

Nikon Green Procurement Standards



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NIKON CORPORATION

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Preface

The Nikon Group upholds the “Nikon Basic Procurement Policy” and performs material procurement with sincerity and fairness in order to continuously provide our customers with products that meet their expectations and to develop business that contributes to a more desirable society and global environment. With this as a base, the “Nikon CSR Procurement Standards” were formulated to give the supply chain societal accountability and the “Nikon Green Procurement Standards” were formulated for procurement of components and materials with consideration to the global environment.

In Nikon Group procurement activities, all of our procurement partners have been requested to observe the “Nikon Green Procurement Standards.” Priority is given to the purchase of items produced while taking environmental issues into consideration and to suppliers who are proactive in caring for and conserving the environment. This is required for our procurement partners to meet our requirements as we aim to contribute to a reduction of environmental burden within the entire supply chain.

In recent years, especially with the strengthening of national regulations related to hazardous chemical substances such as the RoHS directive and REACH regulations in Europe, management of hazardous chemical substances implemented in the overall supply chain has become an important issue. Not only the Nikon Group but all procurement partners are required to build and apply the Management System of Chemical Substances in Product, and Nikon as well as our procurement partners perform thorough management of hazardous chemical substances in their products.

This document describes the standards that should be met by the Nikon Group and all procurement partners and the specific actions to be taken that require your cooperation in order to promote Nikon green procurement activities. After checking the contents, observe all of them.

Nikon Corporation
General Manager of Production Technology Division

Section 1: Nikon Green Procurement Standards

1. Objective

The Nikon Group ^(Note 1) has established the standards specified in this document (The Standards) as part of its efforts to offer environmental conscious products in contributing to the establishment of a sustainable society. The Standards contain an explanation of the Nikon Group Philosophy and standards, requests to suppliers, and evaluations and measures. The Nikon Group, in cooperation with suppliers proactively involved in environmental protection programs, promotes the implementation of green procurement programs based on The Standards.

(Note 1) Nikon Group: Nikon Corporation and the domestic and overseas group companies of Nikon Corporation. The group companies where The Standards are applied are shown in "Appendix 1."

2. Basic Philosophy Regarding Green Procurement

Nikon Basic Green Procurement Policy

- 1. To give priority to the purchase of items produced while taking environmental issues into consideration.**
- 2. To give priority to suppliers who are proactive in caring for and conserving the environment.**

2.1 Selection of Procurement Items

The Nikon Group, in accordance with the document "Separate Volume: Corresponding Chemical Substance Lists" ^(Note 2), procures items that meet the regulations specified in the document.

(Note 2) For the document "Separate Volume: Corresponding Chemical Substance Lists", always reference the latest edition.

2.2 Supplier Selection

The Nikon Group gives business priority to suppliers who meet the following conditions.

- (1) Those that make proactive efforts towards environmental conservation.
- (2) Those that appropriately remove or reduce hazardous chemical substances included in products.
- (3) Those that appropriately control ^(Note 3) chemical substances included in products.
- (4) Those who comply with the national regulations of each country related to their company and relevant international conventions.
- (5) Those that can be a subject to surveys regarding contained chemical substances.

(Note 3) Control: Suppliers should establish and maintain a system that enables them to promptly provide information on environment impact chemical substances, including the types and amounts of the substances used in their products, as well as the parts of products and processes in which the substances are used, in response to requests from the Nikon Group.

3. Applicable Scope

- (1) All organizations and business activities of suppliers (including their manufacturing processes and chemical substances used in the processes)
- (2) Procured products
 - 1) Finished products
 - (a) Products designed and manufactured by third parties contracted by Nikon, and sold with the Nikon brand.
 - (b) Attachment ^(Note 4) and accessories ^(Note 5) with other brand names sold by the Nikon Group; except general-purpose products for which compliance with relevant environmental regulations can be publicly confirmed.
 - (c) Sales promotion goods with the Nikon brand that will be delivered to end users.
 - 2) Parts and materials

Parts and materials comprising Nikon products ^(Note 6), including:

 - Units, modules, assembly parts, etc.
 - Electric parts (print substrates, devices, etc.)
 - Mechanism elements (machinery formed parts, screws, etc.)
 - Materials (metal materials, resin materials, glass materials, etc.)
 - Printing materials (instructions, warranty cards, etc.)
 - Indirect materials (adhesives, lubricants, solders, paints, etc.)
 - Repair parts.
 - 3) Packaging

Packaging materials used for Nikon products, finished goods, parts and materials, including packing materials used in transport.

 - Presentation boxes, cardboard, buffer materials, protective bags, films, etc.
 - Printing inks, labels, tapes, bands, etc.
 - Palettes, wooden boxes, etc.

The scope must apply except for materials controlled by shipping companies or suppliers (returnable containers, invoices, etc.), or the case where the total amount of materials is limited and a recipient business unit consents to dispose of the materials in the Nikon Group.
- (3) Exemption

Equipment, tools (for general and specific purposes), and their packaging (only when they are compliant with related international treaties and each country's environmental regulations).

(Note 4) Attachment: Goods attached to Nikon products as standard (cables, batteries, protective covers, cases, etc.)

(Note 5) Accessories: Goods physically equipped to expand the function of Nikon products (filters, remote controllers, manipulators, etc.)

(Note 6) Nikon products: Goods designed or manufactured by the Nikon Group and those sold with the Nikon brand

4. Green Procurement Requirements

The Nikon Group requires the below conditions related to green procurement to be undertaken by our suppliers so that the Nikon Group can give priority to the purchase of items produced while taking environmental issues into consideration and to suppliers who are proactive in caring for and conserving the environment and in management of chemical substances in products based on “2. Basic Philosophy Regarding Green Procurement.”

4.1 Environmental Management System

4.1.1 Establishment and Operation of the Management System of Environmental Conservation

A system for reducing the environmental burden caused by business activities is established and operated appropriately. The system must also cover the environmental impact chemical substances used in manufacturing processes.

4.1.2 Establishment and Operation of the Management System for Chemical Substances in Products

A system for managing and reducing the environment impact chemical substances included in procured products is established and operated appropriately.

4.2 Environmental Impact Chemical Substances

4.2.1 Regulatory Compliance for Procurement Items

Comply with the regulations regarding prohibited chemical substances and controlled chemical substances, as stipulated in the document “Separate Volume: Corresponding Chemical Substance Lists.”

4.2.2 Regulatory Compliance for Processes

Comply with the regulations regarding prohibited chemical substances in processes and controlled chemical substances in processes, as stipulated in the document “Separate Volume: Corresponding Chemical Substance Lists.”

