

## Introduction

The Nikon Code of Conduct (the “Code of Conduct”) establishes the baseline position of Nikon Corporation and its subsidiaries worldwide on fulfilling their corporate social responsibilities (CSR), and sets the core standards of behavior and conduct for all directors, officers, and employees of these organizations (“Personnel”). Nikon Corporation’s Sustainability Policy establishes the company’s commitment to contributing to social sustainability and pursuing sustainable growth by embodying Nikon’s corporate philosophy of “Trustworthiness and Creativity.” To implement this Policy all Personnel must strive to conduct themselves in a sincere manner with utmost integrity and professionalism. The Code of Conduct should be recognized as a guide in that it may not address every situation and is intended to help Personnel make the right decisions in their work activities.

## Scope

The Code of Conduct applies to all directors and officers, as well as employees (of any category) and contractors. “Nikon” as mentioned in the Code of Conduct refers to the Nikon Corporation and all of its subsidiaries worldwide, and “we,” “us” or “our” refers to all Personnel of Nikon.

## 1. Responsibility

- We are responsible for adhering to the Code of Conduct and any policies regarding behavior and conduct that have been established by the company by which we are employed, and complying with applicable laws while conducting business for or acting on behalf of Nikon. We must conduct Nikon's business activities and operations ethically and in the best interest of Nikon.
- Each director, officer, manager and supervisor of Nikon maintains a responsibility to engage in their work objectively and fairly, and to actively promote communication at all levels within Nikon, and has the responsibility of being a positive role model who is expected to lead by example and to encourage others within Nikon to embrace the principles of the Code of Conduct. Each director, officer, manager and supervisor of Nikon also has a responsibility to help employees understand the Code of Conduct.

### Our principles

Each and every employee plays an important role in supporting the Nikon brand. For Nikon to continually grow by building unwavering trust and credibility and by providing new value as a global company, we must not only follow all applicable laws, regulations and company rules, but also ensure our actions are in line with the Code of Conduct. Personnel will perform their duties in an organized and efficient manner in observance with the applicable decision standards that define the responsibilities and authorities of all Nikon organizations and Personnel positions.

### What this means for us

We will:

- Thoroughly read and comprehend the Code of Conduct.
- Participate in training on the Code of Conduct organized by Nikon.
- Follow the Code of Conduct as we engage in daily work duties.
- Follow corporate and organizational decision-making authority rules concerning approval and reporting procedures while performing the duties of their position.
- Ask a superior whenever a question arises.
- Immediately report any violation or suspected violation.

Every organization head will:

- Consistently demonstrate commitment to achieving results using correct, appropriate, ethical and lawful methods.
- Respond appropriately and in good faith to requests from subordinates for consultations, reports, questions, or approval, and similar requests, and when necessary, report to or ask for approval from a superior in accordance with the company rules.
- Strive to create a workplace where employees can openly discuss matters and share their opinions.
- Whenever a problem occurs in the workplace, address the problem immediately after checking the facts, and when necessary, consult with the responsible department(s).

## 2. Respect for Human Rights

- Nikon recognizes international standards of conduct regarding human rights and respects human rights. Nikon will not commit any human rights violations, including **forced labor** <sup>(1)</sup> or **child labor** <sup>(2)</sup>.
- Nikon will not commit any human rights violations itself, nor will it be complicit in violations by third parties, and it will assess human rights risks in its business activities as part of its ongoing efforts to prevent and mitigate all identified negative impacts.
- We will respect every personality and all characteristics, and we will strive not to engage in any act that impairs individual dignity. We will not engage in, nor instigate any action that violates human rights.
- We will require our suppliers and business partners to not engage in actions that violate human rights.

### Our principles

- Nikon will tackle human rights issues sincerely as a responsible global company.
- Forced labor and child labor are serious human rights issues. Nikon will put in place sufficient measures to prevent such forms of labor in its value chain.

### **Explanation of terms**

**(1) Forced labor** is any work or service that is exacted from individuals under the menace of any penalty, and for which those persons have not offered themselves voluntarily. This means that even the labor of workers who are provided wages or compensation may still be considered forced labor. Any situation where workers are unable to quit because their passport or personal identification document is confiscated by their employer or because they are levied an unreasonably large debt by their employer is considered forced labor, even if they are paid wages.

**(2) Child labor** generally refers to labor involving children under the age of 15.

### **What this means for us**

We will:

- Respect the human rights of all people during the course of business activities.
- Always be mindful of whether our own words and actions violate another person's human rights.
- Respect one another's character and individuality in all communications, and engage one another with a fair attitude.

