

**Corporate Human Rights Benchmark
2019 Company Scoresheet**

Company Name HOYA Corporation
Industry ICT (Own operations and Supply Chain)
Overall Score (*) 7.2 out of 100

Theme Score	Out of	For Theme
0.8	10	A. Governance and Policies
2.0	25	B. Embedding Respect and Human Rights Due Diligence
1.3	15	C. Remedies and Grievance Mechanisms
1.0	20	D. Performance: Company Human Rights Practices
1.4	20	E. Performance: Responses to Serious Allegations
0.7	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The company states that "we respect fundamental human rights, and, in all our corporate activities, work to eliminate discrimination and harassment for any reason, including race, nationality, gender, religion, faith, birthplace, age, and mental or physical disability." [Annual Report, 2018: hoya.com & Sustainability: hoya.com] • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: ILO Core: Although the Company does not explicitly mention ILO, HOYA states in its Code of Conduct that is committed to not work with child and forced labour and will not discriminate or harass. However, there is no mention to respect the right to collective bargaining and freedom of association. [Hoya Business Conduct Guidelines, 17/1/31: hoya.com] • Not met: UNGC principles 3-6 • Met: Explicitly list ALL four ILO for ICT suppliers: HOYA explicitly lists all human rights that ILO has declared to be fundamental rights at work. In its Supplier Code of Conduct the Company states that do not accept child and forced labor, Suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>shall conform with and respect all laws which confer to workers the right to form and join trade unions of their own choosing, to bargain collectively as well as to refrain from joining associations and supplier shall not use or tolerate any harsh or inhumane treatment or the threat of such treatment. [Supplier Code of Conduct, March, 2018: hoya.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core • Met: Respect H&S of workers: The Company has an EHS Philosophy in which is described the occupational safety and health activities being performed within the HOYA Group companies. [EHS Philosophy, 3/5/19: hoya.com] • Met: H&S applies to ICT suppliers: HOYA discloses in its Supplier Code of Conduct that suppliers should commit to the task of minimizing the incidence of work-related injury and illness, to that end health and safety standards about occupational safety, occupational Injury and Illness, industrial hygiene, emergency preparedness and training shall apply. [Supplier Code of Conduct, March, 2018: hoya.com] • Not met: working hours for workers: The Company states that will accurately record our hours of work and will not work unpaid overtime nor let others do so. However, there is no evidence that there is a limit of maximum working hours per week. [Hoya Business Conduct Guidelines, 17/1/31: hoya.com] • Not met: Working hours for ICT suppliers: Hoya Corporation states for its suppliers that "work weeks are not to exceed the maximum set by local law, except in emergency or unusual situations to the extent permitted by local law". However, the Company does not disclose about maximum working hours or resting periods, to only respect local law is not enough evidence that Company and suppliers follow international standards on working hours. [Supplier Code of Conduct, March, 2018: hoya.com]
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Responsible mineral sourcing in conflict areas • Not met: Based on OECD Guidance • Not met: Requires responsible mineral sourcing from suppliers: The Company states in its supplier code of conduct that "Suppliers shall have a policy to reasonably assure that the columbite-tantalite (coltan), cassiterite, gold, wolframite, any of their derivatives, including but not limited to tantalum, tin, and tungsten, or any other mineral as defined as conflict mineral in the products, parts, components, and materials they manufacture does not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country". However, it is not clear if the commitment is extended to high risk areas beyond DRC and adjoining countries and if it follows the OECD Guidance. [Supplier Code of Conduct, March, 2018: hoya.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals • Not met: Suppliers expected to make similar requirements of their suppliers: See above. [Supplier Code of Conduct, March, 2018: hoya.com]
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement • Not met: Regular stakeholder engagement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects ICT suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: CEO or Board approves policy • Not met: Board level responsibility for HRs <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Incentives for at least one board member • Not met: At least one key ICT HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions • Not met: Senior responsibility for HR <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for ICT in supply chain
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key ICT HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions • Not met: Communicates its policy to all workers in own operations: The Company discloses that "in day-to-day operations, all basic Group policies will be expressed by the prompt transmission of vital information and smooth communication". However, it is not clear the company's processes to communicate its polices. [Hoya Business Conduct Guidelines, 17/1/31: hoya.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions for suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
