HOYA Supplier Code of Conduct

Preface

The HOYA Group (hereinafter referred to as "HOYA") has established this HOYA Supplier Code of Conduct (the “Code”) as a guide for its interactions with suppliers of goods or services, including but not limited to suppliers, vendors, contractors, consultants and agents (hereinafter referred to as “Business Partner(s)”), who do business with HOYA’s worldwide entities.

I. Introduction

This Code is modeled on internationally recognized standards, including the following:
- UN Guiding Principles on Business and Human Rights
- United Nations Universal Declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Basic Convention (ILO Convention Nos. 87, 98, 29, 105,138, 182, 100, 111, 155, and 187)
- OECD Guidelines for Multinational Enterprises

This Code is reviewed regularly with relevant stakeholders and revised as necessary. The latest version of this Code is available from the Supply Chain Management section of HOYA's website.

II. Labor

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

1. Prohibition of Forced Labor

   Business Partner shall not engage in forced, indebted labor, or experienced labor, involuntary prison labor, slavery, or human trafficking. HOYA does not allow any form of child labor, forced labor, or trafficking. We also respect individual human rights and do not trade with supply chains that engage in any form of child labor, forced labor, or trafficking. Business Partner is responsible for ensuring that its business and supply chain are free of slavery and trafficking.
   In addition, as part of the employment process, Business Partner shall provide an employment contract written in the native language (or in a way that is clearly understandable to the workers).

   Business Partner shall not retain, destroy, conceal, or confiscate government-issued identification cards, passports, work permits, etc. of workers, including foreign immigrant workers. Also, Business Partner shall not allow agents and contractors involved in the employment of workers, including foreign migrant workers, to retain, destroy, conceal, or confiscate government-issued identification documents, passports, or work permits.

2. Child Labor and Young Workers

   Business Partner shall not allow child labor at any stage of the manufacturing process. The term “child” refers to any person under the age of 15, under the age of completing compulsory education, or under the minimum age for employment in the country, whichever one is higher. The use of legitimate workplace learning programs, which comply with all laws and regulations, is encouraged.

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. Business Partner 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. Business Partner 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 relating to minimum wages, overtime hours, and legally mandated benefits.

Working hours per week shall not exceed the upper limit set by local laws. However, in an emergency or exceptional situation, the limit may be exceeded to the extent permitted by local laws.

Business Partner shall accept all applicable laws regarding parental leave, family care leave, and paid leave, and shall not tolerate any discrimination or harassment regarding pregnancy, childbirth, childcare leave, or family care leave.

4. Humane Treatment and Non-Discrimination

Business Partner shall not engage in or tolerate any form of inhumane treatment such as psychological abuse (psychological violence against others through inhumane language, harassment, neglect, or damaging self-esteem), physical abuse, harassment (harassment due to race, nationality, gender, religion, creed, birth, age, physical or mental disability, sexual orientation, or other legal requirements), or threats of such treatment.

5. Freedom of Association and Collective Bargaining

Business Partner must respect and comply with all laws that recognize the right of workers to form and join or not join trade unions of their own choosing and bargain collectively.

Business Partner shall also respect the right of their employees or their representatives to openly exchange views and share concerns with the management regarding working conditions and business practices without fear of discrimination, retaliation, intimidation, or harassment.

III. Health and Safety

Business Partner has an obligation to minimize the occurrence of work-related injury and illness. To fulfill this obligation, the following health and safety standards shall be applied:

1. Occupational Safety

Business Partner shall ensure that workers are not exposed to safety hazards through appropriate design and work process. When these measures are not enough to control the risks, workers are to be provided with appropriate personal protective equipment.
Machineries shall be evaluated for safety hazards and if such hazards exist, shall be managed as described above.

2. Occupational Injury or Illness

In the event of occupational injuries or illnesses, an investigation will be carried out, corrective measures will be implemented to minimize the causes, and procedures will be established to manage occupational injuries and illnesses, including provisions to facilitate the return of workers.

3. Industrial Hygiene

Worker exposure to chemical, physical, and biological agents shall be identified and assessed, and countermeasures shall be taken through engineering or administrative measures. When these measures are not enough to control the risks, workers are to be provided with appropriate personal protective equipment.

