

> Human Rights Initiatives

Respect for Human Rights

To support and respect the protection of internationally proclaimed human rights as a member of global society.

Activity Policies

- Nikon Corporate Social Responsibility (CSR) Charter
- Nikon Code of Conduct
- UN Global Compact

Relevant Priority Issues

- Respect for human rights and labor practices, and promotion of diverse employees

Human Rights Initiatives

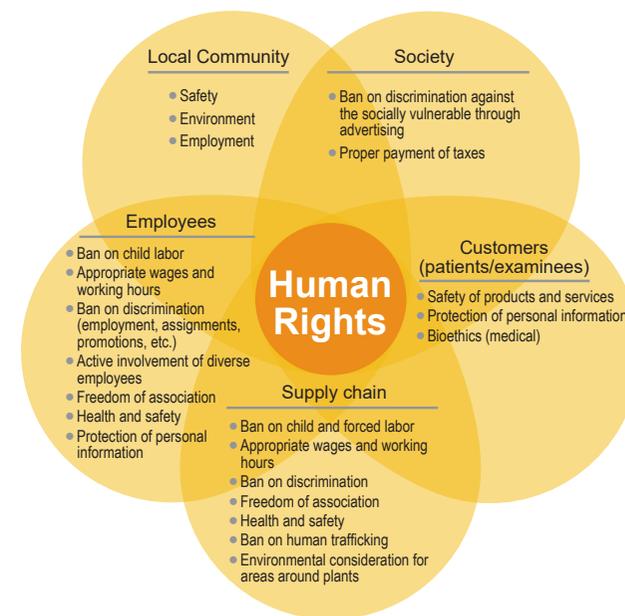
Nikon Group respects human rights. We strive neither to be engaged in human rights abuse by ourselves nor to be involved in any such activities in complicity with others.

Basic Policy

Through our business activities, Nikon Group is directly and indirectly involved in the human rights of a variety of stakeholders, including our customers, employees, and the people who live in the communities around our business facilities. In order to respect the basic human rights of all people and eliminate all forms of discrimination and harassment, forced and child labor, and human trafficking, Nikon Group engages in initiatives centering around human rights advisory committees and departments in charge of human rights.

In the international community, awareness of the high risk of the violation of the human rights of workers in supply chains has increased. Nikon Group is aware of this issue as well and in turn we have established the Nikon CSR Procurement Standards based on the Electronic Industry Citizenship Coalition (EICC) Code of Conduct to tackle supply chain human rights and worker issues. Further, as regards conflict minerals, a cause of serious human rights violations, we have established our own Policy on Conflict Minerals and are continuously engaged in the issue.

● Nikon Group and Human Rights



Main Committees and Departments in Charge and Handling Themes Related to Human Rights

Committees and departments in charge	Main handling themes
CSR Committee	General human rights
Human Resources Department	Employee employment, treatment, promotions, health and safety, etc.
Information Security Department	Protection of personal information
Bioethics Committee	Bioethics (ethics of researching concerning human beings)
Supply Chain Subcommittee	Supply chain human rights (conflict minerals, modern slavery, etc.)

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Initiatives for Preventing Human Rights Violations

Internal human rights and labor investigations are conducted annually in Nikon Group. These investigations examine whether incidents of discrimination and other serious matters have taken place. Their results are reported to the CSR Committee, which orders that additional investigations or corrections be made as necessary in an effort to stop and prevent their recurrence. In the year ended March 31, 2017, investigations were conducted at Nikon Group, including non-consolidated Group companies, with no serious problems having been found. As regards our supply chain, the Nikon CSR Procurement Standards ask that our supply partners respect the human rights of workers. Specifically, they are asked to comply with laws and social standards (such as bans on child and forced labor, issues related to the problem of conflict minerals) regarding the human rights of all employees, including temporary, migrant, student, contract, direct, and any other type of employee. In addition, self-implemented CSR investigations and audits are conducted at our supply partners to aid in our understanding of actual conditions. In the year ended March 31, 2017, investigations were conducted 214 companies and audits at 3, with no serious problems being discovered. Moreover, as regards the problem of conflict minerals, investigations regarding the source countries of conflict minerals and due diligence are conducted by Nikon Group annually. Investigations conducted in the year ended March 31, 2017 did not identify the use of any minerals which were related to conflicts.

[▶ Promoting CSR Procurement \(P67\)](#)

[▶ Dealing with the Issue of Conflict Minerals \(P69\)](#)

Investigation Regarding Human Rights Risks Concerning Immigrant Workers in Thailand

In recent years NGOs and the media have identified high human rights risks concerning immigrant workers in Thailand. As Thailand is one of our key production bases, Nikon Group commissioned an investigation from an external professional body in the year ended March 31, 2017 with the aim of gaining an understanding of the current situation.

Reporting and Consultation System

Nikon Group has established the Code of Conduct Hotline (Reporting and Consultation System) for employees which they can use to discuss issues concerning human rights.

[▶ Code of Conduct Hotline \(Reporting and Consultation System\) \(P87\)](#)

Human Rights Education

Nikon Group publishes a CSR newsletter aimed at all Group employees, part of the purpose of which is to provide them with information on and educate them about human rights. In addition, in the year ended March 31, 2017, Nikon Group conducted education and training in Japan regarding internationally recognized human rights issues such as conflict minerals and modern slavery for our Corporate Ethics Coordinators, Supply Chain Subcommittee members, and employees in charge of procurement in our business units. In addition, overseas, we implemented education for employees in charge of procurement in China, Thailand, and Europe. We also held information sessions regarding our CSR Procurement Standards and conflict mineral investigations for our supply partners with the aim of deepening their understanding of the importance of tackling human rights issues and Nikon Group's respect for human rights.

[▶ Promoting CSR Procurement \(P67\)](#)

Compliance with the UK Modern Slavery Act

The Modern Slavery Act came into effect in the United Kingdom in October 2015. Nikon Group has released a statement on website in accordance with the act.