

# Society/Labor

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Critical procurement partners



In compliance with CSR Procurement Standards

Approx. **200**

Percentage of female managers at Nikon:



Target: 7.5%

Results: **6.9%**

Severity rate of lost time accidents at the Nikon Group:



**0.01%**

## Materiality 6

# Building a Resilient Supply Chain



## Reason for Prioritization

In recent years, stakeholders have become increasingly concerned about social issues related to human rights, work environments, health and safety, and the environment in the supply chain. In addition, raw material price fluctuations due to various factors such as global extreme weather events and natural disasters, geopolitical influences, and international conflicts have increased the instability and risks in the supply chain.

Against this backdrop, the Nikon Group, together with procurement partners who share our vision and act in unison, believes that it is necessary to listen to the views of society and build a resilient supply chain that can address these social issues.

## Commitment

With the rapidly changing supply chain environment, there is an urgent need to respond to unstable elements and risks, and the Nikon Group is taking action as a unified group here. Amid an environment like this, the "D" of QCD (Quality, Cost, Delivery) becomes even more important.

As uncertainty and volatility continue to prevail in parts procurement and logistics, the Nikon Group, both on its own and with procurement partners and act in unison, works to listen to the views of society and build a resilient supply chain that can address these social issues.

Sustainable procurement policies and activities are ingrained throughout the supply chain, and we build strong relationships with procurement partners to better visualize the supply chain. We will work with our procurement partners to formulate and enhance business continuity plans (BCP), monitor CO<sub>2</sub> emissions, and strengthen human rights due diligence, aiming to be able to respond flexibly to significantly changing business risks and social issues, and to achieve risk reduction and sustainable growth.

Nobuyuki Ishizuka  
Executive Vice President  
General Manager of Production Technology Division

## 【Activity Policies】

- Nikon Basic Procurement Policy
- Nikon CSR Procurement Standards
- Responsible Minerals Sourcing Policy
- Nikon Basic Green Procurement Policy
- Nikon Green Procurement Standards

## 【Organizations】

- Supply Chain Subcommittee

● Fiscal Year 2022 Materiality Goals and Results

Self-evaluation ○: Achieved △: Measures started but not yet achieved

Goals for Fiscal Year 2030	What Nikon Needs to Do	Related SDGs	Scope	Goals for Fiscal Year 2022	Results for Fiscal Year 2022	Self-Evaluation
Realization of effective procurement in which the supply chain as a whole contributes to the resolution of societal issues and safeguards quality, cost, and prompt delivery (QCD), by sharing Nikon's approach to procurement policy with suppliers and by implementing rigorous risk management	Further strengthen suppliers' CSR management systems	8,12	Procurement partners / tier 2 suppliers	CSR assessment of key partners (tier 2 suppliers and beyond) that should be prioritized in CSR procurement risk management	Conducted assessment for 10 key partners (suppliers with significant impact on business) using a questionnaire	○
			Procurement partners	Conduct CSR audits of three procurement partners	Conducted CSR audits and requested improvements from two procurement partners (one was scheduled to be conducted in June 2023 due to schedule adjustments)	△
			Procurement partners	Expand the survey on tantalum, tin, tungsten, gold, and cobalt contained in products including batteries and other imaging products in order to procure minerals in compliance with various regulations and laws in each country	Expanded the scope of the survey to include batteries and other imaging products. Identified risks from survey results and conducted due diligence	○
	Strengthen BCM by thoroughly implementing the collection and management of procurement data		Procurement partners	Understand the BCP structure of procurement partners	Conducted BCP structure surveys for 71 procurement partners to understand establishment status	○

# Supply Chain Management

## Basic Approach

Nikon considers its suppliers important partners helping us create and provide products and solutions useful for the world. Based on this belief, we strive to deepen mutual understanding and build trust with these procurement partners, and seek co-existence and co-prosperity with them. Furthermore, as a company working to build a better society and global environment as well as realize sustainable growth, we have established the Nikon Basic Procurement Policy to continually supply the world with useful products and solutions. Under this plan, we carry out our procurement activities in an honest and fair manner.