Table 1: Green procurement requirement list

| | |
|---|---|
| Environmental management system | 1. Establishment and Operation of the Management System of Environmental Conservation |
| | 2. Establishment and Operation of the Management System for Chemical Substances in Products |
| Environmental impact chemical substances | 1. Regulatory Compliance for Procurement Items |
| | 2. Regulatory Compliance for Processes |

Table 2: Composition of chemical substances specified in The Standards

| | | |
|---|------------------------------------|---|
| Environmental impact chemical substances | Procurement items | 1. Prohibited Chemical Substances |
| | | 2. Controlled Chemical Substances |
| | Manufacturing processes | 1. Prohibited Chemical Substances in Manufacturing Processes |
| | | 2. Controlled Chemical Substances in Manufacturing Processes |

Section 2: Requests to Suppliers

1. Basic Agreement and Quality Assurance Agreement

Prerequisite to becoming a supplier to the Nikon Group is concluding a “Basic Agreement and Quality Assurance Agreement.” Article 32 (Environmental Management) includes The Standards and related directives to be complied with. This provision signifies that the supplier consents to conform to The Standards as well as to cooperate upon request with Nikon in matters related to these standards. The Standards are to be confirmed upon concluding an agreement by suppliers.

For contracts with suppliers outside of Japan, all contracts are individual and require a conclusion of the separate “Nikon Green Procurement Standards Agreement.” For the agreements, inquire with a relevant procuring department of the Nikon Group.

| | Item | Nikon Group | Supplier |
|----------------------------------|--|---|----------------------------|
| At the start of being a supplier | Understanding of the supplier related contacts and the content of requirements | “Basic Agreement and Quality Assurance Agreement” (Article 32 (Environmental Management)) | Conclusion |
| | | “Nikon Green Procurement Standards” | Confirmation and agreement |

Figure 1 Confirmation and measures for supplier related contracts and the environmental management system

2. Requests Related to the Environmental Management System

2.1 Efforts towards Management of Environmental Conservation

2.1.1 Establishment and Operation of the Management System of Environmental Conservation

In order to reducing the environmental burden that occurs during business activities, establishment of a system to manage environmental conservation is requested.

While a system certified by a third-party certification body is preferable, a supplier’s proprietary management system of environmental conservation is also acceptable. The Nikon Group requests establishment of one of the following three systems as well as its appropriate operation.

- (1) System certified by ISO 14001
- (2) Management system of environmental conservation certified by third-party certification other than ISO 14001
Eco-Action 21, Eco-Stage, KES, Compact Eco-System, Michinoku EMS (these are Japanese certification systems), etc.
- (3) Supplier’s proprietary management system of environmental conservation

The content and operational status are confirmed through a survey and assessment according to 2.4 Cooperation to the Environmental Management System Survey and 2.5 Cooperation to the Environmental Management System Assessment.

For basic contents of the management system of environmental conservation required by the Nikon Group other than (1) or (2) shown above, see Appendix 3.

Also, for suppliers without an established management system of environmental conservation, support will be provided if necessary.

The prohibited chemical substances in manufacturing processes and controlled chemical substances in manufacturing processes shown in The Standards are generally included in the “Management of Environmental Conservation“.

2.1.2 Observance of Environmental Regulations Applicable to the Work Location

Suppliers are requested to observe all environmental regulations as well as any other requirements for the country or region in which their work location is located. The classifications of the main environmental regulations are as follows.

- (1) Regulations related to the appropriate collection and disposal of chlorofluorocarbons
- (2) Regulations related to controlled discharge and appropriate processing of waste (transportation, disposal, recycling, etc.)
- (3) Regulations related to sooty smoke, volatile organic compounds, dust, harmful air pollutants, and vehicle exhaust and gas output that have an effect on the atmosphere
- (4) Regulations related to drainage water from the work location to public water supplies
- (5) Regulations regarding noise, vibration, and odor
- (6) Regulations regarding hazardous chemical substances, poisonous substances, dioxins, and PCBs
- (7) Regulations regarding workers' health and safety

2.2 Efforts towards Management of Chemical Substances in Products

2.2.1 Establishment and Operation of the Management System for Chemical Substances in Products

Establishment and appropriate operation ^(Note 7) of a system for appropriately managing and reducing the chemical substances included in procurement products is requested.

Establishment should be implemented with a method that matches the suppliers scale, type of business, and type of operations.

The Nikon Group recommends the “Guidelines for the Management of Chemical Substances in Products (Edition 4.0)” published by the Joint Article Management Promotion-consortium (JAMP). For your reference, items to be implemented are shown in Appendix 4.

For suppliers yet without an established management system for chemical substances in products, support will be provided if necessary.

In addition, the content and operational status are confirmed through a survey and assessment according to 2.4 Cooperation to the Environmental Management System Survey and 2.5 Cooperation to the Environmental Management System Assessment.

2.2.2 Compliance with Regulations Related to Chemical Substances

For regulations related to chemical substances included and other legal requirements, comply with the document “Separate Volume: Corresponding Chemical Substance Lists.”

2.3 Efforts in the Supply Chain

The Nikon Group believes that it is necessary for each organization within the supply chain to make efforts in the establishment of the management system for chemical substances ^(Note 7). Therefore, it is requested that our suppliers ask the sub-contracted suppliers to manage chemical substances and verify their management status.

Also, “Guidelines for the Management of Chemical Substances in Products (Edition 4.0)”, recommended in the Nikon Green Procurement Standards, includes the items to be required and verified by our suppliers at the sub-contracted suppliers (5.5.4.2 Verification of the Management Status of Chemical Substances in Products at Supplier).

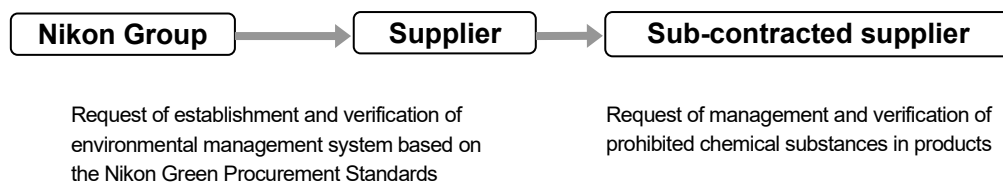


Figure 2 Efforts towards management of chemical substances in products in the supply chain

(Note 7) For information regarding “Establishing and Operating a Management System” common to both the Management System of Environmental Conservation and Management System of Chemical Substances in Products, see Appendix 2.

2.4 Cooperation to the Environmental Management System Survey

The Nikon Group may perform an environmental management system survey when starting business with a supplier and later as needed. The supplier’s cooperation in that survey is requested. Also, depending on the evaluation based on the results of the survey, measures are taken according to The Standards. Details regarding the evaluation and measures are explained in Section 3, “Evaluation and Measures.”

2.4.1 Contents and Targets of the Environmental Management System Survey

- (1) The establishment and the operation status of the environmental management system specified by The Standards are verified in the environmental management system survey.
- (2) The environmental management system survey sheet is in the form of a questionnaire. The supplier is requested to enter Conformity, Semi-conformity, Nonconformity, or Not applicable in the self-evaluation field for each question and enter relevant comments.
- (3) The environmental management system survey is periodically conducted.

2.4.2 Environmental Management System Survey Procedure

- (1) The Nikon Group sends the survey sheet along with the request for cooperation in an environmental management system survey. The supplier is requested to fill it out with their information and turn it in.
- (2) If the submitted environmental management system survey sheet contains deficiencies, unclear points, etc., the Nikon Group may interview the supplier and ask the supplier to resubmit it.
- (3) The supplier may be requested to take corrective actions depending on the results of the survey.

