

Nikon Human Rights Policy

Effective Date: April 1, 2019

Nikon (Nikon Corporation and all of its subsidiaries worldwide) has a corporate philosophy of “Trustworthiness and Creativity”. Respecting human rights forms the basis necessary to gain trust from stakeholders and generate value for society.

The Nikon Code of Conduct specifies our overarching position on respect for human rights. The Nikon Human Rights Policy (this policy) complements our Code of Conduct and further outlines our approach to human rights issues related to our business activities.

This policy applies to all of Nikon’s directors, officers and employees. We also expect our procurement partners and other business partners to understand and uphold the principles of this policy. Implementation of this policy is supervised by the CSR Committee of Nikon Corporation which includes several members of our Board of Directors.

1. Commitment to respect human rights

We are committed to respecting human rights as set out in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and support the

ten principles of the United Nations Global Compact. We also support the United Nations Guiding Principles on Business and Human Rights and strive to operate in line with them.

We recognize that our business activities may impact the human rights of internal and external stakeholders. We strive to avoid infringing on human rights, or contributing to their infringement. If an adverse impact on human rights is directly linked to our operations, products or services by our business relationships, we will work with relevant parties including our procurement partners and other business partners, and seek to exercise our leverage to prevent or mitigate such adverse impacts.

We comply with applicable local laws and regulations wherever we operate. Where local laws conflict with international human rights standards, we will comply with local laws, while seeking ways to honor the principles of internationally recognized human rights to the greatest extent possible.

2. Conducting human rights due diligence

In line with the United Nations Guiding Principles on Business and Human Rights, we will assess human rights risks in our business, and work to

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prevent and mitigate any identified adverse human rights impacts with which we are involved. Where we identify that we have caused or contributed to an adverse human rights impact, we will endeavor to remediate such impact through appropriate processes.

We are committed to engaging with stakeholders whose human rights may be affected by our operations, in a timely manner, in order to understand and address their human rights challenges.

We have established a reporting and consulting system for directors, officers and employees so that we could identify and address any violation or potential violation of the Nikon Code of Conduct including issues related to human rights. For external stakeholders, we have several channels of inquiry through which concerns related to our business operations can be raised including human rights issues. We will continue to work towards establishing effective grievance mechanisms.

We will provide adequate training to ensure our directors, officers and employees are able to implement and comply with this policy.

We will monitor the results of our actions concerning respect for human

rights, and work to enhance our organizational structure and systems for effective implementation of this policy. We will also regularly and publicly disclose our progress towards implementing this policy.

3. Human rights issues particularly relevant to our business

We recognize that addressing the following human rights issues linked to our business operations constitutes an essential component of our social responsibility.

-Prohibition of Forced Labor and Child Labor: we do not engage in any forced labor (including any form of human trafficking) or child labor.

-Elimination of Discrimination and Harassment: we strive to eliminate discrimination and harassment, and to prevent their associated negative impacts to an individual's dignity, our workplace environment, and/or our business operations.

-Occupational Health and Safety: we maintain a healthy and safe work environment. We comply with the applicable laws and regulations related to occupational health and safety and seek to prevent occupational accidents wherever we operate.

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-Freedom of Association and the Right to Collective Bargaining: we respect the basic labor rights regarding freedom of association and the right to collective bargaining in accordance with the applicable laws and regulations of the countries where we operate.

-Working Hours and Wages: we comply with laws and regulations related to working hours and wages of the countries where we operate.

-Right to Privacy: we acknowledge that processing personal data in a proper manner is critical, and therefore we comply with laws and regulations related to personal data protection wherever we operate. Furthermore, we continue to enhance our efforts to put in place necessary and appropriate management systems in order to ensure personal data is secured and protected.

-Human Rights Issues in the Supply Chain: we respect the human rights of workers in our supply chain, and promote respect for their human rights. We recognize issues concerning mineral procurement, such as human rights abuses and environmental destruction, and continue our efforts to promote responsible sourcing.

4. Approval

This policy has been approved by the Board of Directors of Nikon Corporation.

- i The International Bill of Human Rights is the general term referring to three documents: the Universal Declaration of Human Rights and its corresponding two international treaties, namely the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. The Universal Declaration of Human Rights was adopted at the U.N. General Assembly in 1948 as a common standard of achievement for all people and all nations, and sets out fundamental human rights to be universally protected.
- ii The ILO Declaration on Fundamental Principles and Rights at Work sets out the following four categories as minimum labor standards to be protected: freedom of association and the right to collective bargaining, elimination of all forms of forced or compulsory labour, the effective abolition of child labour, and the elimination of discrimination in respect of employment and occupation.
- iii The UN Global Compact specifies ten principles that companies should implement within their sphere of influence for the four categories of: Human Rights, Labour, Environment, and Anti-Corruption.
- iv The UN Guiding Principles on Business and Human Rights offer authoritative guidance on “State duty to protect human rights”, “Corporate responsibility to respect human rights” and “Access to remedy”, outlining the standard for States and business to prevent and address the risk of adverse impact on human rights linked to business activity.