



HOYA Group – Modern Slavery Statement

The *Transparency in Supply Chains* clause in Section 54 of the UK Modern Slavery Act 2015 requires organisations over £36 million turnover and that carry out business in the UK, to produce an annual public statement on the steps they have taken to identify and eradicate slavery and human trafficking within their businesses and supply chains. The HOYA Group is committed to ensuring that its own company and business partners adhere to high ethical standards and comply with the laws and regulations applicable to their business, including laws relating to human trafficking and slavery. This document constitutes the HOYA Group's slavery and human trafficking statement for the financial year ending 31 March 2024.

The HOYA Group is a diversified, multinational company and leading supplier of innovative and indispensable high-tech and healthcare products. It is headquartered in Japan and is comprised of over 150 subsidiaries and affiliates with over 35,000 employees worldwide. HOYA's Life Care division supplies healthcare products such as eyeglasses and medical endoscopes. HOYA's Information Technology segment focuses on electronic products such as optical lenses for digital cameras and smartphones. Several UK-based subsidiaries manage sales of blanks, flexible medical endoscope reprocessors, spectacle lenses and flexible medical endoscopes.

Production of our advanced optics technologies takes place in our owned manufacturing sites, based predominantly in Asia, with products shipped to our customers in Europe, the Middle East, Africa and the Americas.

The HOYA Group is committed to delivering high standards of corporate governance and compliance, striving to employ the highest ethical and professional standards and to comply with the local laws and regulations applicable to its businesses. To support these efforts, the HOYA Group established the Headquarters Compliance Group under the HOYA Group Chief Compliance Officer (CCO), reorganizing the Hoya Group Compliance Organization so as to strengthen the compliance and oversight of all our business divisions.

All HOYA Group employees are required to confirm or renew their adherence to the HOYA Global Code of Conduct (CoC) every year, agreeing to promptly report any violations. The HOYA CoC outline the company's expectations for business conduct and practices and include provisions on conducting business with high ethical and legal standards. This includes employees respecting human rights and not accepting child labour, forced labour or human trafficking of any kind in our business and supply chains. HOYA aims to achieve its management principles, which contribute to economic prosperity, social progress and cultural advancement, through procurement activities which work to create and reinforce positive relationships with suppliers. This year, HOYA Group has achieved 98% participation, among all the Group companies, to the online training initiative of CoC.

In September 2021 the HOYA Board identified material focus areas of our Group ESG initiatives. One of the material areas prioritized is Supply Chain Management, which lies at the heart of Hoya's efforts to combat modern slavery and human trafficking.

We have continued our efforts to adopt better industry practices and protect workers' rights by ensuring all high and medium-risk suppliers of goods and services to Hoya to re-affirm their commitment to [the HOYA Supplier Code of Conduct \(SCOC\)](#) by signing an agreement to comply in their own business and supply chains. This includes suppliers not only of the products we sell, but also of the services we procure such as labour providers to our factories.

Our SCOC is provided in English, Japanese, Chinese, Thai, Vietnamese, the main languages spoken in our supply base. The SCOC contains provisions on forced labour and human trafficking, in addition to child labour, discrimination and freedom of association. Since 2018, compliance with the HOYA SCOC has been included as a contractual requirement in all newly adopted distributor and supplier contracts. In 2024, the HOYA SCOC has been updated to ensure that suppliers respect human rights, including the addition of a requirement for suppliers to establish and operate a system to comply with the HOYA SCOC. Compliance with HOYA SCOC stands in addition to the contractual requirement for suppliers and distributors to comply with all laws and regulations applicable to their business.

The HOYA Help Line and other resources remain available to employees, vendors, customers, or other stake holders and can be used to report suspected human rights violations, as outlined in the CoC and HOYA SCOC. The HOYA SCOC is supported by a dedicated team which manages reports of suspected violations and responds to supplier inquiries about compliance with the SCOC and remediation of any arising issues.

We continuously commit to our due diligence procedures for suppliers prior to engagement of a supplier, we evaluate a supplier's ability to meet the HOYA SCOC requirements, which may include suppliers' response to questionnaires and audits of supplier facilities. Our expectations for compliance with ethical and quality standards are continued to be communicated to all potential suppliers through the HOYA SCOC which requires a commitment to ensure that slavery and human trafficking are not taking place in their business and supply chains.

We retain the right to periodically conduct audits of suppliers to confirm compliance with supplier performance and quality standards as outlined in the HOYA SCOC. We are committed to working with suppliers to ensure the correct management systems are in place to prevent breaches or to cure any weaknesses identified.

In September 2022, [HOYA Group Human Rights Policy](#) was approved by the HOYA Board and implemented across HOYA Group. The Policy stipulates the prohibition of child labour, forced labour, and human trafficking as well as the adherence to international norms including the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

In addition, in 2023, in the effort of reassessing human rights risks in HOYA Group and its value chain, we conducted group wide survey and hearing from business divisions with advice from outside experts. We referred to external data on international compacts and guidelines related to human rights, industry attributes as well as results of hearings from business divisions to identify potential risk areas relating to human rights of the HOYA Group's business and our supply chain. Based on the results of the potential risk assessment, the HOYA Group will conduct to further risk assessment with suppliers through question and will continue to take precautions to ensure to mitigate such risks and if found, will take appropriate actions.

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Eiichiro Ikeda,

HOYA Group President and CEO on September 26, 2024