### **Group policies related to this chapter:**

Nikon Human Rights Policy

### 3. Sound Working Environment

- Nikon will 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 and regions in which Nikon operates.
- Nikon will deepen the understanding of Diversity, Equity & Inclusion (“DEI”) as a fundamental ethos, and will foster working environments where the characteristics and abilities of all team members are accepted and valued.
- Nikon will ensure fairness and equity in work situations, including recruitment and selection, compensation and benefits, and professional development and training, as well as commit to the ongoing development of a work environment where employees can make the most of their unique talents and strengths.
- Nikon will have zero tolerance for any behaviors that impair someone’s individual dignity or personality. These behaviors include discrimination based on the characteristics and differences that exist within each one of us, such as age, gender, nationality, race and ethnicity, religion, beliefs, sexual orientation, gender identity, disability, or background, as well as slanderous behavior, violence, bullying, or any form of **harassment** <sup>(1)</sup> (collectively “Discrimination and Harassment”).
- Nikon will strive to improve the health of its Personnel and prevent occupational accidents.
- Nikon will comply with the applicable laws and regulations regarding the working hours in each country and region where Nikon operates, and will strive to prevent long work hours.

#### Explanation of terms

- (1) **Harassment** generally means a range of unacceptable behaviors and practices, or threats that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, including gender-based harassment and workplace bullying, etc.

### Our principles

- Nikon respects the diversity of its employees and strives to create a working environment where all employees can make the most of their unique talents and strengths. We believe that creating an open working environment where employees respect one another and can freely share their values and views will enhance Nikon's competitiveness.
- Based on the belief that a working environment where employees can work safely and maintain their physical and mental health will enrich their personal life and improve workplace vitality and productivity, Nikon carefully manages safety and also helps employees to maintain and improve their own health.

#### **Group policies related to this chapter:**

Nikon Global Diversity, Equity & Inclusion Policy

### What this means for us

We will:

- Recognize the influence that unconscious bias and assumptions can have, and intentionally listen to opinions different from our own.
- Never engage in acts of Discrimination and Harassment, and if such acts are discovered to have occurred, promptly report them to our supervisor, the human resources department or the reporting/consulting office of that company.
- Observe rules and procedures concerning health and safety established by that company, and if a work process, operation of equipment or workplace is discovered to be hazardous or toxic, promptly report to our supervisor or the department in charge of work safety of that company, and strive to ensure the situation is not neglected.
- Strive to improve our own health as individual Personnel, actively participate in health and safety activities and training conducted by that company, and make a concerted effort to create working environments with open communication.

### 4. Protection of the Natural Environment

- Nikon will take part in business that contributes to reducing the environmental impact of society and our customers. To contribute to achieving social sustainability, Nikon will strive to reduce its environmental impact at all stages of its business activities, including raw material procurement and product development, design, manufacturing, distribution, sales, usage, services, and disposal, and will endeavor to provide environmentally friendly products and services.
- Nikon will strive to foster better environmental impact awareness among Personnel.
- Nikon will help work towards achieving a decarbonized society by making efforts to reduce greenhouse gas emissions through energy conservation and the adoption of renewable energy throughout the value chain.
- Nikon will help achieve a resource circulating society by making effective use of resources in its business activities, including reducing waste and water consumption. We will also strive to reduce resource usage and reuse and recycle resources throughout products' entire life cycles.
- Nikon will strive to achieve a healthy and environmentally safe society by managing the chemical substances used in its products and production processes, and will otherwise manage operations according to voluntary standards that may be at least as strict, and sometimes even be stricter, than those of the laws and regulations applicable in the countries and regions in which it does business. We will also strive to preserve ecosystems by ascertaining and minimizing our impact on them.

## Our principles

Climate change, resource depletion, environmental pollution and biodiversity loss are becoming serious global issues. During the course of its business activities, Nikon consumes energy and resources, while also impacting the environment in various ways, including the release of gases, water and waste. Recognizing this, Nikon will work to reduce greenhouse gases, provide eco-friendly products, and conduct eco-friendly business activities, such as the sustainable procurement and use of resources, in order to help mitigate the impact we and society have on the environment. Nikon will also endeavor to create new businesses and innovations that reduce environmental impacts.