4. Emergency Measures

   Business Partner shall identify and assess potential emergencies. They should implement emergency plans and response procedures, such as the use of appropriate fire detectors, fire extinguishing systems, evacuation procedures, and evacuation facilities, in order to minimize their impact.

5. Physically Demanding Task

   Physically demanding tasks (not only hard work, but also repetitive work such as assembling and entering data for long hours, continuous work, etc.) shall be identified and appropriately managed so as not to lead to accidents and diseases.

6. Safety Measures for Machines

   Machineries shall be evaluated for safety hazards and if they pose a hazard to workers, safety measures shall be taken and maintained appropriately.

7. Sanitary Facilities, Diet, and Housing

   Business Partner shall provide their employees with access to clean toilet facilities, potable water, and facilities for preparing, storing, and eating hygienic foods.

8. Training

   Business Partner shall conduct appropriate safety and health training for their employees at the workplace. This includes using personal protective equipment (if applicable) and training for emergencies.

9. Health Care of Workers

   Business Partner shall take appropriate measures such as health checkups, disease prevention, and mental health measures to maintain the physical and mental health of their employees.

IV. Environment

Environmental protection is a global concern. We operate our business in a safe and environmentally responsible manner, and we expect Business Partner to do so as well.

1. Environmental Permits

   All required environmental permits (e.g., emission monitoring), approvals, and registrations must be obtained and kept current at all times to comply with operational and reporting requirements.

   In addition, if Business Partner receives additional materials from HOYA, such as environmental rules, regulations, and policies, Business Partner shall strictly comply with those regulations as well.

2. Waste and Resource Protection

   By complying with laws and regulations related to the use of waste and resources and conducting appropriate management, Business Partner shall promote the reduction, reuse, and recycling of resources and minimize the generation of waste.

3. Hazardous Substance

   Chemical substances specified by laws and regulations of the host country shall be controlled in the manufacturing process.

4. Emissions into the Atmosphere

   Business Partner shall comply with laws and regulations related to air pollution and take appropriate measures to reduce the emission of harmful substances from their business activities into the air.

5. Material Restrictions

   Business Partner shall comply with all applicable laws, regulations, and HOYA requirements concerning the prohibition or restriction of certain substances in our products and manufacturing, including labeling for recycling and disposal.

6. Water Management

   Business Partner shall comply with laws and regulations related to water management and monitor the source, usage, and discharge of the water used, and strive to conserve water.

   All wastewaters shall be characterized, monitored, controlled, and treated as necessary prior to discharge or disposal.

   In addition, Business Partner shall identify pollution sources that may cause water pollution and manage appropriately.

7. Energy Consumption and Greenhouse Gas Emissions

   Business Partner shall strive to continuously improve energy efficiency in their business activities and increase the consumption of renewable energy.

   In addition, Business Partner shall set targets for the reduction of greenhouse gas emissions, measure and calculate the amount of greenhouse gas emissions, and report or disclose their progress to HOYA.

8. Biodiversity

   Business Partner shall respect the guidelines on biodiversity set by the host country and strive to minimize the impact.

V. Ethics and Business Governance

We look to Business Partner to comply with all applicable anti-bribery and anti-corruption laws and regulations, and to uphold high ethical standards. HOYA places particular emphasis on compliance with laws, regulations, and standards in the following areas:

1. Anti-Corruption/ Gifts/ Entertainment

   Business Partner shall fully comply with all applicable anti-corruption and anti-bribery laws, including the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, in all transactions with all business partners.

   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 cases where HOYA has reasons to believe that Business Partner is not complying with any of the rules mentioned above, to the extent permitted by law, HOYA is entitled to withhold any payment due them, and/or terminate the business relationship with immediate effect. HOYA is not liable to such Business Partner for any loss or damage related to HOYA’s decision to exercise its rights under this provision.

   Business Partner shall offer and accept any gifts and entertainment to or by its suppliers and/or governmental officials only within the scope of the applicable rules. HOYA expects Business Partners to be aware of and comply with all rules that may apply to such activities, including laws and regulations that have extraterritorial effect. .

