



HOYA Supplier Code of Conduct

Preface

Hoya as a group of companies has established a set of principles that guide our every decision and action. In accordance with such principles, all employees as well as the management of Hoya are absolutely committed to legal compliance and ethical practices.

All providers of goods and services, including but not limited to suppliers, vendors, contractors, consultants and agents (all hereinafter referred to as "Suppliers"), who do business with Hoya's worldwide entities must comply with this Supplier Code of Conduct. At a minimum, Suppliers must also require their next tier suppliers to acknowledge and implement this Code.

I. Introduction

Fundamental to this Code is the understanding that a business, in all of its activities and at any time, must operate in full compliance with the laws, rules and regulations of the countries in which it operates. Hoya expects the Suppliers to abide by such general rule as a basis and precondition for the business relationship. Further and more specifically, the following is required:

II. Labor

The following labor standards apply to all workers, including temporary, migrant, student, contract, direct employees, and any other type of worker.

1. Freely chosen employment

Forced, bonded or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used. We do not accept child labor, forced labor, or human trafficking of any kind. Also, we will respect individual human rights and will not conduct business with supply chains which engage in any form of child labor, forced labor, or human trafficking. Suppliers commit to ensure that slavery and human trafficking are not taking place in their business and supply chains.

2. Child Labor and Young Workers

Suppliers shall not allow child labor in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age of completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.

Young workers (under the age of 18) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

3. Working conditions and benefits

Compensation paid to workers shall comply with all applicable laws, including those related to minimum wages, overtime hours and legally mandated benefits.

Workweeks are not to exceed the maximum set by local law, except in emergency or unusual situations to the extent permitted by local law.

Suppliers must accept all applicable laws regarding childcare leave, family care leave, paid vacation and not tolerate any discrimination or harassment concerning pregnancy, childbirth, childcare leave, or nursing care leave.

4. Humane Treatment and Non-Discrimination

Supplier shall not use or tolerate any harsh or inhumane treatment or the threat of such treatment. Further, Supplier shall not engage in or tolerate any kind of harassment, including but not limited to sexual harassment, or unlawful discrimination.

5. Freedom of association

Suppliers shall conform with and respect all laws which confer to workers the right to form and join trade unions of their own choosing, to bargain collectively as well as to refrain from joining associations.

III. Health and Safety

Suppliers commit to the task of minimizing the incidence of work-related injury and illness. To that end, the following health and safety standards shall apply.

1. Occupational Safety

Worker exposure to safety hazards is to be controlled through proper design and processes. To the extent that hazards cannot be adequately controlled by these means, workers are to be provided with appropriate personal protective equipment.

Production and other machinery shall be evaluated for safety hazards and such hazards shall be managed as above.

2. Occupational Injury and Illness

Procedures are to be in place to manage occupational injury and illness, including provisions to investigate cases and implement corrective action to minimize their causes, and facilitate the return of workers to work.

3. Industrial Hygiene

Worker exposure to chemical, physical and biological agents is to be identified, evaluated and controlled by engineering or administrative controls. To the extent that hazards cannot be adequately controlled by these means, appropriate personal protective equipment shall be provided.

4. Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including appropriate fire detection and suppression equipment, evacuation procedures and exit facilities.

5. Training

Supplier shall provide workers with appropriate workplace health and safety training, including training on personal protective equipment, where applicable, and on emergency plans.

IV. Environmental

Protecting the environment is a global concern. We are committed to conducting our business in a safe and environmentally responsible manner and we expect the following from Supplier.

1. Environmental Permits

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained and kept current at all times.

2. Applicable Rules

All products, components or substances as well as all production processes must meet the requirements of all applicable law for the country and region in which Supplier operates, as a minimum.

If we provide any additional material to Suppliers consisting of any rules, regulations or policies on environmental matters, including but not limited to environmental permits and reporting, pollution prevention and resource reduction, hazardous substances, wastewater and solid waste, air emissions, materials restrictions, storm water management, and/or energy consumption and greenhouse gas emissions, Suppliers shall also strictly follow such provisions.