### **Group policies related to this chapter:**

Nikon Long-term Environmental Vision  
Nikon Paper Procurement Policy  
Nikon Basic Green Procurement Policy  
Nikon Environmental Activity Policy  
Hazardous Chemical Substances Guideline

## What this means for us

We will:

- Adopt an environmental perspective and continuously seek ways to reduce environmental impact in every individual's day-to-day operations, as well as take proactive actions.
- Strive to reduce waste and make effective use of energy, water, and other resources as much as possible in our individual workplaces.
- Conserve energy, practice the 3Rs (reuse, reduce, and recycle), and work to prevent environmental pollution in operations that include procurement, product development and design, production and distribution, and sales and services.
- Comply with environmental policies and internal rules, and promptly report possible violations of applicable environmental laws or rules.

## 5. Operation Practices

### (1) Anti-Bribery and Corruption

- Nikon has a zero tolerance approach against bribery and will make every effort to prevent bribery.
- We will avoid behavior that may raise suspicions of bribery.
- We will commit to being a responsible corporate citizen wherever Nikon operates or conducts business by maintaining sound and sincere relationships with public authorities and public officials, complying with applicable laws and regulations, and by avoiding corruption.

#### Our principles

Bribery is unacceptable. It prohibits open competition and inhibits the sound socioeconomic development of countries and regions. Many countries around the world have laws and regulations in place that prohibit bribery of public officials and those equivalent to public officials (collectively “Public Officials”) as well as of individuals or organizations in the private sector. Nikon prohibits bribery in every country and region where it operates and promotes activities to prevent bribery before it occurs. Additionally, if third parties working for, or on behalf of, Nikon (distributors, agents, consultants, etc.) engage in bribery, Nikon could also be held legally liable. Therefore, third parties must be managed accordingly.

## What this means for us

We will:

- Never offer, directly or indirectly, any form of gift, benefit or anything of value to anyone for the purpose of:
  - Obtaining or retaining business,
  - Influencing business decisions, or
  - Securing an unfair advantage.
- Never **offer bribes** <sup>(1)</sup> directly, or through third parties.
- Investigate all third parties thoroughly before engaging their services and manage them in accordance with company rules on bribery prevention.

### Explanation of terms

**(1) Offering bribes** is the giving of, or promise to give, money, benefit or other advantage, either directly or indirectly, in exchange for an improper advantage for Nikon or Nikon employees.

### Group policies related to this chapter:

Nikon Anti-Bribery Policy

## 5. Operation Practices

### (2) Entertainment and Gifts

- Whenever we conduct business for Nikon, we will comply with applicable laws and regulations as well as Nikon's policies regarding the giving and/or receiving of **entertainment**<sup>(1)</sup> and/or gifts to and/or from customers, suppliers, business partners and others doing or seeking to do business with Nikon. We will only participate in business entertainment and the giving and receiving of gifts to the extent necessary and reasonable under business norms, and will consult our supervisor if in any doubt about whether such behavior is appropriate.
- We will not provide entertainment and/or gifts to a customer or others doing or seeking to do business with Nikon in exchange for assistance or influence, or upon the understanding that such assistance or influence has been or will be rendered in connection with any business transaction affecting Nikon. We will not accept entertainment and/or gifts from suppliers, business partners or others doing or seeking to do business with Nikon under circumstances which may be interpreted as potentially influencing a decision regarding a business transaction involving Nikon.
- As to entertainment and/or gifts provided or received, we will report and follow any standards of conduct set forth in policies specific to the Nikon company by which we are employed.

#### Explanation of terms

- (1) Entertainment** means acts that provide a friendly reception to another party, such as meals, parties, sporting events, concerts and rounds of golf.

### **Our principles**

Entertainment and/or gifts may be offered on occasion to maintain and promote amicable ties or as part of information gathering activities.

However, excessive entertainment and/or personal gifts could be seen as a request for improper influence, which could negatively affect Nikon's credibility with society. Nikon prohibits the offering or receiving of entertainment and/or gifts to gain an unfair advantage or request in return.

### **What this means for us**

We will:

- Not provide or receive entertainment and/or gifts which may be seen as intended to influence a business decision involving Nikon.
- Check company bribery prevention rules or guidelines regarding limits on monetary value and the frequency and timing with which entertainment and/or gifts are given before giving or receiving entertainment and/or gifts.
- Request approval for the giving or receiving of entertainment and/or gifts from a superior beforehand, or report the same ex post facto, in accordance with company bribery prevention rules or guidelines, and the superiors approve or deny requests in accordance with company rules and standards.
- Accurately account for all entertainment and/or gifts given or received.