2. Prevention of Money Laundering/Terrorist Financing

   Business Partner shall implement appropriate measures to prevent money laundering and terrorist financing in all

transactions with all counterparties, and shall prevent the use of money from such transactions for money laundering purposes.

3. Disclosure of Information

All transactions shall be conducted in a transparent manner and accurately reflected in the books and records. Information regarding labor, health and safety, environmental practices, business activities, organizational structure, financial position, supply chain and performance shall be disclosed to its suppliers and stakeholders within its value chains in accordance with applicable regulations and common industry practices. Falsification of records, misrepresentation of conditions, or practices in the supply chain are not tolerated.

4. Intellectual Property

Business Partner shall respect intellectual property rights, technologies, and know-hows in a manner that protects intellectual property rights and protects the information of their customers and suppliers.

5. Fair Business, Advertising and Competition

Business Partner shall not engage in or tolerate any form of extortion or embezzlement. They shall also comply with all applicable rules and standards for fair business, advertising, and competition.

In addition, Business Partner shall ensure appropriate prices by providing products, parts and raw materials at highly competitive prices and by continuing price reduction activities.

6. Protecting Identities and Prohibiting Retaliation

Unless prohibited by law, Business Partner shall ensure the confidentiality, anonymity, and protection of their employees and their whistleblowers. They shall also establish and communicate a channel through which whistleblowers can raise their concerns without fear of retaliation.

7. Responsible Mineral Procurement

Business Partners shall maintain policies and processes to identify, assess, and manage risks associated with gold, tantalum, tin, tungsten, cobalt, and mica, where such minerals are used in HOYA’s products. Such risks include, but are not limited to, financing of armed groups, human rights abuses, environmental harm, and other adverse impacts associated with conflict-affected and high-risk areas (CAHRAs).

Business Partners shall implement measures to prevent or mitigate such adverse impacts and shall maintain records and supporting evidence demonstrating the implementation of such measures and the effectiveness of their efforts.

Upon HOYA's request, Business Partners shall disclose information regarding their responsible mineral sourcing activities, including the measures taken, the results of such activities, and any relevant supporting documentation.

8. International Peace and Security

The international community regulates exports under various treaties and agreements to prevent arms from reaching groups that pose security concerns. Certain technologies and products can be used to make weapons as well as peaceful products. Therefore, its exports are strictly regulated. Business Partner shall comply with all export control laws applicable to their products and geographic regions. They shall also provide all the information and documents required to meet the export control requirements without delay.

9. Antisocial Forces/ Organized Crime
An antisocial force is a person who falls under any of the following:

a) An organized crime group, a member of an organized crime group, someone with an association with an organized crime group, or a person equivalent thereto, regardless of the form of organization or legal form, or

b) A person who makes violent demands, unreasonable demands beyond legal rights, fraud, or other equivalent acts, either personally or through a third party.

Business Partner warrants and represents that it does not fall under the definition of antisocial forces as described

above. Business Partner shall guarantee to HOYA that they will not engage, either directly or through third parties, in any of the following acts:
(1) violent demands
(2) unreasonable demands beyond legal liability
(3) the act of using threatening words or behavior or violence in relation to a transaction
(4) the act of spreading unfounded rumors, damaging the reputation of the counterparty by using fraudulent means or force, or obstructing the business of the counterparty
(5) other acts equivalent to those in the preceding items

Notwithstanding any other applicable legal remedies, HOYA is entitled to terminate any agreement with Business Partner who does not operate in accordance with this section 9. HOYA is not liable to such Business Partner for any loss or damage arising from the exercise of its rights under this provision.

VI. Quality and Safety

Business Partner must ensure the quality and safety of their products and fulfill its responsibilities as a supplier. Business Partner is expected to:

1. Insure Product Safety

   Business Partner shall design, manufacture, and sell products on the assumption that they meet the safety standards set forth by the laws and regulations of each country, and shall develop an implementation system for that.

2. Quality Control

   Business Partner shall establish a system to take corrective measures if any matter is pointed out regarding quality or safety.

