



HOYA Anti



and the UK Anti



X. Duty to Report

HOYA Representatives must report actual, potential, or suspected corruption to Compliance including both direct and Third Party corruption



XIII. Definitions

- “Bribe” – A Bribe can be anything of value offered for an Improper Purpose.
- “Business Partner” or “Third Party” – A company or individual that is not directly employed by HOYA but is conducting activities on behalf of HOYA or in furtherance of HOYA’s business.
- “Government” –