#### **Group policies related to this chapter:**

Nikon Anti-Bribery Policy

## 5. Operation Practices

### (3) Relationship with Suppliers and Business Partners

- We will select suppliers and business partners appropriately and fairly based on quality, cost competitiveness, lead time, and other objective criteria. We will base Nikon's relationships with suppliers and business partners on lawful, efficient and fair practices.
- We will not exploit Nikon's position in business relationships by forcing onto suppliers and business partners unethical conditions or disadvantages by engaging in fraudulent activities, or by seeking personal gain.
- Nikon expects all of its suppliers and business partners to adhere to the terms and conditions of its contractual agreements and to be in compliance with all applicable laws and regulations of the countries in which they operate.

#### Our principles

Nikon works with its suppliers and business partners to provide products and solutions that benefit society. This relationship must never represent a conflict of interest. Suppliers and business partners include all companies involved in Nikon's value chain. Furthermore, Nikon must also consider the ethical behavior of the upstream companies in its supply chain in the countries where they operate.

### **What this means for us**

We will:

- Select suppliers based on a fair comparison/evaluation using objective criteria with regard to various conditions including price, technology, quality, delivery time, stability of supply, and services.
- Understand a more advantageous position of purchasing/outsourcing parties than that of selling/undertaking parties in general, and not demand entertainment and/or gifts, nor make requests for personal gain, using such an advantageous position.
- Carefully scrutinize the fairness and transparency of our dealings with suppliers.
- Make efforts to build trusting relationships with our business partners on a daily basis to ensure stable procurement.

### **Group policies related to this chapter:**

Nikon Basic Procurement Policy  
Nikon CSR Procurement Standards  
Nikon Basic Green Procurement Policy  
Nikon Green Procurement Standards  
Nikon Environmental Activity Policy  
Hazardous Chemical Substances Guideline

## 5. Operation Practices

### (4) Social Responsibility in the Supply Chain

As part of Nikon's effort to promote socially responsible behavior within Nikon's supply chains, we expect all Nikon suppliers and business partners to hold themselves to the same standards of behavior and conduct as Nikon holds for itself as set forth in the Code of Conduct.

We also expect our suppliers and business partners to uphold the core standards set out in this Code of Conduct including policies of Nikon concerning compliance with all applicable laws, respect for human rights, working environment, protection of natural environment and the safety and security of products and services.

#### Our principles

Nikon must fulfill its responsibilities to society in all aspects of the products and services it offers. This is because companies play a larger role in resolving social issues due to economic globalization and the fact that some issues cannot be resolved by government alone. Nikon is committed not only to its suppliers and business partners, but also to society as a whole.

### **What this means for us**

We will:

- Take action to understand our social responsibilities and roles in the supply chain with regard to Nikon's products and services.
- The department involved in purchasing and procurement transactions must understand and act in accordance with the Nikon Basic Procurement Policy and various other applicable standards, and endeavor to communicate and ensure compliance of these standards with suppliers and business partners.
- Understand Nikon's approach and respond accordingly to inquiries we may receive from outside Nikon, including those from customers, in departments not involved in purchasing/procurement.

### **Group policies related to this chapter:**

Nikon Basic Procurement Policy  
Nikon CSR Procurement Standards  
Nikon Basic Green Procurement Policy  
Nikon Green Procurement Standards  
Responsible Minerals Sourcing Policy  
Nikon Environmental Activity Policy  
Hazardous Chemical Substances Guideline

## 5. Operation Practices

### (5) Lobbying and Political Donations

Nikon will comply with all applicable laws relating to **lobbying**<sup>(1)</sup> and political donations in the countries in which Nikon operates.

#### Our principles

Most countries have their own strict laws and regulations regarding lobbying and political donations. Nikon will confirm and comply with these laws and regulations.

#### What this means for us

We will:

- Have our local legal department confirm applicable laws and regulations before we lobby or make political donations in any country.

#### **Explanation of terms**

**(1) Lobbying** refers to private activities carried out by an individual or organization for the purpose of political influence.

## 5. Operation Practices

### (6) Fair Competition and Business Transactions

- Based on the principle of fair and open competition, we will compete vigorously in the marketplace, and do so by fully complying with the antitrust and other competition laws wherever we do business for Nikon.
- We will not enter into any agreement whether formal or informal, written or verbal, with a competitor that sets prices of products or services, allocates markets or customers, eliminates competition, or otherwise unreasonably restrains trade.
- We will honor Nikon's contracts with its customers, suppliers and business partners by adhering to the terms of these contracts.

#### Our principles

Fair and free market competition results in higher quality products and services, better prices, and social development. Inappropriate restrictions on fair and free competition are prohibited by the competition laws of all countries (these laws may be known as antimonopoly laws or antitrust laws in some countries). Nikon does not tolerate any action that violates domestic and international competition laws.