	of policy commitment(s) to business relationships		<ul style="list-style-type: none"> • Not met: Communicating policy down the whole ICT supply chain • Met: Requiring ICT suppliers to communicate policy down the chain: Hoya discloses that at a minimum, Suppliers must also require their next tier suppliers to acknowledge and implement the Supplier Code of Conduct. [Supplier Code of Conduct, March, 2018: hoya.com] Score 2 <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company states that all Suppliers who do business with Hoya's worldwide entities must comply with Supplier Code of Conduct, in which is described the human rights commitments. [Supplier Code of Conduct, March, 2018: hoya.com] • Not met: Including on ICT suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments • Not met: Trains relevant ICT managers including procurement Score 2 <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments • Not met: Monitoring ICT suppliers Score 2 <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of ICT supply chain monitored
B.1.7	Engaging business relationships	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR affects ICT selection of suppliers: The company indicates "Compliance with the Hoya SCOC is now included as a contractual requirement in all newly adopted distributor and supplier contracts...Prior to the 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." Additionally Hoya discloses that if there is reason to believe in good faith that Suppliers do not comply with any of the rules described in Supplier Code of Conduct, to the extent permitted by law, Hoya shall be entitled to withhold any payment due to such Suppliers, and/or terminate the business relationship with immediate effect. [2018 Modern Slavery Statement, 2019: hoya.com] • Met: HR affects on-going ICT supplier relationships: Hoya discloses that if there is reason to believe in good faith that Suppliers do not comply with any of the rules described in Supplier Code of Conduct, to the extent permitted by law, Hoya shall be entitled to withhold any payment due to such Suppliers, and/or terminate the business relationship with immediate effect. [Supplier Code of Conduct, March, 2018: hoya.com] Score 2 <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with ICT suppliers to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: Workers in ICT SC engaged • Not met: Communities in the ICT SC engaged Score 2 <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: Identifying risks in ICT suppliers Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in ICT supply chain • Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including ICT suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: HOYA Corporation states that has a Help Line, that works as an internal reporting and consultation system for the Group. "If there is an act that contravenes the law or the HOYA Business Conduct Guidelines, the HOYA Help Line is intended to enable early identification of the problem and quick reporting to top management, while protecting the informer, which enables timely and appropriate action to be taken on the issue". [Compliance, 3/5/19: hoya.co.jp] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Channel is available in all appropriate languages: The Company discloses that "the system is in place at Group companies in Japan, North America (the United States and Canada), Thailand, European countries, Philippines, Singapore, Australia, Malaysia and Korea". In addition Hoya states that continue to expand the number of countries covered, giving the HOYA Help Line worldwide coverage. However, there is no evidence that the helpline is available in all the countries that the Company operates and all appropriate languages. [Compliance, 3/5/19: hoya.co.jp] • Not met: Expect ICT supplier to have equivalent grievance systems • Not met: Opens own system to ICT supplier workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Grievance mechanism for community <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: ICT suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales: HOYA discloses that the Help Line is intended to enable early identification of some problem and quick reporting to top management, while protecting the informer, which enables timely and appropriate action to be taken on the issue. However, there is no evidence about the timescales for addressing the complaints. [Compliance, 3/5/19: hoya.co.jp] • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: On its website in compliance section the Company states that the Help Line is intended to enable early identification of some problem and quick reporting to top management. However, there is no description about how the complaints may be escalated to more senior levels or independent parties. [Compliance, 3/5/19: hoya.co.jp]
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation: In its Code of Conduct the Company states that "It is strictly forbidden to treat someone adversely for consulting or providing information to the HOYA Help Line". However, Hoya does not explicitly states that its help line is opened also for external stakeholders. [Hoya Business Conduct Guidelines, 17/1/31: hoya.com] • Met: Practical measures to prevent retaliation: On its website Hoya discloses that "the system is designed to preserve anonymity and the company works to maintain the system's functional effectiveness". [Compliance, 3/5/19: hoya.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects ICT suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks

