancy testing – to the extent provided – will be voluntary. In addition, workers will not be forced to use contraception.
- Freedom of Association and Collective Bargaining: Suppliers must recognize and respect the rights of workers to exercise lawful rights of free association, including joining or not joining any association. Suppliers must also respect any legal rights of workers to bargain collectively.

Environmental impacts

National Vision strives to optimize its resource use and minimize the environmental impact across its value chain. Key expectations regarding environmental impact include:

- Environment: Suppliers must comply with all applicable regulatory requirements regarding the environment, and should maintain an environmental, health and safety management system which underpins and proves compliance with all such regulatory requirements.

Ethical business conduct

National Vision adheres to strict standards regarding fair and ethical business conduct, and we expect the same across the company's value chain. Our expectations related to ethical business conduct include:

- Preventing Bribery & Corruption: All corruption, bribery, extortion, embezzlement, and similar practices are prohibited. Suppliers do not offer, request or accept bribes or permit subcontractors or others to do so on their behalf. Suppliers will implement appropriate, ongoing anti-bribery and anti-corruption policies and training.
- Preventing Conflicts of Interest: Suppliers do not allow personal or family interest to influence their independence or personal judgment.
- Competition: Suppliers only seek competitive advantage through lawful means and will conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust and competition laws.
- Subcontracting: This Supplier Code of Conduct is intended to apply to all entities in National Vision's supply chain, including subcontractors and other suppliers beyond those entities with whom we may deal with directly (i.e. Tier 2+ suppliers). Suppliers who have assented to this Code as part of their engagement with us, are required to make this Code available to their suppliers and/or subcontractors.

Supplier engagement

National Vision is committed to engaging with our suppliers. Engagement may include surveys, email communication, and regular auditing of suppliers to ensure compliance with the topics highlighted in this Code of Conduct document.

- Communication: Suppliers must communicate the provisions of the Code of Conduct to workers and supervisors.
- Monitoring: Suppliers must maintain on site all documentation necessary to demonstrate compliance with this Code of Conduct.
- Corrective actions: Suppliers are expected to take necessary corrective actions to promptly remediate any noncompliance. Suppliers must allow follow-up visits from National Vision representatives to confirm corrective actions have been taken when necessary.

Reporting violations: National Vision contracts with In Touch, an independent third-party company, to serve as a communication channel to management. Associates and Suppliers may use the In Touch Compliance Helpline to ask questions, seek guidance, or report concerns anonymously and confidentially. To use the In Touch Compliance Helpline:

1. Call the In Touch Compliance Helpline at 1-855-684-4686; or
2. Email the In Touch Compliance Helpline at NVI@GetInTouch.com.

Code review and implementation

Oversight of our Supplier Code of Conduct is a responsibility of the Nominating and Corporate Governance Committee of National Vision's Board of Directors and is implemented by the Corporate Responsibility Steering Committee, which comprises members of National Vision's senior management team. National Vision's General Counsel is responsible for coordinating a regular review of this Supplier Code of Conduct .

Last updated: August 2023