2.5 Cooperation to the Environmental Management System Assessment

The Nikon Group may perform an environmental management system assessment if necessary after a supplier starting business with the Nikon Group, so the supplier's cooperation for that assessment is requested. Also, depending on the evaluation using the results of the assessment as a base, measures are taken according to The Standards. Details regarding the evaluation and measures are explained in Section 3, "Evaluation and Measures."

2.5.1 Contents and Targets of the Environmental Management System Assessment

- (1) The establishment and operation status of the environmental management system specified by The Standards are verified in the environmental management system assessment.
- (2) In addition to manuals, regulations, procedure manuals, records, and evidence, manufacturing sites may also be checked.

2.5.2 Environmental Management System Assessment Procedure

- (1) The Nikon Group performs the assessment after obtaining suppliers' consent to the assessment. The assessment file is sent along with the request. The supplier is requested to fill it out with their information and turn it in.
- (2) Before performing the assessment, a preliminary explanatory meeting will be held to explain the content and procedure of the assessment and determine the range and date of the assessment. If the existence of an environmental management system cannot be verified, establishment of a system is requested. Consultation regarding the establishment method and support will be given if necessary.
- (3) After the preliminary explanatory meeting, the supplier is requested to submit the assessment file with all required items filled in before the assessment.
- (4) For the assessment, the Nikon Group assessment team visits the suppliers' work site and checks the content input into the assessment file. If it is found that all items are Conformity, the assessment ends at that time.
- (5) The supplier may be requested to take corrective actions depending on the results of the assessment. In such cases, the assessment ends once corrections are complete.