V. Ethics and Business Governance

We expect our Suppliers to comply with all applicable law, including but not limited to the UK Bribery Act and the United States Foreign Corrupt Practices Act, and to uphold high standards of ethics. A specific focus for Hoya is compliance in the following fields:

1. Anti-Corruption/ Gifts and Entertainment

Hoya requires from Suppliers to comply fully and in all transactions with all business partners with the applicable laws and regulations of anti-corruption and anti-bribery, including but not limited to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the UK Bribery Act, the United States Foreign Corrupt Practices Act, and any further or stricter local rules.

For clarification, bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party in

order to obtain or retain business, direct business to any third party, or otherwise gain an improper advantage.

In case Hoya has reason to believe in good faith that Suppliers do not comply with any of the above mentioned rules, to the extent permitted by law, Hoya shall be entitled to withhold any payment due to such Suppliers, and/or terminate the business relationship with immediate effect. Hoya is not liable to Suppliers for any loss or damage related to Hoya's decision to exercise its right under this provision.

Suppliers shall offer and accept any gifts and entertainment to or by business partners and/or governmental officials only within the scope of the applicable rules. We expect Suppliers to be aware of any of such rules that might apply, including but not limited to those that apply worldwide and/or outside of the respective countries of origin, e.g. the UK Bribery Act and the United States Foreign Corrupt Practices Act.

2. Business Integrity

Further to the above, Supplier shall not engage nor tolerate any form of extortion and embezzlement. Supplier shall abide by all applicable rules regarding fair competition. All business dealings shall be transparently performed and accurately reflected in Suppliers' books.

3. International Peace and Security

The international community regulates export under various treaties and agreements to prevent arms from getting into the hands of groups that present security concerns. Certain products and technologies can be used for the production of peaceful products as well as for weapons. Hence the export is strictly regulated. Suppliers shall abide by all export control legislation applicable to the region and the products Suppliers offer. Suppliers shall support us with all information and documentation needed to fulfill the preconditions of any export control regulation completely and without undue delay.

4. Duty of Confidentiality, Intellectual Property

Technical information is of great importance to us in staying competitive and must be protected from leakage. This also applies to confidential information on new inventions or co-developed items.

5. Data Privacy

We are committed to complying with all applicable privacy and data protection laws, wherever we do business. Suppliers must respect their employees' privacy. Any personal information Hoya collects, regarding employees or any third party, will be treated with care, protected, and used lawfully and properly.

6. Anti-Social Forces/ Organized Crime

Anti-Social Forces means

- a) an organized crime group, a member of such group, or any association of organized crime groups, or any equivalent to the aforementioned, regardless of the form of organization or legal form, or

- b) a person or group who themselves or through the use of third parties conducts demands with the means of violence, conducts unreasonable demands beyond its legal entitlement, uses fraudulent means, or any equivalent of the above.

Suppliers warrant and represent to not fall themselves under the above definition of Anti-Social Forces. Further, Suppliers shall not have any relationship with Anti-Social-Forces that shows the involvement of Anti-Social-Forces in Suppliers' management, that shows reliance on Anti-Social Forces, that consists of any kind of cooperation with or funding of Anti-Social Forces or that is socially condemnable.

Notwithstanding any other applicable legal remedies, Hoya and any of Hoya's worldwide entities shall be entitled to terminate any agreement with Suppliers who do not operate in accordance with this clause V.6 with immediate effect for good cause.

7. Responsible Sourcing of Minerals

Suppliers shall have a policy to reasonably assure that the columbite-tantalite (coltan), cassiterite, gold, wolframite, any of their derivatives, including but not limited to tantalum, tin, and tungsten, or any other mineral as defined as conflict mineral in Sec. 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act, in the products, parts, components, and materials they manufacture does not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to Hoya upon request.

VI. Questions and Reporting

Supplier shall direct any questions on this Code to his her direct contact at Hoya. Violations of this Code can be reported to supplierconduct@hoya.com. Hoya will, notwithstanding legal requirements for disclosure, use reasonable effort to maintain the confidentiality of the identity of anyone reporting a violation of this Code and still investigate any reported violation.

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