## What this means for us

We will:

- Be cautious when exchanging information with competitors, and never engage in activities that lead to a suspicion that we are part of, or involved with, **a cartel** <sup>(1)</sup> .
- Ensure that departments that deal with external forces or third parties understand and comply with the basic requirements of all applicable laws and regulations, and that they are able to identify business practices that may be considered illegal.
- Never interfere with retailer pricing because prices are determined by market forces.
- Never make decisions when even the smallest questions or concerns arise without consulting the legal department because competition law is a very complicated field that requires dedicated education and experience.

## Explanation of terms

**(1) A cartel** (illegal business association) is an association of independent businesses with the purpose of effectively limiting competition in a certain field of business by mutually restraining business activities through following means:

- Price fixing (price cartel).
- Limitation of production or supply (supply cartel).
- Restriction of customers (customer restriction cartel).

## 5. Operation Practices

### (7) Import and Export Control

When we conduct international transactions, whether they involve hardware and software such as our products or components or technical information, we will comply with the applicable laws and regulations related to the export, re-export and import controls, and make true declaration to the appropriate authorities.

#### Our principles

Nikon will comply with relevant laws and regulations in concerned countries and regions in order to maintain international peace and security through Security Export Control. With regard to imports, Nikon will fulfill its tax obligations as a member of society through proper reporting and declaration, in addition to complying with the applicable laws and regulations of each country and region.

#### What this means for us

We will:

- Conduct business transactions only after receiving approval based on a customer/business inquiry screening if any doubt with regard to security export control arises, even for long-standing customers with whom we've dealt in the past or customers from which orders have already been received.
- Confirm that the export destination is not prohibited by security trade control or the subject of economic sanctions, if it is known the items will be exported through a domestic business partner, even if the transactions are made domestically.
- Abide by relevant laws and regulations on imports and exports and report prices accurately.

## 5. Operation Practices

### (8) Taxation

Nikon acts as a responsible global corporate tax citizen in compliance with applicable tax laws and regulations. We seek and encourage an open and honest dialogue between tax authorities and business, and make efforts to resolve issues in case our opinions differ from those of the tax authorities.

#### **Our principles**

As a responsible tax payer in all countries and regions in which it operates, Nikon will pay all taxes due in accordance with the laws of each country and region. Nikon will also cooperate with regular audits carried out by tax authorities.

#### **What this means for us**

We will:

- Check to be sure that transactions and dealings carried out in the course of daily business operations are in compliance with the tax laws of that particular country or region.
- During tax audits, we will answer auditors' questions truthfully.

#### **Group policies related to this chapter:**

Global Tax Policy

## 5. Operation Practices

### (9) Insider Trading Prevention

We will not engage in trading of securities based on material confidential information not available to the general public.

#### Our principles

Employees may receive information concerning Nikon or other listed companies through the course of their work before that information is made public. Employees must not buy or sell securities directly or indirectly based on such information. Doing so is considered insider trading and is prohibited by law. Nikon will strive to prevent insider trading.

#### What this means for us

We will:

- Never trade the stock of Nikon or other companies based on **material nonpublic information**<sup>(1)</sup>, recommend others to do so, or provide others with information not available to the public.
- Keep Nikon's information confidential except when work duties require that information be disclosed, and will not disclose information to third parties without prior permission.

#### **Explanation of terms**

(1) The followings are considered examples of **material nonpublic information**:

- Financial information.
- R&D information regarding new products or technologies.
- Information regarding mergers with, or acquisition of, other companies or the transfer of business(es).

## 5. Operation Practices

### (10) Proper Use and Management of Nikon Property

We will be responsible for the proper use and management of Nikon's assets including its facilities, equipment, funds, inventory, products, information, intellectual property and software, and will take all reasonable steps to ensure that Nikon's assets are protected from loss, destruction, theft, damage, or misuse. We will not use Nikon's assets for private or fraudulent purposes.

#### Our principles

Nikon owns assets of value that are indispensable to its business activities, including facilities, equipment, cash, inventory, and intellectual properties. Nikon will manage these assets appropriately to prevent their loss, theft, or fraudulent use, and use them only for the intended business purpose. Nikon will manage and use these assets responsibly and correctly record them in accounting ledgers to ensure the reliability of its financial reporting.

#### What this means for us

We will:

- Not use Nikon's assets for our own personal benefit or that of others. We will fully recognize the importance of Nikon's assets on a daily basis and carefully manage and use them in accordance with company rules in order to prevent their loss, damage, or theft.