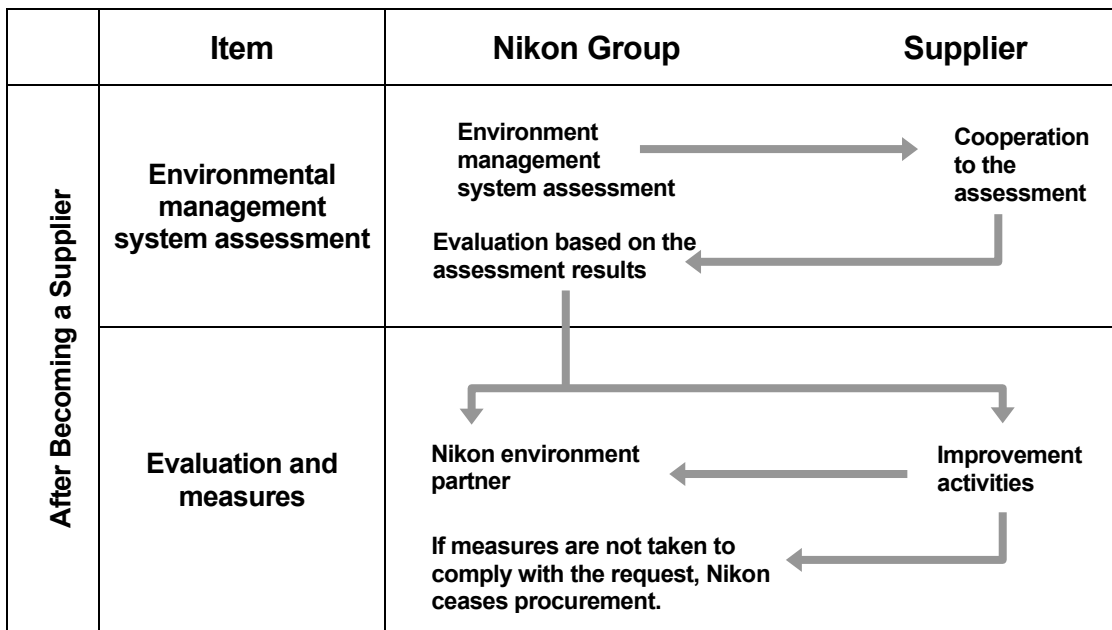


Figure 3 Assessment and evaluation of the environmental management system

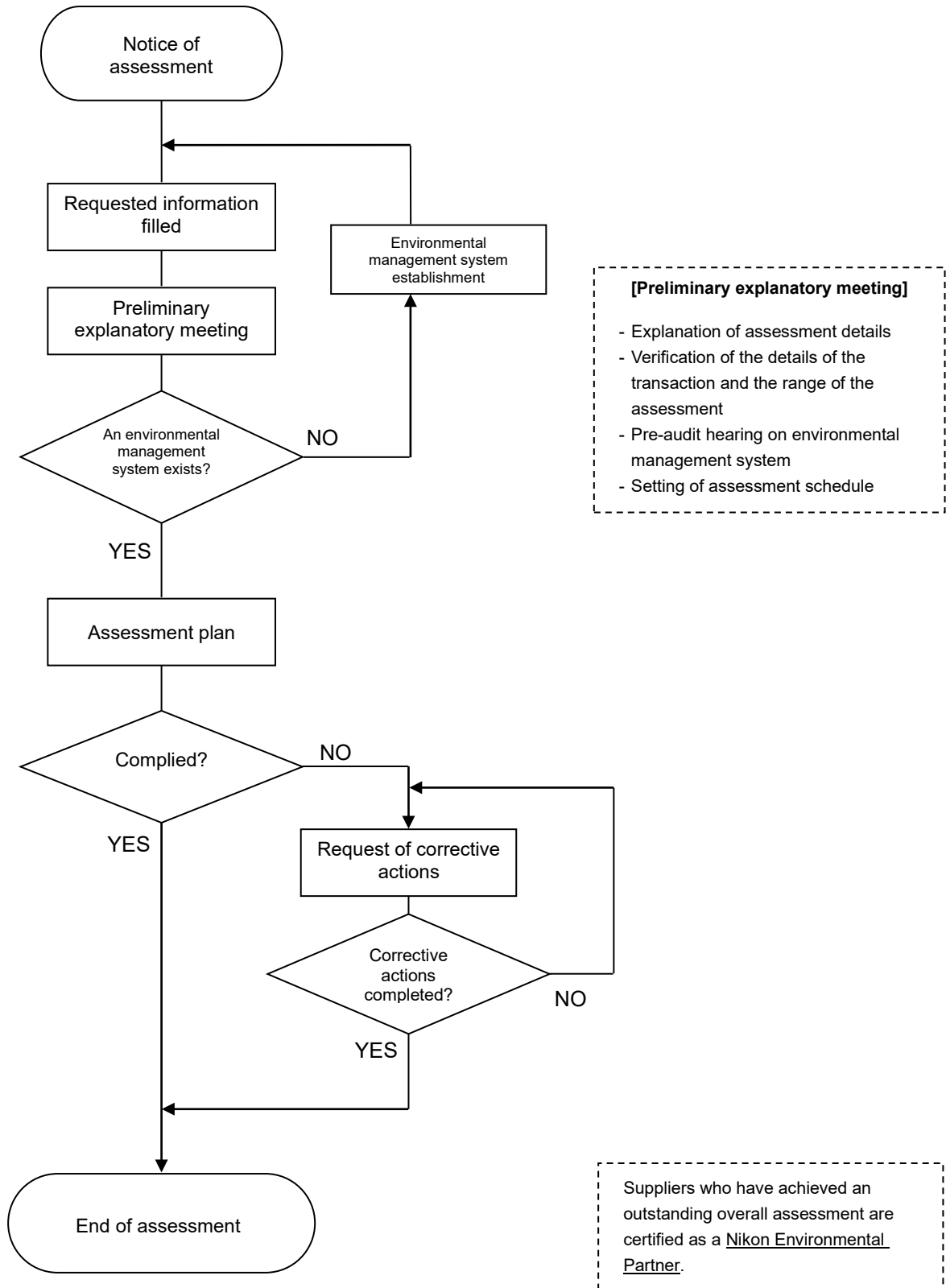


Figure 4 Flow of the environmental management system assessment

3. Requests Regarding Environmental Impact Chemical Substances

3.1 Regulatory Compliance with the Document “Separate Volume: Corresponding Chemical Substance Lists”

The Nikon Group has established the standards in the document “Separate Volume: Corresponding Chemical Substance Lists” regarding the environmental impact chemical substances used in procured products and their manufacturing processes, based upon applicable national environmental regulations, both in Japan and overseas, as well as related international conventions. Suppliers are requested to observe these standards. However, there are cases when the content of a request from each business unit or a group company may differ depending on the Nikon product, laws and regulations, or operating environment.

(Note 8)

For information regarding target materials, main laws and industrial standards, targets, thresholds, use examples, and exceptions, see the document “Separate Volume: Corresponding Chemical Substance Lists.”

(1) Prohibited Chemical Substances

For procurement items, inclusion of the prohibited chemical substances listed in the document “Separate Volume: Corresponding Chemical Substance Lists” over the threshold is prohibited. If no threshold is set, intentional addition is prohibited.

(2) Controlled Chemical Substances

If procured items contain controlled chemical substances listed in the document “Separate Volume: Corresponding Chemical Substance Lists,” the type, use location, use amount, use process, etc., are appropriately managed and should be reported immediately if requested by the Nikon Group.

(3) Prohibited Chemical Substances in Manufacturing Processes

For manufacturing of procurement items, suppliers are requested not to use chemical substances prohibited from use in manufacturing processes listed in the document “Separate Volume: Corresponding Chemical Substance Lists.”

(4) Controlled Chemical Substances in Manufacturing Processes

For manufacturing procurement items, suppliers are requested to properly manage controlled chemical substances in manufacturing processes as listed in the document “Separate Volume: Corresponding Chemical Substance Lists.”

(Note 8)

(1) Large-scale stationary industrial tools (LSSIT) and large-scale fixed installations (LSFI) are exempted from the application of the current RoHS2 (2011/65/EU). Accordingly, business units and group companies handling LSSIT and LSFI may ask suppliers to make a response not compliant with the RoHS2. In that case, follow the request.

(2) As for any prohibited substance for which a threshold has been set, if the denominator of the threshold at shipment as parts and units is different from that at the time of procurement of materials and indirect materials, the threshold at shipment may be used as criteria for procurement.

3.2 Cooperation to the Survey of Chemical Substances

Nikon Group conducts a survey regarding chemical substances in procurement items and requests cooperation to the survey. The survey format and tools may differ depending on the Nikon business unit or group company. Follow the instructions of the relevant procuring department.

In addition to survey results, the Nikon Group may ask your cooperation to submit analysis data, evidence, and a non-use guarantee.

3.3 Cooperation to the Prevention of Tampering and Contamination in Processes

The Nikon Group checks if there is a possibility of tampering and contamination with the prohibited chemical substances in the suppliers' manufacturing processes. If there is any such possibility, Nikon Group asks suppliers to control processes, including equipment and tools, so that tampering and contamination will be prevented.

For example, phthalate compounds easily transfer onto other molded objects under high temperature or in prolonged contact; therefore, appropriate control is required in manufacturing, as well as in storage and transportation.

3.4 Submission of Alternative Products/Substances and Technologies

In order to reduce the prohibited chemical substances included in products and used in manufacturing processes, Nikon requests the cooperation of suppliers in submitting samples for evaluation and analysis, switching to alternative products or materials, and introducing alternative technologies.

3.5 Cooperation to Change Control

If there are changes to the items specified by the Nikon Group business units or group companies, give notification immediately. Also, give prompt notification of any changes to the organization or management framework of the supplier.

3.6 Non-conformity Response

If non-conformity with the Nikon Green Procurement Standards is confirmed, report it immediately and take measures required by the Nikon Group.

Table 3 List of requests to suppliers

| Basic Agreement and Quality Assurance Agreement | |
|--|--|
| Environmental management system | 1. Efforts towards Management of Environmental Conservation |
| | 2. Efforts towards Management of Chemical Substances in Products |
| | 3. Efforts in the Supply Chain |
| | 4. Cooperation to the Environmental Management System Survey |
| | 5. Cooperation to the Environmental Management System Assessment |
| Environmental impact chemical substances | 1. Regulatory Compliance for the Document “Separate Volume: Corresponding Chemical Substance Lists” |
| | 2. Cooperation to the Survey of Chemical Substances |
| | 3. Cooperation to the Prevention of Tampering and Contamination During Processes |
| | 4. Submission of Alternative Products/Substances and Technologies |
| | 5. Support for Change Management |
| | 6. Non-conformity Response |

Section 3: Evaluation and Measures

1. Evaluation and Measures Related to the Environmental Management System

1.1 Environmental Management System Improvement Requests and Support

The Nikon Group will request that suppliers whose environmental management system does not meet The Standards make improvements by a specific deadline. Cooperation and support will be given as necessary.

In the event that a supplier proves, however, to be unwilling or incapable of implementing these improvements, Nikon further reserves the right to cease procurement.

1.2 Nikon Environmental Partner

Upon completion of an environmental management system assessment, the Nikon Group certifies suppliers who have achieved an outstanding overall assessment as a Nikon Environmental Partner. It is important to bear in mind, however, that this certification relates to the supplier's environmental management system itself, not to procured products.

The Nikon Group gives priority to doing business with suppliers that are Nikon Environmental Partners. Also, Nikon hopes to deepen mutual understanding and endeavors to boost mutual understanding that is beneficial to both Nikon and its suppliers as well as to contribute to the formation of a sustainable society.

(1) Requirements of Nikon environmental partner certification and effective period

Those who meet the requirements in "4.1. Environmental Management System" in "4. Green Procurement Requirements" of Section 1, The Standards as determined by the environmental management system assessment results are recognized as an Environmental Partner. Certification will be given to the supplier. The effective period of the Nikon environmental partners is three years.

(2) Nikon environmental partner renewal

A renewal assessment is performed to renew the effective period. The assessment is performed by either an on-site check by the Nikon Group assessment team or verification of submitted documents, or both.

(3) Cancellation of Nikon environmental partner certification

If the supplier has deviated significantly from the certification requirement listed in part (1) above, certification will be cancelled.

2. Evaluation and Cooperation Related to Environment Impact Chemical Substances

The Nikon Group requests regulatory compliance with the document "Separate Volume: Corresponding Chemical Substance Lists", cooperation to the survey about chemical substances, change control, and response to non-conformity. Also, the Nikon Group may request submission of a non-use guarantee.

In the event that a supplier is found to be using any of the prohibited substances in products or manufacturing processes specified in The Standards, Nikon reserves the right to request the supplier to stop using the substance, replace it with an alternative substance, and/or introduce alternative technology.