Indicator Code	Indicator name	Score (out of 2)	Explanation
	incorporating lessons learned		Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Achieved payment of living wage • Not met: Regularly review definition of living wage with unions
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why
D.4.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Does not use child labour: In its Code of Conduct the Company states that do not accept child labor. [Hoya Business Conduct Guidelines, 17/1/31: hoya.com] • Not met: Age verification of job applicants and workers Score 2 <ul style="list-style-type: none"> • Not met: Remediation if children identified
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Child Labour rules in codes or contracts: In its Supplier Code of Conduct, the Company states that suppliers shall not allow child labor in any stage of manufacturing. [Supplier Code of Conduct, March, 2018: hoya.com] • Not met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.4.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Pays workers in full and on time • Not met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Debt and fees rules in codes or contracts • Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Does not retain documents or restrict movement Score 2 <ul style="list-style-type: none"> • Not met: How sure about agencies or brokers
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Free movement rules in codes or contracts: Although the Company states in its Supplier Code of Conduct that "forced, bonded or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used"[...]" will not conduct business with supply chains which engage in any form of child labor, forced labor, or human trafficking", there is no evidence that the Company forbids retention of personal documents. [Supplier Code of Conduct, March, 2018: hoya.com] Score 2 <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation • Not met: Discloses % covered by collective bargaining Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: In its Supplier Code of Conduct the Company states that "suppliers shall conform with and respect all laws which confer to workers the right to form and join trade unions of their own choosing, to bargain collectively as well as to refrain from joining associations". However, CHRB could not find evidence about prohibition of retaliation against union members. [Supplier Code of Conduct, March, 2018: hoya.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on FoA and CB • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company discloses on its website that "in 2018, total number of occupational accidents occurred at all HOYA group facilities was 168 including 77 accidents resulted in leave from work". [Occupational Accidents at HOYA Facilities, 3/5/19: hoya.co.jp] • Not met: Lost days or near miss disclosure • Not met: Fatalities disclosures • Not met: Occupational disease rates Score 2 <ul style="list-style-type: none"> • Not met: Set targets for H&S performance • Not met: Met targets or explains why not

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: In its Supplier Code of Conduct the Company sets out clear the health and safety requirements that suppliers must follow. [Supplier Code of Conduct, March, 2018: hoya.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures • Not met: Occupational disease rates Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to stop harassment and violence: The Company discloses that is committed to "not discriminate against or harass (do harassment to) others on the basis of race, nationality, sex, religion, creed, birth, age, physical or mental disability, and sexual orientation". However, there is no description about its processes to stop harassment and violence against women. [Hoya Business Conduct Guidelines, 17/1/31: hoya.com] • Not met: Working conditions take account of gender • Not met: Equality of opportunity at all levels: The Company discloses on its website that work to achieve fair employment opportunities and benefits for both genders. In addition, states that the number of women on management increased. However, there is no description about Hoya's proactive actions to improve equality of opportunity at all levels. [Respecting Human rights, 3/5/19: hoya.com] Score 2 <ul style="list-style-type: none"> • Not met: Meets all of the requirements under score 1
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.4.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Respects max hours, min breaks and rest periods in its own operations Score 2 <ul style="list-style-type: none"> • Not met: How it implements and checks this
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Working hours in codes or contracts • Not met: How working with suppliers on working hours Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Responsible mineral sourcing due diligence in supplier contracts • Not met: Builds capacity with smelters/refiners Score 2 <ul style="list-style-type: none"> • Not met: Disclosure of smelter information in supplier requirements • Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Risk identification and disclosure in line with OECD Guidance • Not met: Identification of smelter/refiners and OECD due diligence Score 2 <ul style="list-style-type: none"> • Not met: Discloses smelters/refiners judged in line with OECD due diligence • Not met: Responsible conflict mineral sourcing covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes mineral risk management plan for supply chain • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time Score 2 <ul style="list-style-type: none"> • Not met: Supplier and stakeholders engaged in risk management strategy • Not met: Responsible conflict mineral sourcing covers all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 5.77 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.44 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.69 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, HOYA Corporation made data public that met one or more elements of the methodology in 9 cases, leading to a disclosure score of 0.69 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Not met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	HOYA Corporation met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.4.1.a: Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.4.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.