

# Hoya Corp.

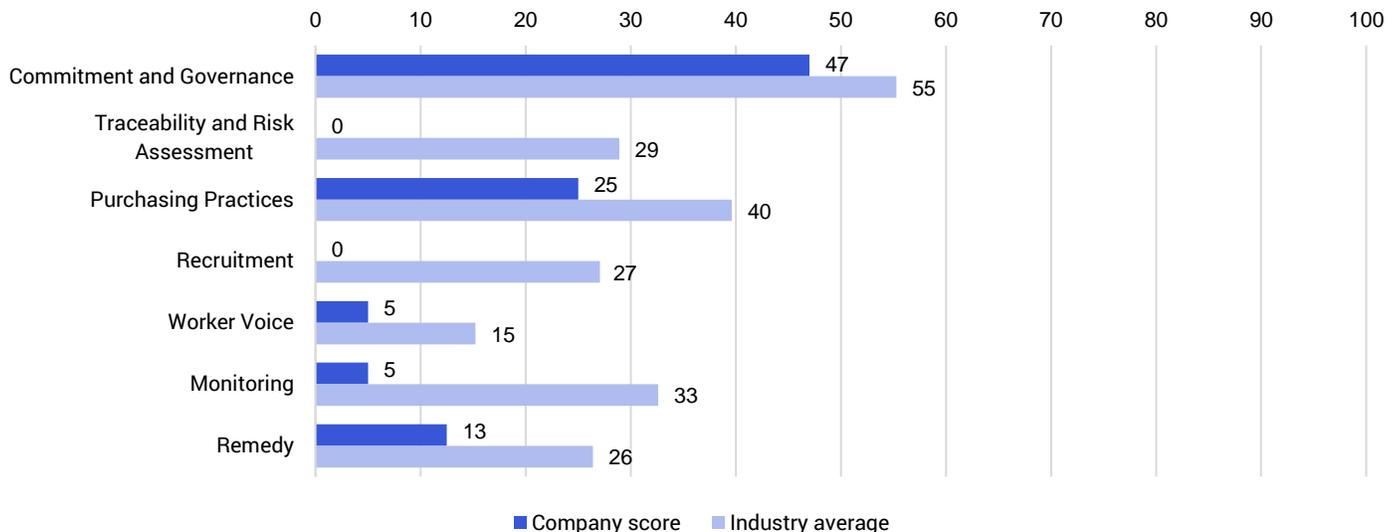
**TICKER**  
 TSE:7741

**MARKET CAPITALIZATION**  
 US\$19 billion

**HEADQUARTERS**  
 Japan

**COMPLIANCE**
UK Modern Slavery Act: [Disclosure available, but not compliant](#)
California Transparency in Supply Chains Act: [Not applicable](#)
**COMMITMENTS**
[Yes](#)
**OVERALL RANKING**
**30 out of 40**
**OVERALL SCORE**
**14 out of 100**
**SUMMARY**

Hoya Corp. (Hoya), an electronic components manufacturer, ranks 30th out of 40 companies, disclosing less information on its forced labor policies and practices than its peers. It has some disclosures and practices on the themes of commitment and governance, purchasing practices, worker voice, monitoring, and remedy. Notably, the company discloses commitments to strengthen internal trainings, communicating its supplier code to suppliers, and integrating the code into supplier contracts. Additional steps the company could take to address forced labor risks in its supply chains include disclosing policies and practices on the themes of traceability and risk assessment, as well as recruitment. Further, the company may consider providing supplier training and engaging relevant stakeholders on forced labor.

**THEME LEVEL SCORES**


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## LEADING PRACTICES

None

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## NOTABLE FINDINGS

**Commitment and Governance:** Hoya discloses a Supplier Code of Conduct which covers forced labor, child labor, non-discrimination, and freedom of association. This code has been approved by the chief legal officer and the CEO and is easily accessible from the company's website. The company states that it has a committee in place which is responsible for implementing its Supplier Code of Conduct, and that it trains supply chain and procurement officers on this code.

**Cascading Standards Through the Supply Chain:** Hoya's Supplier Code notes that "as a minimum, Suppliers must also require their next tier suppliers to acknowledge and implement this Code".

**Remedy:** Hoya's Supplier Code of Conduct includes an email address which allows stakeholders to submit concerns regarding violations of the code. It states that reported violations of this code will be dealt with by the same Committee which is responsible for implementing the code which will work with relevant business divisions to respond appropriately.

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## OPPORTUNITIES FOR IMPROVEMENT

**Commitment and Governance:** The company may consider establishing training programs to ensure that relevant decision-makers within its supply chains are aware of the risks related to human trafficking and forced labor and effectively implement the company's policies and standards. The company is encouraged to engage with relevant stakeholders on human trafficking and forced labor. This includes engaging with policy makers, worker rights organizations, or local NGOs in countries in which its suppliers operate, as well as actively participating in one or more relevant multi-stakeholder or industry initiatives.

**Traceability and Risk Assessment:** To demonstrate a strong understanding of its supply chains, the company may consider disclosing the names and addresses of first-tier suppliers, the countries of below-first-tier suppliers, the sourcing countries of raw materials at high risk of forced labor, and information on its suppliers' workforce. The company is further encouraged to assess forced labor risks across its supply chains and disclose the risks identified. Notably, the company disclosed several commitments to improve its practices.

**Recruitment:** To address the risk of exploitation of migrant workers through recruitment agencies in its supply chains, the company may consider requiring recruitment agencies used by its suppliers to uphold workers' rights and ensuring that workers in its supply chains are not charged fees during any recruitment-related process. The company is also encouraged to ensure recruitment agencies used by its suppliers are audited, and to work with suppliers to guarantee migrant workers' rights are respected (e.g., to ensure workers' passports or other personal documents are not retained).

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## COMPANY PROVIDED ADDITIONAL DISCLOSURE

[Yes](#)