The Nikon Group will cease to do business with any supplier who does not respond to the requests from the Nikon Group.

3. Revision of the Standards

The Nikon Group will undertake revision of The Standards as necessary to remain in step with changes in applicable laws and regulation or as stipulated by the expectations of the general public. Notification of revisions will be made in writing in a timely fashion. If necessary, notification of deadlines for complying with such revisions will be made in writing after mutual consultation.

4. Information Management

Proprietary information provided to Nikon as a part of compliance with The Standards will be handled in the strictest confidentiality, as stipulated in the Nikon Basic Suppliers Contract*. (*Currently, only a Japanese version is available.)

Appendix 1: Group companies (current as of October 15, 2021)

The number of Nikon Group Companies may change from time to time.

| Japan | | | |
|--------------|-----------------------------------|----|----------------------------------|
| 1 | Sendai Nikon Corporation | 8 | Nikon Solutions Co., Ltd. |
| 2 | Nikon Imaging Japan Inc. | 9 | Nikon Engineering Co., Ltd. |
| 3 | Nikon Vision Co., Ltd. | 10 | Hikari Glass Co., Ltd. |
| 4 | Miyagi Nikon Precision Co., Ltd. | 11 | Nikon–Essilor Co., Ltd. |
| 5 | Tochigi Nikon Precision Co., Ltd. | 12 | Nikon Business Service Co., Ltd. |
| 6 | Nikon Tec Corporation | 13 | Nikon Systems Inc. |
| 7 | Nikon CeLL innovation Co., Ltd. | 14 | Tochigi Nikon Corporation |

| The Americas | | | |
|---------------------|----------------------------|---|---------------------------------------|
| 1 | Nikon Inc. | 6 | Optos, Inc. |
| 2 | Nikon Canada Inc. | 7 | Nikon Instruments Inc. |
| 3 | Nikon Mexico, S.A. de C.V. | 8 | Nikon Metrology, Inc. |
| 4 | Nikon Latin America, S.A. | 9 | Nikon Research Corporation of America |
| 5 | Nikon Precision Inc. | | |

| Europe | | | |
|---------------|-----------------------------|---|---------------------------|
| 1 | Nikon Europe B.V. | 5 | Nikon Metrology NV |
| 2 | Nikon (Russia) LLC. | 6 | Nikon Metrology GmbH |
| 3 | Nikon Precision Europe GmbH | 7 | Nikon Metrology U.K. Ltd. |
| 4 | Optos Plc | 8 | Nikon Metrology SARL |

| Asia and Oceania | | | |
|-------------------------|---------------------------------------|----|---|
| 1 | Nikon Hong Kong Ltd. | 10 | Nikon Lao Co., Ltd. |
| 2 | Nikon Singapore Pte Ltd. | 11 | Nikon International Trading (Shenzhen) Co., Ltd. |
| 3 | Nikon Australia Pty Ltd. | 12 | Nikon Precision Korea Ltd. |
| 4 | Nikon India Private Limited | 13 | Nikon Precision Taiwan Ltd. |
| 5 | Nikon Sales (Thailand) Co., Ltd. | 14 | Nikon Precision Shanghai Co., Ltd. |
| 6 | Nikon Middle East FZE | 15 | Nanjing Nikon Jiangnan Optical Instrument Co., Ltd. |
| 7 | Nikon Imaging (China) Sales Co., Ltd. | 16 | Nikon Instruments Korea Co., Ltd. |
| 8 | Nikon Imaging Korea Co., Ltd. | 17 | Nikon Instruments (Shanghai) Co., Ltd. |
| 9 | Nikon (Thailand) Co., Ltd. | 18 | PT Nikon Indonesia |

Appendix 2: Establishment and Operation of a Management System

As shown in Chapter 2, “2. Requests Related to the Environmental Management System”, establishment and operation of a “Management System of Environmental Conservation” and a “Management System for Chemical Substances in Products” is requested. Basic contents are shown in Appendix 3 and Appendix 4, and the meaning of establishing and operating a management system common to both systems is as follows:

The actual contents should desirably be performed in a method that matches the magnitude and actual situations of the organization. It is requested that a system with content that is applicable to the organization be established using Appendix 3 and Appendix 4 as a reference.

1. Establishment of a Management System

For establishment of a management system, responsibilities and procedures are determined for the following items (1) to (7) and more in depth explanations can be documented if necessary.

- (1) Formulate a policy and notify the policy.
- (2) Clarify the applicable range of management.
- (3) The management framework and manager
- (4) Establish goals and plans.
- (5) Operation and management
- (6) Evaluation and revisions
- (7) Report the results to the manager.

2. Operation of the Management System

Operation means performing the management system by following the responsibilities and procedures for the items (1) to (7) as described in “1. Establishment of a Management System” mentioned above, and recording logs of this process if necessary.

Appendix 3: Basic Management System of Environmental Conservation

1 Environmental policy

- (1) An environmental policy approved by management has been formulated.

2 Environmental management items

- (1) The environmental management items ^(Note 9) for business activities, products, and services have been determined.

3 Environmental regulations

- (1) The major environmental laws and regulations applicable to the selected environmental management items have been ascertained.

4 Environmental management system

- (1) Business management has assigned a manager for environmental management.
- (2) On implementation of environmental management, who is in charge of what is was made clear and the range of responsibilities and authorities were determined.

5 Environmental training

- (1) Training regarding environmental laws and regulations as well as training for emergencies has been performed.
- (2) Periodic checks are performed to confirm that employees hold necessary (legal) requirements for environmental conservation activities and that those abilities are retained.

6 Preparations and handling in emergency situations

- (1) A response procedure for emergency situations such as fire or earthquake has been established. (Contact information, person in charge, regulations, measures)

7 Monitoring and measuring

- (1) Monitoring/measurement results have been logged and managed.

8 Internal assessment

- (1) The system and operation are periodically checked with an internal assessment or by some other method.

9 Revisions by management

- (1) Revisions are instructed for corrective or preventative actions.

(Note 9) Environmental management item: an issue for which concrete actions should be taken for promotion of environmental conservation

Appendix 4: Guidelines for the Management of Chemical Substances in Products (Edition 4.0)

The “Guidelines for the Management of Chemical Substances in Products (Edition 4.0)” published by the Joint Article Management Promotion-consortium (JAMP) is recommended. Items to be implemented are shown below for your reference.

5.1 Context of the organization

5.1.1 Understanding the organization and its context

The organization shall clarify external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its management of chemicals in products.

5.1.2 Understanding the needs and expectations of stakeholders

The organization shall clarify the following items to understand the needs and expectations of stakeholders.

- a) The stakeholders closely related to the management of chemicals in products
- b) The requirements of those stakeholders that are closely related to the management of chemicals in products

5.1.3 Determining the scope of application of management of chemicals in products

The organization shall determine the appropriate scope of application of management of chemicals in products.

When determining this scope, the organization shall consider.

- a) The external and internal issues for the organization defined in 5.1.1
- b) The requirements of stakeholders defined in 5.1.2
- c) The relationship between the organization and chemical substances
- d) The externally provided products handled by the organization and the products delivered to external parties

The scope of application of management of chemicals in products shall be put in a state that can be used as documented information.