### Nikon Basic Procurement Policy (Summary)

Procurement based on the concept of partnership

1. Sustainable corporate activities
2. Open-door procurement
3. Procurement founded in fair competition



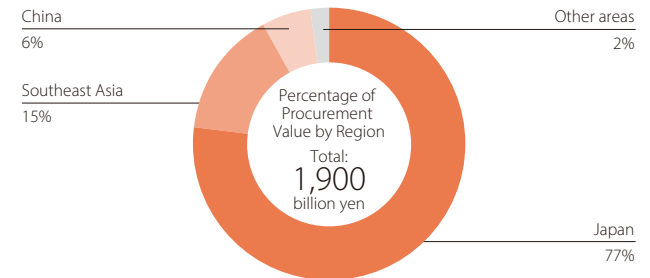
Nikon Basic Procurement Policy

<https://www.nikon.com/company/corporate/procurement/policy/>

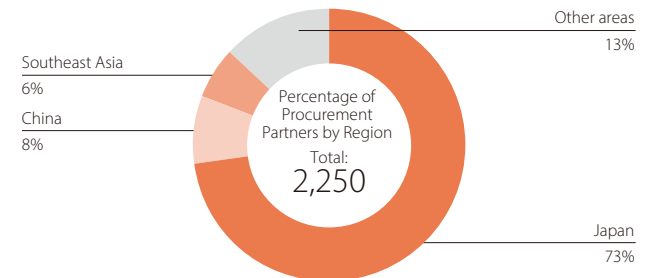
## The Nikon Group's Supply Chain

The Nikon Group has approximately 2,250 direct procurement partners globally. Beyond them, there are numerous tier 2 and tier 3 suppliers from whom we procure raw materials, electronic components, mechanical components, units, and others. In the fiscal year 2022, the percentages by region based on procurement value were 77% for Japan, 15% for Southeast Asia, 6% for China, and 2% for other regions. Percentages of procurement partners by region were 73% in Japan, 8% in China, 6% in Southeast Asia, and 13% in other regions. To ensure a high degree of quality, cost and delivery (QCD), over seas production bases of Nikon group ,where are manufacturing Nikon products, hire employees locally and actively procure raw materials and parts from their countries and regions. We require our local procurement partners to comply with various standards and provide assistance for improvement. We work from a long-term perspective so as to enhance our procurement partners' corporate capabilities and to generate new business opportunities for them.

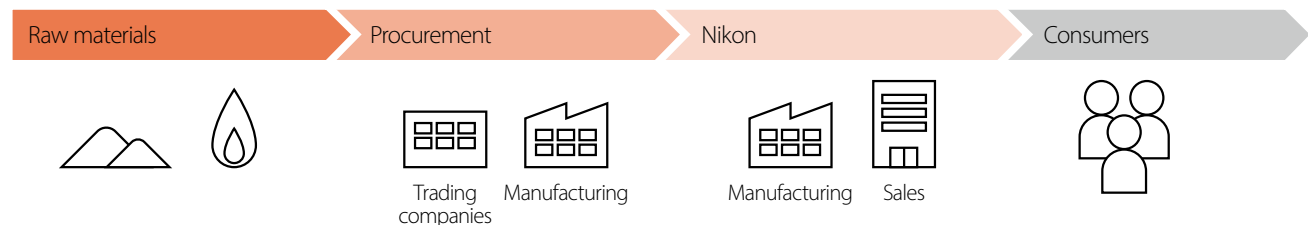
### Percentage of Procurement Value by Region



### Percentage of Procurement Partners by Region



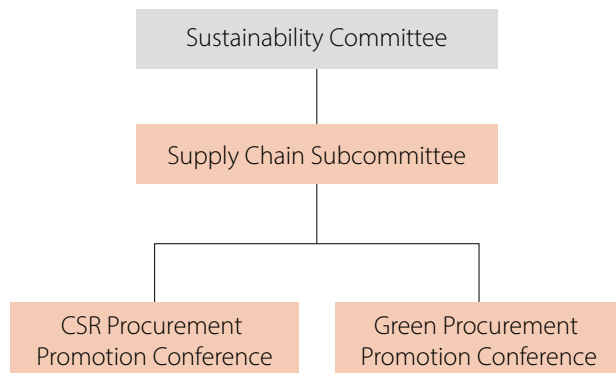
### Supply Chain Illustration



## System

Each fiscal year, we set targets to be addressed for important issues in the area of establishing the supply chain. These targets, and progress toward their achievement, are reported at the Sustainability Committee. We have also established a Supply Chain Subcommittee under the supervision of the Procurement Sector Manager, with the heads of quality assurance and procurement from each business and the presidents of Group manufacturing companies in and outside Japan as core members. This subcommittee reports on activities and deliberates on plans for a responsible supply chain. Under this subcommittee, we have established the CSR Procurement Promotion Conference and the Green Procurement Promotion Conference to promote specific activities for a responsible supply chain in cooperation with procurement departments and relevant departments in our businesses, as well as the management departments at each manufacturing facility.