## 5. Operation Practices

### (11) Protection of Intellectual Property Rights

- We will recognize that Nikon's intellectual property, such as its patents, **design patents**<sup>(1)</sup>, **trademarks**<sup>(2)</sup>, copyrights and trade secrets, is an invaluable asset to Nikon that must be safeguarded at all times. We will cooperate in establishing, protecting and utilizing Nikon's rights in its intellectual property. We will not permit any third party the right to use Nikon's intellectual property without proper authorization and license from Nikon.
- We will respect the intellectual property rights of third parties and will not infringe upon or improperly use their intellectual property, such as its patents, design patents, trademarks and copyrights. We will obtain intellectual property information from third parties using legitimate and appropriate methods.

#### Our principles

Intellectual properties represent an important asset for ensuring the competitive advantages and prosperity of Nikon's businesses. Nikon will obtain, maintain and utilize intellectual properties in a legal and strategic manner. Nikon will take a resolute stance against the actions of others that infringe upon our intellectual property rights in accordance with relevant laws and regulations. In addition, Nikon will respect the intellectual property rights of others and take due care so as not to infringe upon these rights.

#### **Explanation of terms**

- (1) **Design patents** include the external design of a product such as a camera, but it may also refer to the design of parts of a product, such as the red motif on the camera grip or the way images are displayed in a product's LCD monitor. Also, the design of product packaging can be subject to design rights.
- (2) **Trademarks** are used for products and services and may include not only letters, illustrations and symbols, but also three dimensional shapes, colors and sounds. For example, the Nikon logo and NIKKOR product name, and the name of services such as Nikon School, are trademarks.

## **What this means for us**

We will:

- Strive to carry out the legal and strategic acquisition, maintenance and utilization of intellectual properties and to take necessary actions to achieve this end.
- Never infringe upon the intellectual property rights of others. When unsure of how to deal with intellectual properties, we will not act before consulting with the appropriate department within the Nikon Group.

### **Group policies related to this chapter:**

Nikon Group Basic Intellectual Property Policy  
- (Group IP Policy)  
Trademark Handling Rules

## 5. Operation Practices

### (12) Sound Communication

- We will provide truthful and accurate information in our publication, advertising, marketing, and promotional activities. We will comply with the applicable laws of each country and region, strive to make advertisements, copy and displays that are accurate, easy-to-understand, and do not cause misunderstanding, and take no action that may unfairly deceive customers or mislead them to choose the incorrect or inappropriate products or services.
- Nikon will not disseminate any information that infringes on the intellectual property rights of others.
- Nikon will also strive to avoid advertising in media whose content is highly likely to undermine public order and morality or have a negative impact on society.

#### Our principles

Sharing information in a sincere and accurate manner is indispensable for retaining trust in, and maintaining and enhancing the value of the Nikon brand. In addition, we aim for ethical communication that shows respect for the rights of others.

## **What this means for us**

We will:

- Abide by the applicable laws and regulations of each country and provide information that is accurate and does not lead to misunderstanding, or an overly positive impression, of actual functions and features when sharing information on products and services.
- Be diligent to ensure in advance that the rights of others, including human rights, copyrights, and portrait rights, are not violated or infringed upon before publishing or engaging in any promotional activities.
- Stay knowledgeable and up to date on media formats and ensure to not advertise with media outlets affiliated with illegal or unethical practices.
- As pertains to public relations activities, pay careful attention so as to eliminate relationships with media outlets suspected of connections with illegal or unethical practices and strive to decline interviews from such outlets.

## 5. Operation Practices

### (13) Appropriate Management of Personal and Confidential Information

- We will take every reasonable precaution to safeguard confidential information. The obligation to protect confidential information will continue even after employment with Nikon ends. We will not use such confidential information for our personal purposes.
- We will process personal information, in a fair and lawful manner, in accordance with specified purposes or further in accordance with applicable law.
- We will manage business information including personal information appropriately in accordance with the applicable degree of confidentiality to avoid loss and unauthorized disclosure.

#### Our principles

One of Nikon's most important responsibilities to society is handling all information assets in an appropriate manner. This is also essential for Nikon to earn the trust of customers and grow as a company. There are a growing number of opportunities for Nikon to acquire and use the personal and confidential information of its customers. The consolidation of information and increasing number of people authorized to access this information raise the risk of information leaks. Nikon will work rigorously to prevent information leaks. Nikon will follow related laws, regulations and company rules and respond immediately in the event of a leak of customer information or other confidential information.