5.1.4 Implementation of the management of chemicals in products

The organization shall establish, implement, sustain and continuously improve the systems for the management of chemicals in products in accordance with the principles and action items for the management of chemicals in products stated in the Guidelines.

For the purpose of producing products which can fulfil the management criteria of chemicals in products, the management of chemicals in products shall be carried out according to the type of business operations of the organization at each stage of design and development, purchasing, manufacturing and delivery.

5.2 Leadership

5.2.1 Leadership and commitment

Top management shall demonstrate leadership and commitment with respect to the management of chemicals in products by.

- a) Taking accountability for the effectiveness of the management of chemicals in products.
- b) Positioning the management of chemicals in products as an activity of the organization.
- c) Making the necessary resources available for use (Refer to 5.4.1).
- d) Ensuring compliance with the management criteria for chemicals in products.

5.2.2 Policy

The top management shall establish the management policy of chemicals in products for the organization and shall formulate, implement and sustain plans based on that policy. Furthermore, the top management shall state that it will appropriately implement the management of chemicals in products.

5.2.3 Resources, Roles, Responsibility and Authority of an Organization

In order to implement effective management of chemicals in products, the top management shall define the responsibilities and authorities for the relevant roles and communicate this within the organization.

5.3 Plan

5.3.1 Actions to address risks and opportunities

When formulating a plan for the management of chemicals in products, the organization shall consider the external and internal issues for the organization defined in 5.1.1, the requirements of stakeholders defined in 5.1.2 and the scope of application defined in 5.1.3 and shall decide the risks and opportunities that must be approached as listed below to realize the intended results of the organization.

- a) Make it possible for the management of chemicals in products to achieve the intended results.
- b) Enhance the desirable effects.
- c) Prevent or reduce undesired effects.
- d) Promote continuous improvement.

The organization shall plan their actions to address risks and opportunities according to the above.

5.3.2 Objectives and planning to achieve them

The organization shall set the target for management of chemicals in products. The organization shall draw up, implement and sustain the implementation plan to achieve the target. The organization shall review the target and the implementation plan whenever needed.

When formulating a plan, the organization shall consider.

- a) The integration of the actions to address risks and opportunities (5.3.1) into the management of chemicals in products, the implementation of the actions and the

evaluation of their effectiveness

b) Points of improvement from performance evaluation

5.4 Support

5.4.1 Resources

The organization shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the management of chemicals in products.

5.4.2 Competence

The organization shall conduct the following items for competence.

- a) Clarify the competence required for persons involved in the management of chemicals in products at each stage of design and development, purchasing, manufacturing and delivery.
- b) Ensure that the persons involved in the management of chemicals in products have competence on the basis of appropriate education/training or experience.
- c) Retain documented information on the implementation of education and training.

5.4.3 Awareness

The organization shall ensure that persons involved in the management of chemicals in products are aware of.

- a) Management Policy of Chemicals in Products
- b) Objectives relating to the management of relevant chemicals in products?
- c) The risks related to their own work that require attention
- d) Their contribution to the effectiveness of the management of chemicals in products, including the benefits of improved performance.
- e) The meaning of not conforming with the principles and action items for the management of chemicals in products.

5.4.4 Communication

The organization shall determine the internal and external communication of the organization relevant to the management of chemicals in products, including.

- a) The contents of communication
- b) Implementation timing
- c) Targeted persons
- d) Implementation methods
- e) Staff responsible

5.4.4.1 Internal Communication

For the information related to the management of chemicals in products, the organization shall establish and implement procedures related to communication between the various levels and functions (departments) of the organization.

5.4.4.2 External communication

For information necessary for the management of chemicals in products, the organization

shall establish and implement procedures related to communication with external parties.

5.4.5 Documented information

The organization shall maintain or retain the documented information recommended in the Guidelines and also the documented information defined by the organization to be necessary for the effectiveness of the management of chemicals in products.

5.5 Operation

5.5.1 Operational planning and control

The organization shall plan, implement, manage and maintain the processes necessary to satisfy the management criteria for chemicals in products and to implement the actions determined in 5.3.1. (Refer to 5.1.4.)

The organization shall retain the level of documented information necessary to verify that the processes have been implemented in accordance with the plans.

The organization shall ensure that outsourced processes are being managed (Refer to 5.5.4).

5.5.2 Formulation of management criteria of chemicals in products

5.5.2.1 Customer communication

The organization shall clearly define and implement effective methods for communication with the customer for the following matters, and retain the details as documented information.

- a) The acquisition of information on the laws, regulations and industry standards that the customer must comply with
- b) Provision of Information on Chemicals in Products
- c) Provision of information on the management of chemicals in products
- d) The acquisition of feedback from the customer on products, including complaints

In case that any change is to be made to the information of chemicals in products, the organization shall notify the customer prior to such a change.

5.5.2.2 Defining the management criteria of chemicals in products

The organization shall determine the management criteria for chemicals in products relating to products and maintain them as documented information.

When clarifying the management criteria for chemicals in products, the organization shall define the details of items to be implemented, including.

- a) The requirements of legal regulations
- b) The identification of stakeholders related to the management of chemicals in products and their requirements and expectations
- c) Other items considered necessary by the organization

5.5.3 Management of Chemicals in Products at Design and Development

For the purpose of producing products which can fulfil the management criteria of chemicals in products in the stage of design and development, the organization shall clearly define the management criteria for chemicals in products at each stage of

purchasing, manufacturing and delivery in accordance with its own products and business operation type and shall put and maintain those management criteria in a state where they can be used as documented information.

5.5.4 Management of externally provided products

5.5.4.1 Collection and Verification of Information of Chemicals in Products

After first defining the action to be taken for the acquisition of information on chemicals in products and the results of verification, the organization shall then present the management criteria related to chemicals in products in purchasing to the supplier and obtain the information on chemicals in products. The organization shall verify if the information on chemicals in products obtained satisfies the management criteria related to chemicals in products in purchasing and shall retain the result as documented information. The acquisition and verification of information on chemicals in products in accordance with the management criteria related to chemicals in products in purchasing should be completed before the manufacturing is started.

5.5.4.2 Verification of the Management Status of Chemicals in Products at Supplier

The organization shall first define the action to be taken for the results of checks on the management status of chemicals in products at a supplier and then when selecting a supplier, the organization shall check that management status of chemicals in products and retain the result as documented information.

In case that the organization continues purchases with the supplier, for the purpose of fulfilling the management criteria of chemicals in products, the organization shall verify and document the supplier's management status of chemicals in products again whenever necessary.

5.5.4.3 Management of Chemicals in Products at Receiving

The organization shall first define the action to be taken for the results of checks on the products purchased at the time of receiving. Then, at the time of receiving, the organization shall check that the management criteria of the organization related to chemicals in products in purchasing are satisfied on the products purchased and shall retain the result as documented information.

5.5.4.4 Verification of the Management Status of Chemicals in Products at Outsourcing

If the organization outsources some processes such as product design and development or manufacturing to another organization, then the organization shall verify the management status of chemicals in products at the outsourcing contractor to ensure that the management criteria for chemicals in products can be complied with and shall retain the result as documented information. The organization shall define the action to be taken for the verification results in advance.