### ● Outline of Supply Chain Management System



## Identifying Critical Procurement Partners

The Nikon Group identifies critical procurement partners through the following process based on perspectives such as procurement value, importance of procured components, and availability of substitutes. Once these are identified, we prioritize various surveys on social issues, while also working to strengthen inter-company collaboration in the course of our business. As of the fiscal year 2022, the Nikon Group has identified approximately 200 companies globally as critical procurement partners.

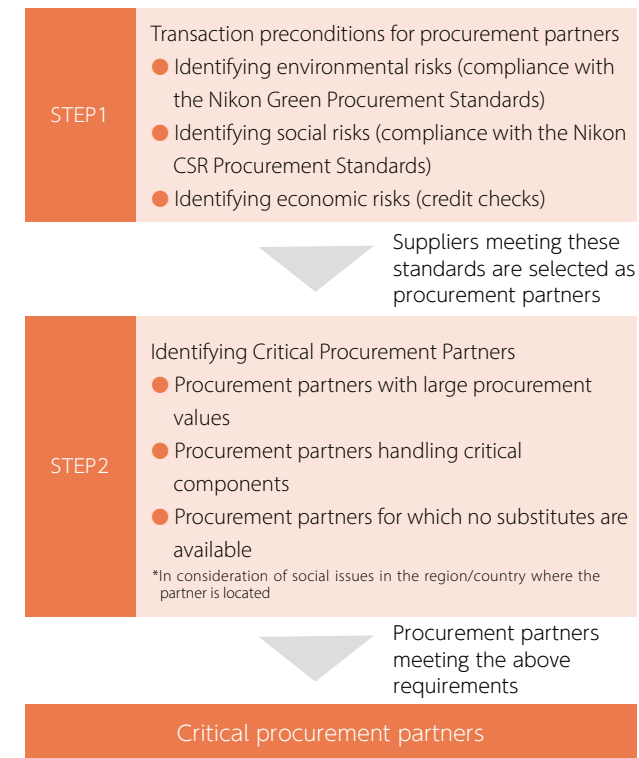
### STEP1

When we start business with new supplier, we select suppliers in accordance with the Nikon Group's Procurement Procedure Manual. We also stipulate ESG in the terms of our master agreements. Suppliers that meet these standards are selected as procurement partners.

### STEP2

Among procurement partners, those with whom we have large procurement values, those that handle critical components, and those for which no substitutes are available are identified as critical procurement partners.

### ● Process for Identifying Critical Procurement Partners



### ● Number of Procurement Partners (Tier 1 Suppliers) and Critical Procurement Partners

	FY2018	FY2019	FY2020	FY2021	FY2022
Procurement partners (tier 1 suppliers, approximate)	3,200	2,700	2,700	2,300	2,250
Critical procurement partners (approximate)	600	200	200	200	200

(companies)

\*From the fiscal year 2019, this has been changed to the top 80% of procurement value for the Nikon Group

## Communication with Procurement Partners

### Procurement Partner Briefings

The Nikon Group holds briefings every year to inform procurement partners of the Nikon Group's procurement and ESG-related policies and approaches. From fiscal year 2021 onward, meetings have been held online to facilitate interactive communication with procurement partners in Japan, China, and Thailand.

The Nikon Group will continue to deepen dialogue and collaboration with its procurement partners and fulfill its social responsibilities throughout the supply chain as a company that is trusted by society.



Procurement Partner Briefing Report 2022

[https://www.nikon.com/company/sustainability/society-labor/supply-chain/Procurement\\_Partner\\_Briefing\\_2022.pdf](https://www.nikon.com/company/sustainability/society-labor/supply-chain/Procurement_Partner_Briefing_2022.pdf)

### Education and Communication

In order to promote activities toward a responsible supply chain, each and every employee in procurement departments must acquire the necessary knowledge, understand the basic procurement policy and various standards, and put these into action. To this end, we offer a variety of training programs and awareness-raising activities.

In the fiscal year 2022, as in the previous year, we continued to deepen understanding of ESG procurement, strategic procurement, and stable procurement through training for internal hands-on procurement staffers and for new employees.

### Meetings with Procurement Partners

The Nikon Group believes in close communication with its procurement partners and the importance of strengthening mutual relationships. To this end, we invite representatives of major procurement partners in Japan and overseas to our annual meetings with procurement partners. At these meetings, we report on Nikon's business environment, provide an overview of our business operations, and convey a message from the president.

### Procurement Hotline

The Nikon Group has set up an externally accessible point of contact so that any information on violations of our CSR procurement standards in the supply chain can be quickly conveyed and acted upon. In the fiscal year 2022, there were 0 calls to the procurement hotline.