## **What this means for us**

We will:

- Comply with company rules, as well as applicable laws and regulations, on information security.
- Attend training on information security and acquire skills and knowledge necessary for safeguarding information.
- Implement information security measures as instructed by Nikon.
- Manage personal and confidential information rigorously so as to prevent the leak or loss of this information.
- Immediately report to a superior and the information security department and strive to prevent re-occurrences whenever an information security incident does occur.
- Make doubly sure that our post does not result in the leaking of confidential company information when using social media for business or even personal use.

## **Group policies related to this chapter:**

Nikon Group Information Security Policy  
Nikon Group Information Management Rules  
Nikon Group Privacy Protection Statement  
Nikon Group Personal Data Processing Rules  
Nikon Group Social Media Policy

## 6. Factual Information Disclosure

- Nikon will carry out accurate accounting processing based on facts to fulfill Nikon's tax and other legal obligations.
- Nikon will not engage in inappropriate accounting practices to secure profits, achieve sales budgets, fulfill budgeted expenses, or for any other reason.
- Nikon will keep accounting records of all business transactions in accordance with proper accounting standards, and will disclose accurate information in a timely and appropriate manner.
- Nikon will appropriately manage and actively disclose non-financial information, including ESG (Environment, Social, and Governance) information.
- We will accurately prepare and store documents and data, and will never engage in their falsification, fabrication, or wrongful use.

### Our principles

- Correctly conveying the company's stance is a fundamental requirement of highly transparent corporate management.
- To disclose financial information accurately, Nikon has a responsibility to prepare financial statements without misrepresentations caused by inaccurate accounting that is the result of fraud or error.
- Nikon will appropriately manage and disclose non-financial information such as that concerning the environment, human rights and labor relations to fulfill international non-financial information disclosure requirements and to meet our stakeholders' expectations.

### **What this means for us**

We will:

- Not move ahead or postpone accounting of profits, expenses, or depreciation of assets in order to meet our budget.
- Not engage in actions that could result in fraudulent accounting, such as postponing simple administrative procedures or making mistakes with estimated calculations.
- Account for profits, expenses and asset purchases incurred for business purposes, and for assets and liabilities in an appropriate manner for the disclosure of fact-based financial information.

#### **Group policies related to this chapter:**

Finance and Accounting Policies and Procedures  
Global Tax Policy

## 7. Provision of Valuable Products and Services

- Nikon aims to contribute to solving environmental and social issues by providing products, services, and solutions unique to Nikon. We will be attentive to and continuously aware of the expectations and demands of society and customers, and will strive to provide useful products, services, and solutions to society.
- We will comply with applicable laws, regulations, standards, and quality rules for the quality and safety of Nikon products, services, and solutions.
- We will also strive to provide user-friendly instructions and other information so that our products, services, and solutions may be used properly and safely.
- We will strive to respond to inquiries and requests fairly and promptly and to provide accurate information in an understandable way to customers to assist them in making sound decisions and judgments.
- Should quality or safety issues arise, Nikon will promptly implement appropriate measures such as recalling products, disclosing relevant information, and making efforts to prevent recurrence.

## Our principles

With a history spanning more than 100 years, we have continued to create new value that contributes to the development of a sustainable society. Through creative and effective *monodzukuri* (manufacturing), Nikon will strive to satisfy the expectations of customers and society by supplying unique, high-quality products to markets in a timely manner while elevating its brand value. In addition, safety and environmentally friendly products, services, and solutions are considered integral aspects of quality, and Nikon will comply with all applicable laws and regulations for ensuring the aforementioned quality aspects. To faithfully maintain quality, we will promote the standardization of related business activities, and equip employees with the necessary knowledge through training and education. We will also acknowledge and take measures to address the root causes of any quality issues.

## What this means for us

We will:

- With a global focus, strive to create new technologies, products, services, and solutions that will contribute to solving environmental and social issues.
- Strive to maintain and improve the quality of products, services, and solutions and follow rules created to ensure that the tasks required with each stage, from product planning to marketing to after-sales service, are properly completed.
- If we notice any accidents, quality or safety problems, or abnormalities with regard to our products, services, and solutions, we will promptly generate a report and take measures to address any such issues. We will also take measures to prevent similar occurrences in the future.

### **Group policies related to this chapter:**

Basic Quality Policy  
Quality Management Directive (QMD)  
Nikon Basic Green Procurement Policy

## 8. Community Relations

- We value individual and group diversity and will strive to understand and respect the cultures, values and customs of each community in which Nikon is doing business.
- Nikon will actively promote participation in activities which contribute to local communities and which serve public interests. Nikon will comply with all applicable laws relating to charitable donations in the countries and regions in which Nikon operates.
- Nikon will cooperate in maintaining social order, and we will not engage in illegal or unethical activities.

