HOYA

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.

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 endoscope reprocessors, optical lenses and flexible 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.

All HOYA Group employees are required to adhere to the HOYA Business Conduct Guidelines (BCGs) and sign an affirmation form every year, agreeing to promptly report any violations. The HOYA BCGs 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 labor, forced labor 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.

As part of our continuing efforts to adopt better industry practices and protect workers' rights, earlier this year we adopted the HOYA Supplier Code of Conduct (SCOC) and published it in 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. All our direct, high and medium-risk suppliers are required to sign an agreement to comply with the SCOC 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 cleaning and canteen services and labor providers to our factories. Compliance with the HOYA SCOC is now included as a contractual requirement in all newly adopted distributor and supplier contracts. 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.

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 also

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. We are developing plans to strengthen our due diligence processes further, by identifying high-risk areas of our business and supply chains and putting in place the appropriate prevention and remediation systems with support from experts and local partners.

The HOYA Help Line and other resources are available to all employees and can be used to report suspected human rights violations, as outlined in the BCGs. 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.

Hiroshi Suzuki

HOYA Group President and CEO on September 18, 2018