Inquiries (Procurement, CSR Procurement, Green Procurement)

<https://www.nikon.com/company/corporate/procurement/policy/>

Inquiries (Responsible Minerals Sourcing Hotline)

<https://www.nikon.com/company/sustainability/society-labor/supply-chain/form/>

## Initiatives for Procurement Partners

### Visualizing the Supply Chain

The Nikon Group has been engaged in initiatives to accurately understand the current situation of its supply chain. These initiatives have enabled us to quickly and precisely identify the compliance status of our procurement partners with the standards required by the Nikon Group.

In the fiscal year 2023, with the aim of building a resilient supply chain, we will work toward better visualization of tier 2 procurement partners and beyond which handle critical components.

#### ● Past Initiatives

FY2019	<ul style="list-style-type: none"> <li>Introduced an integrated procurement data management system to visualize supplier information for the entire Nikon Group</li> <li>Started registering and gathering information on direct material procurement partners in Japan and Asian Group locations, where major suppliers are concentrated</li> </ul>
FY2020	<ul style="list-style-type: none"> <li>Added information used for procurement partner assessment (e.g., management status, business transactions, ESG information)</li> <li>Expanded scope of visualization to include indirect material procurement partners and procurement partners of Group locations in Europe</li> </ul>
FY2021	<ul style="list-style-type: none"> <li>Added business continuity plan (BCP) and quality information used for procurement partner assessment</li> </ul>
FY2022	<ul style="list-style-type: none"> <li>Conducted regular assessments of procurement partners based on visualized information</li> <li>Provided assistance for improvement to procurement partners that do not meet standards and promoted transaction suspension of transaction volume review based on survey results and improvement status</li> </ul>

### Strengthening BCP

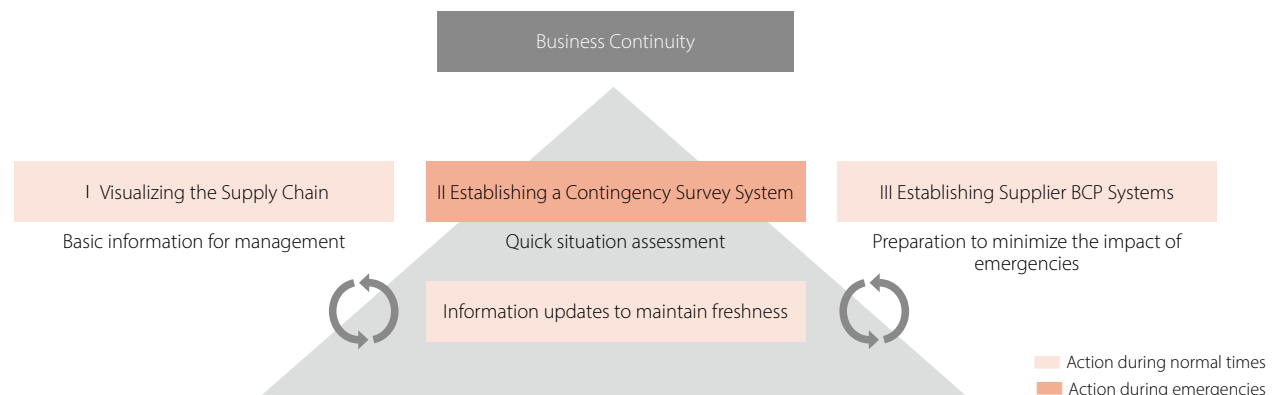
In recent years, strengthening the ability to respond to natural disasters such as earthquakes and floods, as well as the spread of new viruses, has become an important issue in supply chain management. The Nikon Group has established a BCP management system for rapid response in the event of an emergency and has engaged in the following initiatives.

In the fiscal year 2023, we will work toward greater visualization of the supply chain through activities such

as enhancing information on the locations of our major procurement partners for direct materials and auxiliary manufacturing material, including those in tier 2 and beyond. In addition, we will entrench operation of our contingency survey so as to rapidly assess the situation in the event of an emergency. Furthermore, based on the survey results, we will provide support to major procurement partners with inadequate BCP systems to help them build systems for handling emergencies and promote the strengthening of BCPs in the supply chains.

