



## 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 2026.

### 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 947 billion for the financial year ending 31 March 2026.

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 suppliers 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. Information gathering within our own operations is supported through internal audits, employee engagement activities, and consultations with employee representatives where applicable. Progress in this area has been made possible through close collaboration among our internal audit, human resources, and compliance teams.

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, Vietnamese, Portuguese and Hungarian—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. In fiscal year 2025, we further enhanced the SCOC by explicitly prohibiting retaliation against individuals who report suspected violations of the SCOC in good faith. The HOYA Group will continue to review and update the SCOC based on the results of risk assessments conducted across its supply chain and evolving international expectations regarding responsible business conduct.

### **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.

To mitigate these risks, procurement, sustainability, legal, and compliance teams within relevant business divisions are responsible for conducting supplier risk assessments and promoting compliance with the SCOC, in collaboration with the Group Compliance function. 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 to the Help Line are handled on a strictly confidential basis and, where requested and legally permissible, may be handled anonymously.

In fiscal year 2025, an internal audit identified a potential risk of excessive overtime at manufacturing sites in Vietnam, which could increase the risk of situations associated with forced labour. In response, the site management and human resources team worked together to implement corrective measures, including (i) the development of a workforce expansion plan to alleviate excessive workloads and (ii) the introduction of a more accessible digital tool enabling employees to better monitor and manage their working hours. These measures were designed to strengthen working conditions and reduce the risk of excessive overtime. In addition, the HOYA Group began preparations for a broader assessment of potential human rights risks by conducting employee surveys across multiple countries and regions. The results will be used to support future updates to our human rights and modern slavery risk assessments.

#### **5. Training**

HOYA provides mandatory annual training on the CoC, which includes topics such as the prohibition of modern slavery, responsible sourcing, anti-corruption, and whistleblowing. This training is delivered online or through other appropriate formats to ensure easy access for all employees. In FY2025, the HOYA Group achieved a 99.5% 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 have agreed to comply with the updated 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, supplier assessments, internal audits, employee engagement activities, and the HOYA Help Line, we seek to identify and address potential risks related to modern slavery and human rights violations within our operations and supply chains. Internal audit activities support our efforts to assess compliance with the CoC and to evaluate how HOYA Group companies uphold human rights standards, including the prevention of forced labour, child labour, and other forms of labour exploitation.

In addition, supplier assessments and audits may be conducted to evaluate compliance with the requirements of the SCOC, including expectations relating to human rights, labour practices, business ethics, and responsible sourcing.

Information obtained through these activities, together with reports received through the HOYA Help Line, helps us evaluate the effectiveness of our policies, due diligence processes, and risk mitigation measures.

Our goal is to prevent and address modern slavery risks within our own operations and across our supply chains. We remain committed to strengthening our ability to identify, assess and mitigate such risks, and to working collaboratively with relevant suppliers and other stakeholders to implement appropriate corrective and remediation measures where necessary.



Eiichiro Ikeda,

HOYA Group President and CEO on September 30, 2026