5.5.5 Management of Chemicals in Products in Manufacturing and Storage

5.5.5.1 Management in the manufacturing process

The organization shall manage the manufacturing processes in accordance with the

management criteria for chemicals in products for manufacturing processes and shall retain the results as documented information.

5.5.5.2 Prevention of Incorrect Use and Contamination

The organization shall implement preventive measures against contamination and incorrect use of declarable chemicals under the management criteria of chemicals in products

5.5.5.3 Identification and traceability

The organization shall assure traceability of the information of chemicals in products by appropriate manners in order to grasp, utilize, disclose and transfer the information of chemicals in products swiftly.

The organization shall define, save and implement the management method for chemicals in products information related to products.

5.5.6 Change management

The organization shall extract changeable elements which may affect declarable chemicals under the management criteria of chemicals in products. When any change arises, before the actual change takes place, the organization shall effectually confirm the change to be made to the chemicals in products and conduct a review based on the management criteria of chemicals in products.

The organization shall retain documented information describing the results of the review of changes, the person(s) authorizing the change, and any necessary actions arising from the review.

5.5.7 Delivery of products

Before the organization delivers products, the organization shall verify that the products satisfy the management criteria of chemicals in products for delivery.

The organization shall retain documented information on the delivery of products. This information shall include the following.

- a) Proof of conformance with the management criteria of chemicals in products
- b) Traceability to the person(s) authorizing the delivery

The organization shall also manage product warehouses to prevent incorrect shipment and contamination.

The organization shall consider matters such as the laws, regulations and industry criteria covered by the management criteria for chemicals in products, any nonconformance and the feedback from customers and shall also decide and implement the action to be taken after delivery for the products supplied.

5.5.8 Response to occurrence of nonconformity

The organization shall decide and document the methods to be used when nonconformity in chemicals in products occurs, to quickly contact persons within the organization, suppliers, outsourcing contractors and customers and to take temporary corrective action. After the temporary measure is taken, the organization shall investigate and identify the

cause and determine and implement the necessary countermeasures to prevent recurrence. The organization shall take preventive measures to avoid any occurrence of nonconformity. The organization shall retain documented information on the action when a nonconforming product occurs.

5.6 Performance evaluation and improvement

The organization shall evaluate the following items at predetermined intervals. The organization shall implement corrective action for matters which require correction. The organization shall retain the results of evaluations and corrective action as documented information and shall report the results to top management. The top management shall review those results of evaluations and corrective action.

- a) Situation of improvements
- b) Changes in external and internal issues related to the management of chemicals in products
- c) Information on management performance and effectiveness with regard to chemicals in products, including regarding the following trends:
 - 1) Relevant communication with external stakeholders
 - 2) Level of target achievement
 - 3) Conformance with the management criteria of chemicals in products
 - 4) Nonconformity and corrective action
 - 5) Performance evaluation results
 - 6) Supplier and external outsourcing contractor performance
- d) Suitability of resources
- e) Effectiveness of actions to address risks and opportunities
- f) Improvement planning

| Revision History | | |
|------------------|---------|--|
| Date | Edition | Description |
| Oct. 1, 2005 | 1.0 | First edition |
| Oct. 1, 2006 | 2.0 | Partial revisions of typographical errors |
| April 1, 2008 | 3.0 | <ul style="list-style-type: none"> • New structure, including combining section 3.3.3 <i>Requests for cooperation</i> with section 4. <i>Operations</i> as section 4. <i>Procedures for Nikon Green Procurement Standards</i> • Revisions to content of Section 1. <i>Nikon's Commitment to the Environment</i>: <ol style="list-style-type: none"> 1. <i>Introduction</i> • Revisions to Section 2. <i>Nikon Green Procurement Standards</i>: <ol style="list-style-type: none"> 1. <i>Objective</i> • 3.2.1 Chemical substances standard in procured products Eliminated "limited substances"; added <i>Special examples for batteries and Precautions when using polyvinyl chloride to Prohibited Substances</i>; added <i>Restricted substances in packaging</i>; and added <i>Restricted substances in equipment and tools</i>. • 3.2.2 <i>Chemical substances standard in manufacturing processes</i> was revised to include hexavalent chromium as a controlled chemical substance. • Added further detail to 2. <i>Scope</i> and 3.1 <i>Requirements for environmental management systems</i> • Added new section: 7. <i>Handling of information from all suppliers</i> |
| Oct. 1, 2008 | 3.1 | <ul style="list-style-type: none"> • 3.1.2 Establishment of environmental impact substances management system <ul style="list-style-type: none"> • Added 8. <i>traceability</i> to Table 1: <i>Environmental impact substances management system</i> • 3.2.1 Chemical substances standards in procured products <ul style="list-style-type: none"> • Added 17. <i>Perfluorooctane sulfonates (PFOSs)</i> to Table 2: <i>Prohibited chemical substances in procured products and their threshold amount</i> • Added (5) <i>About perfluorooctane sulfonates (PFOSs)</i> • Added further detail to Table 3: <i>Examples of uses of PVC</i> • Revisions to (6) <i>Applications exempted by the prohibited substances standards: The use of Deca BDE in polymeric applications</i> • Added new exemptions from prohibition to (6) <i>Applications exempted by the prohibited substances standards: The use of Deca BDE in polymeric applications: a) Cadmium and its compounds and c) Lead and its compounds</i> |
| Aug. 1, 2010 | 3.2 | <ul style="list-style-type: none"> • Added another type of procured product to 2. <i>Applicable Scope</i> • Added 3. <i>Definition of Terms</i> • Added <i>Management System of Chemical Substances in Products</i> to 4.1.2. <i>Establishment of Management System of Chemical Substances in Products</i> • Changed the names of types of chemical substances in 4.2 <i>Requirements for environmental impact chemical substances</i> • Updated (6) <i>Exempted applications where prohibited chemical substances in products are allowed to be used</i> in 4.2.1. <i>Chemical substances standards in products</i> 1) <i>Prohibited chemical substances in products</i> • Changed the number of phthalate compounds from three to six, and added a provision regarding SVHC under the EU REACH Regulation in 4.2.1. <i>Chemical substances standards in products</i> 2) <i>Controlled chemical substances in products</i> • Upgraded Annex 5: <i>Class I Specified Chemical Substances under Japanese Act on the Evaluation of Chemical Substances and Regulation of Their Manufacture, etc.</i> |
| Apr. 1, 2012 | 3.3 | <ul style="list-style-type: none"> • Added another type of procured product to 2. <i>Applicable Scope</i> • Added another 6 substances to Table 1: <i>Prohibited chemical substances in products and their threshold amount</i> in 4.2.1. <i>Chemical substances standards in products</i> 1) <i>Prohibited chemical substances in products</i> • Deleted Annex 2: <i>Nikon Green Procurement Standards Agreement</i> • Added Annex 3: <i>Exempted applications where prohibited chemical substances in products are allowed to be used</i> • Added Annex 4: <i>Exempted applications where prohibited chemical substances in products for medical, monitoring and control equipment are allowed to be used</i> • Added Annex 5: SVHC's in REACH |
| Mar.1, 2013 | 3.4 | <ul style="list-style-type: none"> • Added notes *6 and *7 in 4.2.1. <i>Chemical substances standards in products</i> 1) <i>Prohibited chemical substances in products</i>. • Updated Annex 3: <i>Exempted applications where prohibited chemical substances in products are allowed to be used</i> and Annex 5: SVHC's in REACH. |