#### ● Past Initiatives

	I Visualizing the Supply Chain	II Establishing a Contingency Survey System	III Establishing Supplier BCP Systems
FY2020	<ul style="list-style-type: none"> <li>Registered procurement partner (tier 1 supplier) location information necessary for contingency surveys in the integrated procurement data management system</li> </ul>	<ul style="list-style-type: none"> <li>Developed BCP internal first response infrastructure to efficiently assess procurement partner situations in the event of an emergency</li> </ul>	
FY2021		<ul style="list-style-type: none"> <li>Launched contingency surveys using the integrated procurement data management system</li> </ul>	<ul style="list-style-type: none"> <li>Conducted a survey on the status of infrastructure-related BCP system construction among our major procurement partners</li> </ul>
FY2022	<ul style="list-style-type: none"> <li>Expanded the scope of supplier location information visualization to include tier 2 suppliers and beyond (manufacturing sites beyond trading company procurement partners)</li> </ul>		<ul style="list-style-type: none"> <li>Conducted a survey on the status of infrastructure-related BCP system construction among our major procurement partners, including those not related to infrastructure</li> </ul>



# Promoting CSR Procurement

## Basic Approach

Nikon, as a global company, is committed to actively addressing social issues such as human rights, work environments, health and safety, and the environment in its supply chain, including among its procurement partners, through CSR procurement activities, in order to meet society's expectations with trust and to realize a sustainable society. With this in mind, the Nikon Group has established the Nikon CSR Procurement Standards in accordance with the Responsible Business Alliance (RBA) Code of Conduct. We have published these standards in Japanese, English, and Chinese. The Nikon Group incorporates compliance with the Nikon CSR Procurement Standards in its master agreements, and we ask all our procurement partners and their suppliers to act responsibly in accordance with these standards.

Initiatives for RBA (➔ p.015)



Nikon CSR Procurement Standards  
<https://www.jp.nikon.com/company/corporate/procurement/csr/>

## Initiatives for Procurement Partners

CSR procurement at the Nikon Group is an activity aimed at monitoring the implementation of CSR elements such as human rights, work environments, health and safety, and environment in the supply chain and at reducing risks. Assessments are conducted according to risk level. In cases where there is no direct business relationship with Nikon, we conduct assessments through our tier 1 supplier procurement partners, which include trading and manufacturing companies.

### Compliance Requests

The Nikon Group incorporates compliance with the Nikon CSR Procurement Standards in its master agreements, and we ask all our procurement partners and their suppliers to act responsibly in accordance with these standards.

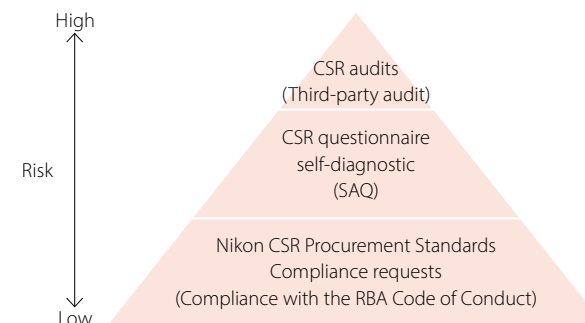
### Procurement Partner Assessments

Assessments of critical procurement partners are conducted once every three years. For those critical procurement partners for the Nikon Group's business, identified as those with large procurement values, those handling critical components, those without available substitutes, and in consideration of any social issues at the respective partners' location, we use CSR questionnaires to conduct a self-diagnostic to identify the level at which partners are implementing the Nikon CSR Procurement Standards. The CSR questionnaire is based on the RBA questionnaire and is conducted as an assessment of items related to human rights and human life, such as forced labor and child labor, with its own weighting. If the diagnostic results do not meet the target standards, improvements are requested.

Furthermore, we conduct CSR audits (third-party audits) of procurement partners that are particularly critical to our business or that we judge to be high-risk. Nikon will provide assistance for improvements to address issues identified through CSR questionnaire diagnostics and CSR audits. If a serious violation of the Nikon CSR Procurement Standards is confirmed, or if a procurement partner does not cooperate sufficiently in a survey or audit or make any improvements to address issues, we will review our business relationship with the partner. In addition, we always conduct CSR questionnaire diagnostics for new suppliers before entering into a business contract with them, after confirming that they meet our standards.

