

1. Increase Shareholder Value through Proper Tax Reporting

The Nikon Group believes taxes greatly impact the development of local communities and that it is an important societal obligation for companies to pay their fair share of taxes. From this perspective, we aim to increase shareholder value by filing proper tax returns and paying the appropriate level of taxes.

2. Ensure Tax Compliance

The Nikon Group will seek to understand and comply with the laws and regulations of Japan and other countries, as well as the intentions of guidelines issued by international organizations such as the OECD. We will also strive to understand the intent of the tax laws, including revisions of tax regulations and seek proper counsel from third party experts in the event we need clarity on any issues.

3. Leverage Tax Incentives and Eliminate Tax Avoidance

The Nikon Group will actively take advantage of tax incentives given we understand their intended purpose and have assessed whether our business objectives and operations are suitable for such incentives.

We will not engage in any activities that are solely for tax avoidance and have no commercial purpose. In addition, we will not make use of any jurisdictions or so-called tax haven countries that have significantly lower tax rates compared to those of other jurisdictions we operate in for tax avoidance.

4. Prevent Double Taxation related to Transfer Pricing and Other Tax Issues

The Nikon Group will adhere to the transfer pricing arm's length principle. Based on the OECD Transfer Pricing Guidelines, we will evaluate the interpretations by each country and reduce transfer pricing risks to acceptable levels.

Where there is a possibility of double taxation, we will strive to eliminate double taxation in accordance with the procedures permitted by the laws of each country and tax treaties.

5. Build Constructive Relationships with Tax Authorities

The Nikon Group will engage with the tax authorities in Japan and other countries in a timely and appropriate manner, respond and cooperate in good faith during tax audits and consider necessary measures to prevent the recurrence of the issues raised.

6. Maintain Tax Governance Structure

To ensure proper compliance with the above principles, the Nikon Group will maintain an internal control structure to manage tax compliance and tax risks for the entire group under the responsibility of the CFO, who is an Executive Director of the company.

To maintain the internal control structure, we will do our best to ensure our employees have the appropriate level of tax knowledge through internal training and other programs.

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