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|---------------|-----|---|
| April 1, 2014 | 4.0 | <ul style="list-style-type: none"> • Made "Separate Volume: Corresponding Chemical Substance Lists" a separate document (removed the data that related to chemical substance) • Moved the policies to the back cover • Changed the structure to Section 1 "Nikon Green Procurement Standards", Section 2 "Requests to Suppliers", Section 3 "Evaluation and Measures" • Removed "Definition of Terms" • Added "2. Basic Philosophy Regarding Green Procurement" in Section 1. • Added "4.2 Environmental impact chemical substances" in Section 1 • Added "2.1.2 Observance of Environmental Regulations Applicable to the Work Location" and "2.2.2 Compliance with Regulations Related to Chemical Substances" to Section 2, "2. Requests Related to the Environmental Management System" • Added "2.3 Efforts in the Supply Chain" to Section 2 • Added a detailed explanation to "2.4 Cooperation to the Environmental Management System Audit" in Section 2 • Added "3.1 Regulatory Compliance for the Document "Separate Volume: Corresponding Chemical Substance Lists" in Section 2 • Added "3.5 Change Control" in Section 2 • Added "3.6 Non-conformity response" in Section 2 • Added "1.2 Nikon Environmental Partner" in Section 3 • Added "Appendix 3: Establishment and Operation of a Management System" • Added "Appendix 4: Basic Management System of Environmental Conservation" • Added "Appendix 5: Guidelines for the Management of Chemical Substances in Products (Version 3.0)" |
| April 1, 2015 | 4.1 | <ul style="list-style-type: none"> • Amended "(2) Procured products, 3) Packaging" in "3. Applicable Scope" in Section 1 |
| April 1, 2018 | 4.2 | <ul style="list-style-type: none"> • Removed (2) and changed part of (1) in "2.1 Selection of Procurement Items" in Section 1 • Integrated "4.2.2 Regulatory Compliance for Packaging Materials" to "4.2.1 Regulatory Compliance for Products" and renamed as "4.2.1 Regulatory Compliance for Procurement Items" in Section 1 • Integrated "3.2. Submission of a Non-use Guarantee" to "3.3. Cooperation to the Survey of Environmental Impact Chemical Substances" and renamed as "3.2 Cooperation to the Survey of Chemical Substances" in Section 2 • Changed part of words in "2. Evaluation and Cooperation Related to Environment Impact Chemical Substances" in Section 3 • Updated "Appendix 1: Group Companies" as of March 1, 2018 • Removed "Appendix 2: Non-use Guarantee (Example)" • Replaced the Nikon Basic Environmental Management Policy with the Nikon Environmental Activity Guidelines • Updated the Nikon Basic Procurement Policy to the latest version |
| April 1, 2020 | 4.3 | <ul style="list-style-type: none"> • Changed "2.1 Selection of Procurement Items" of "2. Basic Philosophy Regarding Green Procurement" in "Section 1: Nikon Green Procurement Standards" • Changed "(2) Procured products 1) Finished products, 2) Parts and materials" of "3. Applicable Scope" in "Section 1: Nikon Green Procurement Standards" • Added "(3) Exemption" to "3. Applicable Scope" in "Section 1: Nikon Green Procurement Standards" • Added a note on separate requests described in "3.1 Regulatory Compliance with the Document "Separate Volume: Corresponding Chemical Substance Lists"" of "3. Requests Regarding Environmental Impact Chemical Substances" in "Section 2: Requests to Suppliers" • Added "3.3 Cooperation to the Prevention of Tampering and Contamination in Processes" to "3. Requests Regarding Environmental Impact Chemical Substances" in "Section 2: Requests to Suppliers" • Updated "Appendix 1: Group companies" • Updated "Appendix 4: Guidelines for the Management of Chemical Substances in Products" |
| Nov. 1, 2021 | 4.4 | <ul style="list-style-type: none"> • Added "2.4 Cooperation to the Environmental Management System Survey" in "Section 2: Requests to Suppliers" • Updated "Appendix 1: Group companies" |

Nikon Environmental Activity Policy

In accordance with Nikon's corporate philosophy of "Trustworthiness and Creativity," we are committed to conducting all of our businesses based on the following policy goals for the purpose of passing on a healthy environment that serves as a base for a sustainable society to future generations.

* Nikon collectively means Nikon Corporation and the Nikon group companies.

We recommend our affiliated companies to follow this or an equivalent policy.

●Effective use of resources

We will promote energy conservation as well as reduction, reuse, and recycling of resources including water and raw materials in order to reduce our environmental burdens such as greenhouse gases and waste.

●Environmental considerations for products

We will perform environmental and safety assessments, including those to conserve biodiversity, at every stage of planning, development and design in order to provide products that fully comply with our environmental protection aims and objectives.

●Environmental considerations throughout product life cycles

We will develop eco-friendly technologies and actively introduce materials and equipment at every stage of product life cycles (production, distribution, use, disposal, etc.) in order to minimize our environmental burdens.

●Compliance with related laws and other requirements

We will develop and follow rigorous code of standards, comply with all relevant environmental conservation treaties, international and regional laws and regulations as well as responding to requests from stakeholders.

●Prevention of environmental pollution

We will cautiously use chemical substances to minimize health, safety, and environmental risks and strive to prevent environmental pollution.

●Collaboration with stakeholders

We will participate in environmental protection programs, including addressing climate change issues and conserving biodiversity in cooperation with our stakeholders. We will also actively disclose and provide information to stakeholders and work together to reduce our environmental burdens.

●Education

We will conduct ongoing education programs to raise environmental awareness of our employees and promote their involvement in environmental activities.

● **Continuous improvement**

To achieve the above goals, we will set environmental objectives and targets and strive to meet them and reduce our environmental burden through continuous improvement of our environmental management system and work efficiency.

Nikon Basic Procurement Policy

Our approach is that our suppliers and Nikon are partners working together to build a better society with our products and solutions. Under this approach, we work to understand each other, build a relationship of trust, and prosper together.

1. Sustainable corporate activities

Nikon shall conduct sustainable and fair corporate activities, while not only complying with applicable laws and accepted social norms, but tackling social issues such as forced labor, child labor, and environmental destruction.

Nikon shall also encourage socially responsible behavior within its supply chain.

2. Open-door procurement

Nikon procures products and solutions from global suppliers in as transparent a fashion as possible.

3. Procurement based on the concept of fair competition

Based on the principles of fair and free competition, Nikon assigns top priority to suppliers that offer superior performance in terms of quality, cost, delivery, technology, and corporate reliability that includes social responsibility initiatives.

* "Nikon" refers to "Nikon Corporation and its domestic and overseas subsidiaries." Affiliates are encouraged to follow these Guidelines or to implement similar standards.
Nikon shall also encourage socially responsible behaviour within its supply chain.