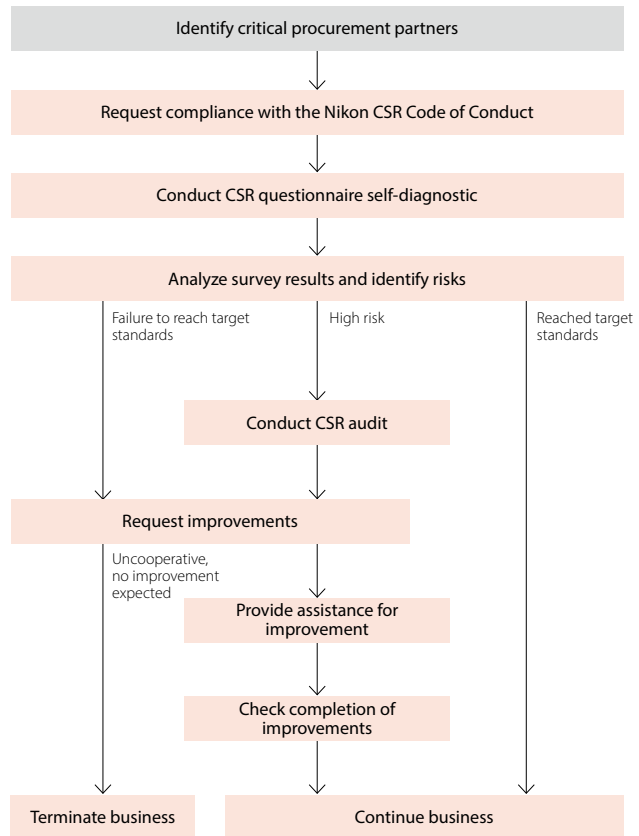
In the fiscal year 2022, our CSR questionnaire was overhauled to align with the RBA's Self-Assessment Questionnaire (SAQ) for the purpose of efficient and effective CSR surveys and risk analysis. We have also revised the standards for determining high risk (less than 60% for each item) so that the status of CSR-related initiatives and risks can be strictly monitored. We have launched use of our revised questionnaire beginning with our survey for key partners (suppliers with a significant impact on our business).

### ● Risk-Based Procurement Partner Assessments

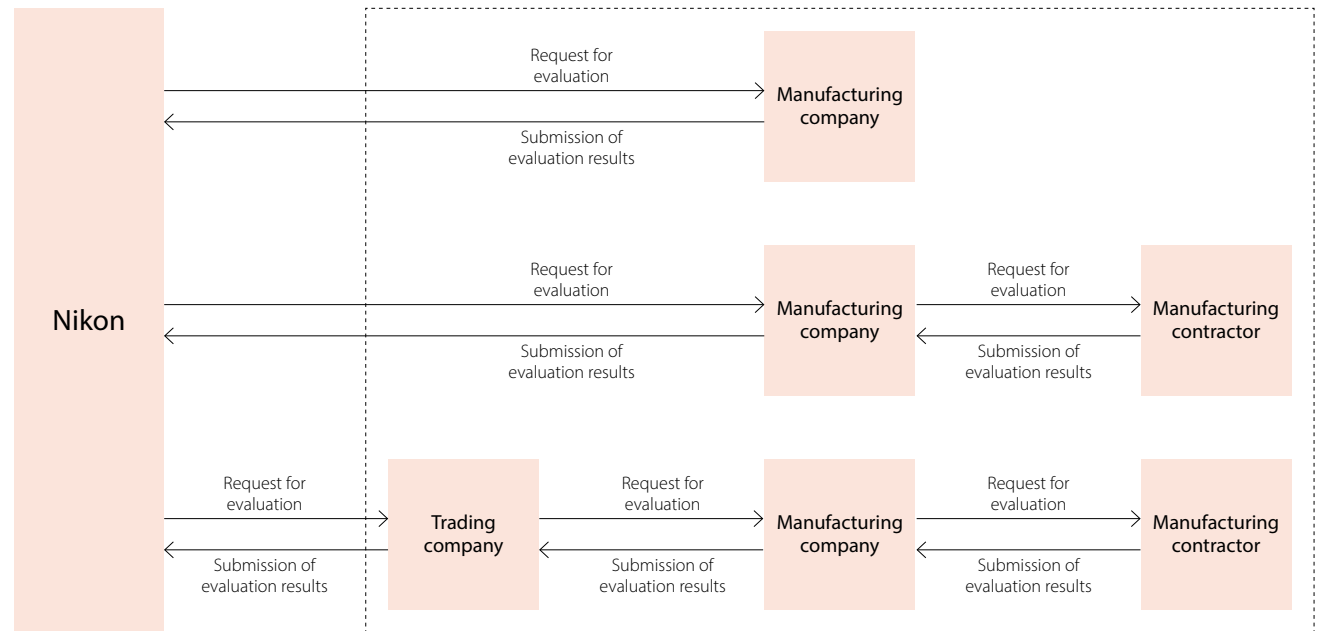




● Flowchart of Critical Procurement Partner Assessments



● Scope of Assessments



## Results of Fiscal Year 2022 Assessment

We requested that new procurement partners and key partners (suppliers with a significant impact on our business) comply with the Nikon CSR Procurement Standards and conducted CSR questionnaire diagnostics. We also conducted CSR audits of our procurement partners.

### New Procurement Partners

In the fiscal year 2022, we conducted CSR assessment diagnostics for 7 procurement partners with whom we began new business transactions. Each was confirmed to be in compliance with our target standards, and we began doing business with them as procurement partners.

