

HOYA Group Human Rights Policy

1. Basic Approach

Respecting human rights is one of the most important principles we uphold when conducting HOYA Group business. The HOYA Group recognizes that it may impact the human rights of various stakeholders both inside and outside the company when conducting its business activities. We strive to ensure that we neither violate human rights ourselves nor facilitate the violation of human rights.

Our human rights policy is based on the HOYA Group's corporate mission and basic management principles and is designed to clarify the HOYA Group's stance on upholding human rights.

2. Applicable Scope of the Human Rights Policy

The policy will apply to all HOYA Group directors, executive officers and employees. We also encourage companies across the HOYA Group supply chain and other business partners to respect human rights and avoid any infringement of human rights.

3. Complying with International Norms

HOYA supports and upholds the following international norms:

- The United Nations International Bill of Human Rights*¹
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work*²
- The United Nations Guiding Principles on Business and Human Rights*³
- The Ten Principles of the United Nations Global Compact*⁴

*¹ The International Bill of Human Rights is a collective term that covers the Universal Declaration of Human Rights and the two international covenants that shaped that treaty: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

*² The Declaration on Fundamental Principles and Rights at Work was formed to determine the minimum standards that should be observed in five areas: freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labor; the effective abolition of child labor; the elimination of discrimination in respect of employment and occupation; and a safe and healthy working environment.

*³ The Guiding Principles on Business and Human Rights are a set of guidelines relating to business and human rights issues for states and companies to specifically implement within three pillars: The State Duty to Protect Human Rights; The Corporate Responsibility to Respect Human Rights; and Access to Remedy.

*⁴ The Global Compact sets forth 10 principles that companies should comply with within the four areas of human

rights, labor, environment, and anti-corruption.

The HOYA Group shall comply with the laws and regulations of each country and region in which it conducts business activities. If a conflict exists between the laws and regulations of a particular country or region and international human rights norms, we shall pursue ways to uphold the internationally recognized human rights while also complying with the laws and regulations of the country or region in question.

4. Respecting Human Rights in Practice

1) Implementing human rights due diligence

We shall assess human rights risks in our business activities and take measures to prevent or mitigate any identified negative impacts.

2) Remedial measures

We establish a system that not only facilitates internal reporting but also enables external suppliers and business partners to report and consult on human rights. If it becomes clear that a negative impact on human rights has occurred or has been facilitated, we will strive to correct that impact by taking appropriate measures.

3) Dialogue

We shall engage in constructive dialogue and discussion with stakeholders whose human rights are being affected by our business activities in a timely manner and strive to fully grasp, improve, and resolve any issues.

4) Awareness-raising activities (education)

We shall conduct awareness-building activities to help our directors, officers and employees understand the human rights policy and take action in their respective operations based on this policy.

5) Information disclosure

We shall regularly disclose the progress of our initiatives for addressing any negative impacts on human rights.

5. Initiatives on Human Rights Issues (Specific Issues)

The HOYA Group recognizes the following human rights issues in relation to our business activities as particularly important social responsibilities and strives to improve and resolve them.

- 1) Prohibiting forced labor or child labor: Child labor, forced labor, and human trafficking within the HOYA Group or its supply chain is strictly forbidden.
- 2) Eliminating discrimination and harassment: We do not engage in unfair discriminatory treatment or harassment on the grounds of a person's race, nationality, gender, religion, creed, birth, age, mental or physical disability, sexual orientation, social status, or other factors.
- 3) Occupational health and safety: We strive to prevent accidents, disasters, and injuries in the workplace and ensure workplace safety.
- 4) Freedom of association and the right to collective bargaining: We respect workers' freedom of association and the right to collective bargaining to the extent permitted by the laws and regulations of individual countries and regions.
- 5) Working hours and wages: We comply with the laws and regulations relating to working hours and wages applicable in each country or region.
- 6) Right to privacy: We respect the right of individuals to protect their privacy and we treat all information used for legitimate business purposes with the utmost care.
- 7) Human rights issues in the supply chain: We are committed to responsible procurement because we recognize the importance of complying with laws and regulations and protecting human rights not only within the HOYA Group but across our supply chain.

6. Approval of the HOYG Group Human Rights Policy

This human rights policy has been approved by the Board of Directors of HOYA Corporation.

(Formulated October 27, 2022)