### Our principles

To facilitate business activities, it is essential that Nikon respects individual and group diversity and strives to earn the trust of local communities by understanding and respecting their culture, values and customs. It is also vital that we grow together with communities so that we may continue to carry out business activities. Nikon aims to address social issues and to build a foundation for growing together with local communities by actively promoting community contribution activities (corporate citizenship activities) and gaining a deep understanding of local customs, as well as other aspects pertaining to local communities. In addition, Nikon views efforts to contribute to and positively impact society as a foundation for doing business and will not tolerate any illegal or unethical activities.

### **What this means for us**

We will:

- Actively participate in activities that contribute to local communities (corporate citizenship activities) so that we may continue to grow with these communities.
- Comply with applicable national and regional laws and regulations regarding charitable donations and fulfill our accountability to stakeholders with transparency and fairness.
- Never be involved with people or organizations that engage in illegal or unethical behavior, such as bribery, threats, extortion, violence or discrimination, and will cooperate to maintain community order.

#### **Group policies related to this chapter:**

Nikon Corporate Citizenship Policy  
Donation Standards

## 9. Conflict of Interest

- We will avoid any practice that may constitute a conflict of interest, or the appearance of a conflict of interest.
- We will not engage in any activities that damage Nikon's interests in order to personally benefit ourselves or any third party.

### Our principles

A conflict of interest may arise when a member of the Personnel's individual interest conflicts, or may conflict, with the interests of the company. In the event of a conflict of interest, the interests of the company must take precedence. Individuals and third parties must not take advantage of their positions at the company for their personal gains.

### What this means for us

We will:

- Take no action that undermines the interests of the company, and will ensure that the personal interests of oneself, one's family, and one's friends and acquaintances will not affect one's business decisions.
- Promptly report the matters to one's supervisor and refrain from subsequent decision-making in the event that a situation involving a conflict of interest occurs or is perceived to have occurred.
- Not act in conflict with the interests of the company without advance permission, which includes holding concurrent positions serving as an officer or employee at a competitor company or business partner.

## Reporting/Consulting System, Consequences of Violation

We are responsible for reporting any violation or potential violation of the Code of Conduct.

- Reporting/Consulting System

Personnel who become aware of a violation or a potential violation of the Code of Conduct should report it promptly to or consult with their immediate supervisor and/or to the reporting/consulting office (or the reporting/consulting process applicable at each Nikon company) or designated section/person of the Nikon company by which they are employed. If there are any questions, Personnel should consult with their supervisor and/or to the reporting/consulting office or designated compliance section/person of the Nikon company by which they are employed.

- Non-retaliation

Personnel who report a violation or a potential violation of the Code of Conduct will not receive disadvantageous treatment or retaliation because of such reporting.

- Should a violation or potential violation of the Code of Conduct be reported to Nikon, the appropriate Personnel within Nikon will promptly investigate the facts, provide a resolution, and take appropriate measures to prevent a recurrence.

- Consequences of Violation

Violation of the Code of Conduct may result in disciplinary action by Nikon up to and including termination of employment, and in case of a violation of law, civil and/or criminal liability.

### **Our principles**

The Reporting/Consulting System is an important mechanism for Nikon itself in resolving and rectifying problems, and in minimizing the effects of these problems. It is also a mechanism for maintaining a sound workplace environment for employees to carry out their duties without undue worries. Leaving problems unaddressed could result in a serious situation that leads to significant damages, penalties, violation of laws or loss of trust in Nikon.

### **What this means for us**

We will:

- Immediately report to, or consult with, a superior when a concern arises in the workplace.
- Not keep issues to ourselves, but will use Nikon's Reporting/Consulting System when issues that may be difficult to bring up with a superior due to their nature arise.
- Never use the Reporting/Consulting System for improper purposes such as personal gain, libel or slander.

## Code of Conduct Administration

- Established, Revision and Discontinuance

Establishment, revision and discontinuance of the Code of Conduct can occur at any time by Nikon Corporation, and will take place first with a proposition from the Chairperson of the Compliance Committee of Nikon Corporation and then with an application to the Executive Committee of Nikon Corporation who will make a final decision. Minor changes will be decided by the Chairperson of the Compliance Committee of Nikon Corporation.

- Where the Code of Conduct differs from local laws, Nikon must always follow the higher standard. If in doubt, Personnel should talk to their supervisor and consult with the designated compliance section/person of the Nikon company by which they are employed about the appropriate conduct to adopt.