3. Provide Accurate Product and Service Information

   Business Partner shall provide appropriate information regarding products and services.

VII. Information Security

Cyber-attacks and information leaks are serious risks in business operations. Business Partner must ensure information security and implement the following measures:

1. Defend Against Cyber Attacks

   Business Partner shall take protective measures against threats to its computer network and manage them so as not to harm itself or others.

2. Protect Personal Information

   HOYA strictly complies with all applicable personal information protection laws regardless of the country or region in which it operates. Business Partner must respect the privacy of its employees. All employees' or third parties' personal information that HOYA collects and provides to Business Partner is carefully handled, protected, and used appropriately.

3. Prevent of Leakage of Confidential Information

   Technical information is extremely important for HOYA to maintain our competitiveness and we must prevent leaks. This also applies to sensitive information about new inventions and co-developed products.
   Business Partner shall establish and operate a system to appropriately manage and protect not only its own confidential information but also such confidential information received from customers and third parties.

VIII. Management System

Business Partner shall introduce or establish a management system to the extent related to the content of this Code. The management system must include the following elements:

1. Corporate Commitment

   Based on this Code, Business Partner shall express its commitment to human rights, occupational health and safety, the environment, ethics, and make efforts for continuous improvement, and approved by management.

   In addition, this assertion is accessible from the outside and shall be deployed in multiple languages so that employees can understand it.

2. Management's Accountability and Responsibility

   Business Partner shall clearly identify the management and responsible personnel within the company who will oversee compliance and implementation of applicable laws, regulations, and this Code in regard to products and services.

   Management shall also review the management system on a regular basis.

3. Legal and Customer Requirements

   Business Partner shall develop a process to identify, monitor, and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

4. Risk Assessment and Risk Management

   Business Partner shall establish and continuously operate a process for identifying risks in compliance with laws and regulations related to the business and this Code. The importance of identified risks shall be assessed and managed.

5. Improvement Goal

   Improvement targets and targets related to compliance with laws and regulations and this Code shall be stipulated, an implementation plan for achieving the targets shall be formulated, and performance shall be periodically evaluated.

6. Training

   To implement the operation plan for achieving the above improvement goals and to meet the requirements of applicable laws and regulations, a program for educating managers and workers shall be established.

7. Communication

   Business Partner shall establish and continue to operate a process for communicating clear and accurate information about compliance with laws and regulations, human rights, environmental and ethical policies, activities and performance to their employees, suppliers and customers.

8. Worker/ Stakeholder Engagement and Access to Remedies

   Business Partner shall establish a system for receiving complaints and violation reports from its employees and its suppliers regarding the acts and conditions covered by this Code, protect the whistleblower from retaliation, and establish a process for appropriately responding to the contents of the reports.

9. Assessment and Audit

   Business Partner shall conduct periodic self-evaluations to confirm compliance with laws, regulations, this Code, and contract requirements with HOYA.

In addition, Business Partner shall be subject to audits by HOYA or its representative on a periodic or as-needed basis in accordance with this Code.

10. Corrective Action Process

Processes shall be established to remedy risks identified by internal or external assessments, inspections, investigations, and reviews.

Unless otherwise provided in this Code, in the event of a material breach of this code, HOYA may request corrective action to the Business Partner and, if the material breach is not remedied, HOYA may consider whether to continue doing business with the Business Partner.

11. Documentation and Records

Business Partner shall create and maintain documents and records to ensure compliance with regulations and corporate requirements, as well as appropriate confidentiality to protect privacy.

12. Supply Chain

Business Partner shall establish a process to communicate the requirements of this Code to its suppliers and monitor their compliance.

IX. Questions and Reporting

Business Partner shall direct any questions on this code to their direct contact at HOYA or supplierconduct@hoya.com. Violations of this Code can be reported to the HOYA Helpline, available at www.hoyahelpline.com. HOYA will investigate any reported violations while making reasonable efforts to maintain the confidentiality of information relating to the identity of the person who reports a violation of this Code, except where disclosure is legally required. HOYA prohibits any retaliatory actions against individuals who report issues in good faith.

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