### Procurement Partners (Tier 1 Suppliers)

In the fiscal year 2022, we conducted CSR audits (third-party audits) for 2 procurement partners (outside Japan). Based on the Nikon CSR Procurement Standards, we requested improvement of items that are not in compliance with respect to labor, health and safety, the environment, and ethics. In the fiscal year 2023, we plan to conduct assessments of our procurement partners (tier 1 suppliers) once every three years.

### Key Partners (Tier 2 Suppliers and Beyond)

In the fiscal year 2022, we conducted CSR questionnaire diagnostics for 10 key partners (7 in Japan and 3 overseas) and confirmed that they reached the target standards.

## Major Improvement Request Cases for CSR Audit Findings

### ● Notification of terms and conditions of employment on signing employment contracts

Issue	Failure to provide notification of contract terms on starting fixed-term employment
Assistance for improvement	Improvement requested

### ● Assessing the suitability of applicants during the hiring process

Issue	Unnecessary pre-employment examination requests
Assistance for improvement	Improvement requested

### ● Policies and procedures for eliminating discrimination

Issue	Failure to formulate policies and procedures
Assistance for improvement	Improvement requested

### ● Assessment results

	FY2018	FY2019	FY2020	FY2021	FY2022	Notes
CSR questionnaire diagnosis	208	—	211	—	—	Critical procurement partners (tier 1 suppliers)
	—	8	—	15	7	New procurement partners (tier 1 suppliers)
	—	—	60	43	10	Suppliers other than tier 1 suppliers (tier 2 and beyond, including key partners)
Improvement requests based on CSR assessment results	10	10	10	13	—	
Improvement requests based on CSR audits	4	3	3	—	2	Critical procurement partners (tier 1 suppliers)
Improvements completed	13	14	13	26	—	Some improvements were completed in the fiscal year following the improvement request

### ● Fees related to employment

Issue	Failure to pay fees for issuing medical certificates at the time of new employment
Assistance for improvement	Improvement requested

### ● Assessing the suitability of applicants during the hiring process

Issue	Failure to provide notification of special retirement benefits paid on expiration of contract on signing employment contracts
Assistance for improvement	Improvement requested

### ● Working hours

Issue	Long working hours
Assistance for improvement	Improvement requested

## Support for Responsible Minerals Sourcing

Besides establishing its Responsible Minerals Sourcing Policy, the Nikon Group is collaborating with its procurement partners on surveys on responsible minerals sourcing and on due diligence.

In the fiscal year 2022, as in previous years, we conducted surveys for 3TG for all of our business units' products. In addition, the scope of cobalt surveys was expanded to include a cumulative total of four business units. More detailed information about these measures is published in our Responsible Minerals Sourcing Report 2023 (Results of the 2022 Survey) on the Nikon website.

\* 3TG refers to tin, tantalum, tungsten, and gold, which are designated as conflict minerals.



Web

Responsible Minerals Sourcing Report 2023 (Results of the 2022 Survey)

[https://www.nikon.com/company/sustainability/society-labor/supply-chain/Responsible\\_Minerals\\_Sourcing\\_Report\\_2022\\_Survey.pdf](https://www.nikon.com/company/sustainability/society-labor/supply-chain/Responsible_Minerals_Sourcing_Report_2022_Survey.pdf)

List of 3TG Smelters and Cobalt Refiners (Conformant and Active as of February 28, 2023) Identified by the 2022 Survey

[https://www.nikon.com/company/sustainability/society-labor/supply-chain/rmap\\_list.pdf](https://www.nikon.com/company/sustainability/society-labor/supply-chain/rmap_list.pdf)

