

National Vision Holdings, Inc. Conflict Mineral Policy

National Vision Holdings, Inc. ("National Vision") is dedicated to sourcing all components and materials used to produce its private label products from vendors that share our values and standards regarding human rights, environmental responsibility, and ethics.

The Conflict Minerals Rule ("Rule") was adopted by the U.S. Securities and Exchange Commission under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Rule requires publicly traded companies to examine their supply chain and report annually on the presence of conflict minerals (which currently includes columbite-tantalite (coltan; i.e., tantalum); cassiterite (i.e., tin); wolframite (i.e., tungsten); gold and/or their derivatives, or "3TG") originating in the Democratic Republic of the Congo or the nine adjoining countries of Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia ("Covered Countries"), to the extent any 3TG are in the products they manufacture or contract to manufacture and such 3TG are necessary to the functionality or production of a product.

National Vision supports the goal of ending violence, human rights violations and environmental devastation in the Covered Countries. National Vision is committed to:

- The aims and objectives of the Rule regarding conflict minerals.
- Complying with the Rule and working with our supply chain to improve the sourcing of 3TG in our products.

Questions regarding this Conflict Minerals Policy Statement can be addressed to legal@nationalvision.com with the subject "Conflict Minerals."

Last updated: December 6, 2019