

# VENDOR CODE OF CONDUCT



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## **INTRODUCTION**

HHOYA is committed to conducting business with the highest ethical standards and we select and treat our business partners honestly, fairly and objectively.

As a condition to doing business with HHOYA, suppliers and other providers of goods and services ('Vendors') who conduct business with HHOYA must comply with all applicable laws and regulations and act in accordance with the same ethical principles under which HHOYA operates. While we recognize that there are different legal and cultural environments in which Vendors operate throughout the world, we have established this Vendor Code of Conducts ("Vendor Code") to set forth these principles and the basic requirements a Vendor must meet to maintain a business relationship with HHOYA.

These standards are not only aligned with legal requirements but also reflect HHOYA's values of integrity, respect, and sustainability.

## **COMPLIANCE WITH LAWS AND REGULATIONS**

Vendors must comply with all applicable laws, regulations, and industry standards in every jurisdiction where they operate. This includes adherence to local, national, and international laws governing their operations, products, and services. Where conflicts arise between this Code and applicable laws, Vendors must apply the stricter standard.

## **ETHICAL BUSINESS PRACTICES**

Vendors are expected to conduct their business with integrity and transparency. They must avoid any form of unethical behavior, including fraud, misrepresentation, and unfair business practices. All transactions should be accurately and honestly recorded.

## **ANTI-BRIBERY AND CORRUPTION**

HHOYA maintains a zero-tolerance policy towards bribery and corruption. Vendors must not engage in any form of bribery, whether direct or indirect, and must comply with all applicable anti-bribery and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Vendor must not give, agree to give, offer or receive, directly or indirectly, anything of value including payments, gifts or favors to influence the behavior of another business partner, government official or public or political officer.

## **CONFLICTS OF INTEREST**

Vendors must avoid any situations where personal, financial, or other interests could conflict with their obligations to HHOYA. Any actual or potential conflicts of interest must be disclosed promptly to HHOYA.

## **GIFTS, ENTERTAINMENT, AND HOSPITALITY**

Vendors may not offer gifts, entertainment, or hospitality to HHOYA employees or representatives that could be perceived as intended to influence a business decision. Any such offerings must be modest, infrequent, and comply with local laws and customary business practices.

## **FAIR COMPETITION AND ANTITRUST COMPLIANCE**

Vendors must conduct business in a manner that promotes fair competition. They are required to comply with all applicable antitrust and competition laws and must avoid any practices that unlawfully restrict competition or trade.

## **INTERNATIONAL TRADE COMPLIANCE**

Vendors must comply with all applicable international trade laws and regulations, including, but not limited to, export controls, trade restrictions, economic sanctions, and anti-boycott laws. They are responsible for ensuring that their business practices and products meet all legal and regulatory requirements in every market where they operate. Vendors doing business with HHOYA must also comply with other import or export laws that require HHOYA or Vendors and their business partners to pay duties and/or to obtain specific licenses, permits or other documentation before transferring products and technical data across borders.

## **HUMAN RIGHTS AND LABOR STANDARDS**

HHOYA is committed to respecting human rights and expects its Vendors to share this commitment. Vendors must comply with internationally recognized human rights standards and ensure that their operations do not contribute to human rights abuses. This includes prohibiting forced labor, child labor, and human trafficking.

## **NON-DISCRIMINATION AND INCLUSION**

Vendors must provide a workplace free from discrimination and harassment. Employment decisions should be based on merit, and no individual should be discriminated against based on race, gender, age, sexual orientation, religion, disability, or any other protected characteristic. Vendors are also encouraged to promote diversity and inclusion within their workforce and supply chain.

## **WAGES, BENEFITS, AND WORKING HOURS**

Vendors must provide fair wages, benefits, and working hours in compliance with applicable laws and industry standards. Employees should be compensated for all hours worked, including overtime, and should be provided with appropriate rest periods and holidays.

## **HEALTH, SAFETY, AND WORKING CONDITIONS**

Vendors are required to provide a safe and healthy work environment for their employees. They must comply with all applicable health and safety laws and regulations and take proactive measures to prevent workplace accidents and injuries. At a minimum, Vendors must provide potable drinking water, clean and accessible restrooms, adequate lighting and ventilation, fire and emergency exits, essential life safety equipment, emergency aid kits and access to emergency medical care.

Employees must be protected and prevented from exposure to severe health or safety hazards, which are to be understood as health or safety hazards that are likely to pose an immediate risk of causing death or permanent injury or illness. In addition, Vendors must comply with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection, and electrical, mechanical and structural safety.

## **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Vendors must respect the rights of employees to freely associate, join trade unions, and engage in collective bargaining, as permitted by local laws. Vendors must not interfere with or retaliate against employees who choose to exercise these rights.

## **QUALITY**

Each Vendor must meet product specifications and other HHOYA requirements relating to the quality of products or services supplied by the Vendor. In addition, each Vendor must meet any quality and safety standards required by applicable law. All documentation provided by a Vendor relating to such products or services must accurately describe the product or service provided.

## **ENVIRONMENTAL RESPONSIBILITY**

HHOYA is committed to environmental stewardship and expects its Vendors to minimize their environmental impact. Vendors must comply with all applicable environmental laws and regulations and implement practices that promote resource efficiency, waste reduction, and pollution prevention.

## **SUSTAINABILITY AND SOCIAL RESPONSIBILITY**

Vendors are encouraged to adopt sustainable practices that align with HHOYA's commitment to social responsibility. This includes responsible sourcing, reducing carbon footprints, and engaging in community initiatives that contribute to social and economic development.

## **DATA PROTECTION AND PRIVACY**

Vendors must protect the privacy and confidentiality of personal data in accordance with applicable data protection laws, including GDPR and other relevant regulations. Vendors must implement appropriate technical and organizational measures to safeguard personal data against unauthorized access, loss, or misuse.

## **CONFIDENTIALITY AND INTELLECTUAL PROPERTY**

Vendors must respect the confidentiality of HHOYA's proprietary information and intellectual property. Unauthorized use or disclosure of HHOYA's confidential information, including trade secrets, business plans, and technological innovations, is strictly prohibited.

## **REPORTING AND WHISTLEBLOWING**

Vendors are required to report any actual or suspected violations of this Code or any applicable laws to HHOYA promptly. HHOYA provides a confidential and secure channel for reporting such concerns and strictly prohibits retaliation against anyone who reports in good faith.

## **MONITORING, AUDITING, AND COMPLIANCE**

As a condition of doing business with HHOYA, each Vendor must comply with this Vendor Code. HHOYA reserves the right, but not obligation, to monitor compliance with this Vendor Code, including the right to conduct, or have its designee conduct, unannounced inspections of Vendors' facilities and records. Vendors must cooperate fully with any audits or investigations and provide all necessary information and documentation. Non-compliance may result in corrective actions, up to and including termination of the business relationship.

## **AMENDMENTS AND MODIFICATIONS**

HHOYA reserves the right to amend or modify this Vendor Code of Conduct at any time. Vendors will be notified of any significant changes and are expected to comply with the updated standards.

## **ACKNOWLEDGMENT AND ACCEPTANCE**

By engaging in business with HHOYA, Vendors acknowledge and accept the terms of this Vendor Code of Conduct. Vendors are expected to communicate these standards to their employees, agents, and subcontractors and ensure that they are fully implemented throughout their operations.