



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 2025.

1. Organisational Structure, Business, and Supply Chains

The HOYA Group is a diversified multinational company and a leading supplier of innovative and indispensable high-tech and healthcare products. Headquartered in Japan, the Group comprises over 150 subsidiaries and affiliates, employing more than 35,000 people worldwide. HOYA's Life Care business provide healthcare products such as eyeglasses and medical endoscopes. Its Information Technology segment focuses on electronic products, including optical lenses for digital cameras and smartphones. Several UK-based subsidiaries manage the sales of blanks, flexible medical endoscope reprocessors, spectacle lenses, and flexible medical endoscopes. The HOYA Group's total revenue was approximately JPY 866 billion for the financial year ending 31 March 2025.

Our advanced optics technologies are produced at HOYA-owned manufacturing sites, primarily located in Asia, with products shipped to customers across Europe, the Middle East, Africa, and the Americas. HOYA has been striving—and remains committed—to mapping suppliers across all tiers, including Tier 1 and those further downstream. While we are dedicated to this effort, we acknowledge that visibility beyond Tier 1 remains a challenge and an area for ongoing improvement.

The HOYA Group has established a governance framework to address compliance and business risks, including those related to modern slavery, across its operations and supply chains. Responsibility for identifying, assessing, and responding to modern slavery risks is shared across relevant divisions, which operate with a high degree of independence and maintain their own procurement, sustainability, and legal functions.

Senior-level oversight is provided by the Chief Compliance Officer (CCO), who consolidates information across the Group, reviews it, and regularly reports relevant risks to the Board of Directors. The CCO ensures that modern slavery risks are integrated into the Group's broader risk management and compliance systems.

2. Organisational Policies

In September 2022, the [HOYA Group Human Rights Policy](#) was approved by the Board of Directors and implemented across the entire Group. This policy is grounded in the HOYA Group's corporate mission and core management principles, and it outlines the Group's commitment to upholding human rights. It explicitly prohibits child labour, forced labour,

and human trafficking, and affirms adherence to international standards, including the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the Ten Principles of the United Nations Global Compact.

In addition, the [HOYA Global Code of Conduct](#) (CoC) sets forth the fundamental guidelines that all employees are expected to follow in the performance of their duties. The CoC emphasizes mutual respect and the protection of basic human rights, including the prohibition of child labour, forced labour, and human trafficking within our operations and throughout our supply chain. The CoC is available in 27 languages spoken across our global operations.

To further advance these principles, HOYA has established the [HOYA Supplier Code of Conduct](#) (SCOC) which promotes best industry practices and safeguards workers' rights.

The SCOC is publicly available on our website, ensuring transparency and accessibility for all stakeholders. The SCOC is available in English, Japanese, Chinese, Thai, and Vietnamese—languages commonly spoken across our supply base. It includes provisions on forced labour and human trafficking, as well as child labour, discrimination, and freedom of association. Since 2018, compliance with the SCOC has been a contractual requirement in all newly adopted distributor and supplier agreements in certain HOYA Group divisions.

In fiscal year 2024, reflecting the HOYA Group's growing commitment to human rights and its responsibility to prevent modern slavery—including child labour and forced labour—we updated the SCOC to reinforce these principles.

3. Assessing and Managing Risk

In 2023, as part of a reassessment of human rights risks across the HOYA Group and its value chain, we conducted a group-wide survey and held consultations with business divisions, supported by advice from external experts. This process involved referencing international human rights compacts and guidelines, identifying industry-specific risk factors, and gathering insights through internal hearings to pinpoint potential human rights risks within our operations and supply chain.

The HOYA Group faces modern slavery risks primarily in its supply chain, particularly in jurisdictions with limited labour protections.

For mitigating these risks, the procurement, sustainability, legal and compliance teams of certain divisions are responsible for conducting supplier risk assessments, and ensuring compliance with the SCOC collaboration with the Group's compliance team.

HOYA will begin reviewing high-risk suppliers using a negative media database and evaluating their practices against international standards, particularly where information related to modern slavery is available, supported by advanced IT tools.

In some divisions, prior to engaging a supplier, we evaluate their ability to meet the requirements of the SCOC. This may include responses to questionnaires and audits of supplier facilities.

All high- and medium-risk suppliers are required to reaffirm their commitment to the SCOC by signing an agreement to comply with its principles within their own operations and supply

chains. This requirement applies not only to product suppliers but also to service providers, such as labour agencies supporting our factories.

Based on the findings of this preliminary risk assessment, the HOYA Group plans to conduct further evaluations with suppliers through targeted questionnaires. We will continue to take precautionary measures to mitigate identified risks and, where necessary, take appropriate corrective actions.

4. Due Diligence in Relation to Modern Slavery

In October 2024, the HOYA Group formalised its commitment to group-wide due diligence by adopting [the HOYA Group Due Diligence Policy](#). This policy outlines the Group's responsibility to identify, prevent, and mitigate adverse human rights and environmental impacts across its operations and value chain. It establishes a risk-based approach, assigns oversight responsibilities to executive leadership and the Board of Directors, and aligns with international standards, including the OECD Guidelines for Multinational Enterprises. In accordance with this policy, we remain committed to our due diligence procedures.

The HOYA Help Line and other resources remain available to employees, vendors, customers, and other stakeholders, and can be used to report suspected human rights violations, as outlined in the CoC and the SCOC. Reports submitted through the Help Line are forwarded to the HOYA Group's Compliance team on a strictly confidential and anonymous basis, if the reporter so chooses. A dedicated team supports the SCOC by managing reports of suspected violations and responding to supplier inquiries regarding compliance and remediation.

In FY2024, no incidents of modern slavery were identified across the HOYA Group or its supply chains.

5. Training

HOYA provides mandatory annual training on the CoC, which includes topics such as the prohibition of modern slavery, conflict minerals, anti-corruption, and whistleblowing. This training is delivered online or through other appropriate formats to ensure easy access for all employees. In FY2024, the HOYA Group achieved a 99% participation rate in the CoC online training initiative across all Group companies. Additionally, several divisions have implemented their own initiatives to enhance employees' ethical awareness. These include:

- Ensuring the HOYA Code of Conduct is easily accessible to all employees through appropriate formats.
- Fostering a speak-up culture by conducting online training that introduces the HOYA Help Line and encourages open communication.
- Reinforcing ethical decision-making by incorporating real-world dilemmas into training programs and internal communications.
- Promoting ethical values by identifying and highlighting employee role models, such as ethics ambassadors, across departments.

HOYA also reaffirms suppliers' commitment to the updated SCOC by requiring them to sign an agreement to comply within their own operations and supply chains during onboarding or routine procurement processes. To date, more than 2,000 suppliers newly agreed to comply

with the updated Supplier Code of Conduct (SCOC), following proactive engagement by HOYA representatives. Through close communication, we provided detailed explanations of the intent and background of the SCOC, which helped deepen supplier understanding and led to their agreement.

6. Monitoring and Evaluation: Understanding and Demonstrating Effectiveness

Through supplier screening and the HOYA Help Line, we strive to identify risks related to modern slavery.

We reserve the right to conduct periodic audits of suppliers to verify compliance with the performance and quality standards outlined in the SCOC. These audits help assess how suppliers uphold human rights, including the elimination of forced labour and child labour.

Our goal is to ensure that no serious incidents of modern slavery occur within our own operations or across our supply chains. We remain committed to proactively identifying risks and working collaboratively with relevant suppliers to implement appropriate remediation measures.

池田 英一郎

Eiichiro Ikeda,

HOYA Group President and CEO on September 30, 2025