# Promoting Green Procurement

## Basic Approach

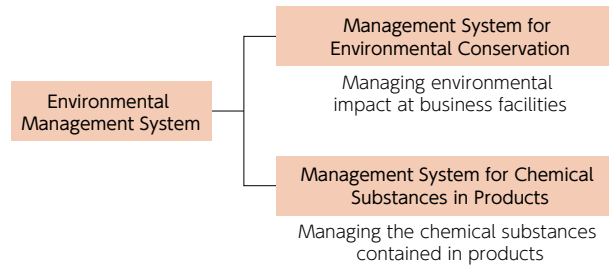
Environmental regulations like the EU RoHS<sup>\*1</sup> Directive and REACH<sup>\*2</sup> Regulations have even become more widespread in countries outside the EU, and Japan has also established similar laws and regulations. Moreover, efforts aimed at reducing CO<sub>2</sub> are rapidly growing around the world. The Nikon Group has been aware of the social issues behind these social trends for some time. Based on the Nikon Basic Green Procurement Policy, we prioritize procurement of goods that give consideration to environmental impact, and we have made active involvement in environmental conservation a condition of doing business with our procurement partners. More specifically, we require that procurement partners abide by the Nikon Green Procurement Standards. Procurement partners are asked to establish and properly utilize an environmental management system (comprising both a management system for environmental conservation and a management system for chemical substances in products). Furthermore, we have defined prohibited chemical substances and controlled chemical substances for the chemical substances contained in products and used in manufacturing processes in the Separate Volume: Corresponding Chemical Substance List, a part of the aforementioned standards, and we require our procurement partners to comply with this and to submit data via chemSHERPA or another appropriate method. The Nikon Green Procurement Standards and the Corresponding Chemical Substance List include not only the substances regulated by the EU RoHS Directive, REACH Regulations, and other laws and regulations in Japan and abroad, but also our own regulated substances, and are both revised and updated regularly.

\* 1 EU RoHS Directive → p.084  
 \* 2 REACH Regulations → p.084  
 \* 3 chemSHERPA → p.084



Nikon Basic Green Procurement Policy/Nikon Green Procurement Standards  
<https://www.nikon.com/company/corporate/procurement/green/>

### ● Environmental Management System



## Environmental Management System Survey and Assessment

At the Nikon Group, we conduct environmental management system surveys every three years in accordance with risks of chemical substances occurring in materials used, components, and processes. In addition, we conduct environmental management system assessments to check the status of the establishment and management of environmental management systems. Environmental management system assessments are conducted for procurement partners identified as high risk for containing prohibited chemical substances in products, and includes a review of their environmental management systems (EMS) and chemical management systems (CMS), including the extent to which procurement partners have put in place third party-certified management systems. For any non-compliance in environmental management systems found in the assessment process, improvements are requested, and assessments are completed after confirming that improvements have been made. We use the results of these assessments to certify procurement partners deemed compliant with our system standards as Nikon Environmental Partners. After certification, we continue to carry out checks on their system maintenance. For small companies where it is challenging to establish a system, we conduct a simplified environmental management system assessment to confirm the communication and management of chemical substance information. The scope of this simple assessment has been expanded to include trading companies. Please note that the simple assessment confirms that there are no problems in the management of chemical substances contained in products is not a partner certification. In addition, we request that procurement partners submit data via chemSHERPA to check that their management of chemical substances contained in products is functioning effectively.

## Education and Communication

### Cultivation of Environmental Management System Assessors

To maintain and enhance the quality of its procurement partner assessments, the Nikon Group works to cultivate Environmental Management System Assessors.

More specifically, we provide education and training for personnel selected by Nikon business units and Group companies in and outside Japan, certifying those who meet our requirements as Environmental Management System Assessors. These certified assessors are the driving force in conducting environmental system assessments.

In the fiscal year 2022, 18 new assessors were certified, bringing the total number of assessors within the Nikon Group to 202\*. That same year, we also provided education and practical training on management of chemical substances contained in products for assessors, guided by external instructors.

\* As of February 27, 2023

## Results of Fiscal Year 2022 Assessment

We requested that procurement partners comply with the Nikon Green Procurement Standards and conducted assessments.

### Procurement Partners (Tier 1 Suppliers)

In the fiscal year 2022, we conducted assessments for 59 procurement partners. As a result, 31 companies\* were newly certified as Environmental Partners.

In addition, renewal assessments were conducted for 153 procurement partners, bringing the total number of certified companies to 456\*, including newly-certified companies. For the two companies\* that were not certified, we requested improvements.

\* As of April 11, 2023

### Action and Improvement Assistance Case for Findings from External Organizations

In the fiscal year 2021, a German consumer agency indicated that the straps attached to some Nikon binoculars exceeded the standard values for PAHs\*, a substance banned under REACH. Nikon suspended shipments of the products in question and, after determining that the straps had no impact on the human body, replaced products for customers who made replacement requests. We have revoked the Nikon Environmental Partner certification for the strap manufacturer and have made requests for improvements.

\* PAHs: Polycyclic aromatic hydrocarbons. Since December 27, 2015, tight restrictions have been imposed on standard content levels of eight PAHs for some uses.

### ● Environmental Partner Certification Results

	FY2019	FY2020	FY2021	FY2022
Assessments	126	139	149	180
Newly-certified Environmental Partners	21	18	36	31
Total certified Environmental Partners	—	420	453	456

\* Figures reflect decrease due to termination of business, business closures, etc. Figures reflecting this decrease began in the fiscal year 2020.