

## Materiality 7

# Respecting Human Rights



Respecting human rights in every aspect of our business activities is fundamental to our corporate social responsibility. The importance of respecting the human rights of all stakeholders is increasing, including the human rights of stakeholders in the business value chain and employees.

The Nikon Group recognizes the importance of human rights and the issues involved, and we pursue initiatives to respect human rights in accordance with the Nikon Human Rights Policy. We also foster a corporate culture that respects human rights so that all employees of the Nikon Group will conduct their business activities with integrity and respect human rights in accordance with this policy and relevant laws and regulations.

## Activity Policies

- Nikon Human Rights Policy

## Organizations

- Human Rights Subcommittee

### Indicators and Targets

Self-Evaluation ○ : Achieved △ : Measures partially achieved or revised

Indicators	Targets (Year of Achievement)	Fiscal Year 2024 Plan (Action Plan)	Fiscal Year 2024 Results	Self-Evaluation	Fiscal Year 2025 Plan (Action Plan)
Level of awareness of Nikon Human Rights Policy	100% (FY2030)	<ul style="list-style-type: none"> <li>Degree of human rights education: 80% or more</li> </ul>	<ul style="list-style-type: none"> <li>Implemented human rights e-learning for all Nikon Group employees in Japan Participation rate: 83% (99% of respondents indicated an understanding of the human rights policy in the post-training survey)</li> </ul>	○	<ul style="list-style-type: none"> <li>Share the revised Human Rights Policy with all employees</li> <li>Distribute e-mails, newsletters, etc., to employees and managers</li> <li>Conduct training via e-learning</li> </ul>
Conformity rate of RBA Code of Conduct (manufacturing facilities)	90% or more (FY2025)	<ul style="list-style-type: none"> <li>Implement improvement plans for Nikon plants and Nikon Group companies formulated in fiscal year 2023</li> </ul>	<ul style="list-style-type: none"> <li>Implemented RBA self-check issue improvement plans for all eligible business facilities</li> </ul>	○	<ul style="list-style-type: none"> <li>Implement RBA-based human rights risk surveys within Nikon (Nikon Head Office/plants and Group companies) and formulate improvement plans *</li> </ul>

\* Starting in fiscal year 2025, the indicators and target were changed to "Implementation rate of human rights due diligence at Nikon Group: 100%"

# Human Rights Initiatives

## Basic Approach

In our business activities, the Nikon Group is directly and indirectly involved in the human rights of a variety of stakeholders. It is for this reason that our stance, which emphasizes respect for the human rights of all these people, is clearly enunciated in "2. Respect for Human Rights" of the Nikon Code of Conduct.

Furthermore, we have established our Nikon Human Rights Policy in order to clearly show how we address human rights issues related to our business activities under our Code of Conduct. This policy is a comprehensive guideline for practicing initiatives within the Nikon Group aligned with the 2011 UN Guiding Principles on Business and Human Rights. We consulted with the main relevant departments internally and sought the advice of outside experts in formulating the policy, which was approved by the Board of Directors and enacted in 2019. We continue to pursue higher levels of respect for human rights in response to changes in social demands and business activities. In fiscal year 2024, we reviewed the policy after a human rights impact assessment, a close look of our past efforts, and other factors, revising our policy on human rights in April 2025.

The Nikon Group has other policies and standards in place specific to individual human rights issues, including the Nikon CSR Procurement Standards and the Responsible Minerals Sourcing Policy.

Joining the UN Global Compact → **p.017**



Nikon Code of Conduct

Nikon Human Rights Policy

Nikon CSR Procurement Standards

Responsible Minerals Sourcing Policy

## Strategy

### Risk

Human rights are our universal rights from birth to live happily and be treated with human dignity. As entities that respect human rights, companies must not inflict or encourage adverse impacts on human rights, and must take action should such impacts arise. Companies must also seek to prevent or mitigate adverse impacts on human rights arising from business relationships that are directly related to company activities, products, or services, even if the company is not at fault. Failure to address issues such as the protection and expansion of human rights in the value chain risks violating the rights of rights holders with whom the Nikon Group is involved. Such failures may cause damage to brand value, loss of customer and public trust, and declines in business performance.

### Opportunities

We can prevent adverse impacts on human rights by understanding and addressing human rights risks in the value chain. By respecting human rights and considering

health and safety, we strive to increase employee job satisfaction and productivity through decent work, and improve the recruitment and retention of outstanding human resources. We can build trust with procurement partners by prohibiting forced labor and child labor, engaging in responsible mineral sourcing, and respecting workers' rights.

These efforts will also allow us to pursue responsible and resilient procurement. Moreover, we can improve public trust and brand value by working to protect and extend human rights.

## Strategy

In accordance with the revised Nikon Human Rights Policy, amended in April 2025, we will establish a remedy mechanism, establish a governance system, and continue to improve human rights through stakeholder engagement. At the same time, we will ensure that we conduct human rights due diligence in line with the UN Guiding Principles on Business and Human Rights for the six human rights issues specified in this policy (health and safety, work environments, human rights issues in the supply chain, prohibition of child labor and forced labor, ethical use of AI, and access to remedy).

## Governance

The Sustainability Committee discusses Nikon Group initiatives and progress related to the Nikon Human Rights

Policy. The president of the company chairs this committee, while the Executive Committee receives reports and approves committee resolutions, overseen by the Board of Directors.

In fiscal year 2024, we established the Human Rights Initiative Working Group under the Sustainability Committee to review and strengthen our efforts related to human rights. In April 2025, we established the Human Rights Subcommittee, headed by the General Manager of the Group Governance & Administration Division, an officer of the Company. The subcommittee conducts necessary research, gathers information, and formulates response plans to conduct and manage human rights initiatives comprehensively throughout the Group. The Human Rights Subcommittee meets twice yearly to confirm the details of activities.

## Reporting and Notifications on Human Rights

Any Group employee can use these systems to report violations of the Nikon Code of Conduct (including issues related to human rights). For external stakeholders, we have several channels of inquiry, including contact points for suppliers and customer support, a hotline dedicated to conflict minerals issues, etc. In fiscal year 2025, we plan to offer a contact point available for any stakeholder to consult, staffed by independent third-party experts.

Reporting and Consulting System (Code of Conduct Hotline) ➡ **p.131**

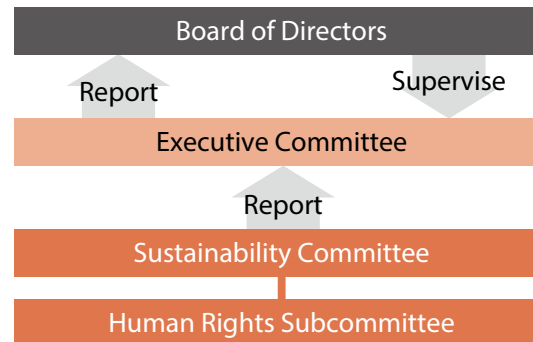


Inquiries

(Procurement, CSR Procurement, Green Procurement)

Responsible Minerals Sourcing Hotline

## Human Rights Governance Structure



## Salient Human Rights Issues Discussed by the Human Rights Committee and Responsible Departments

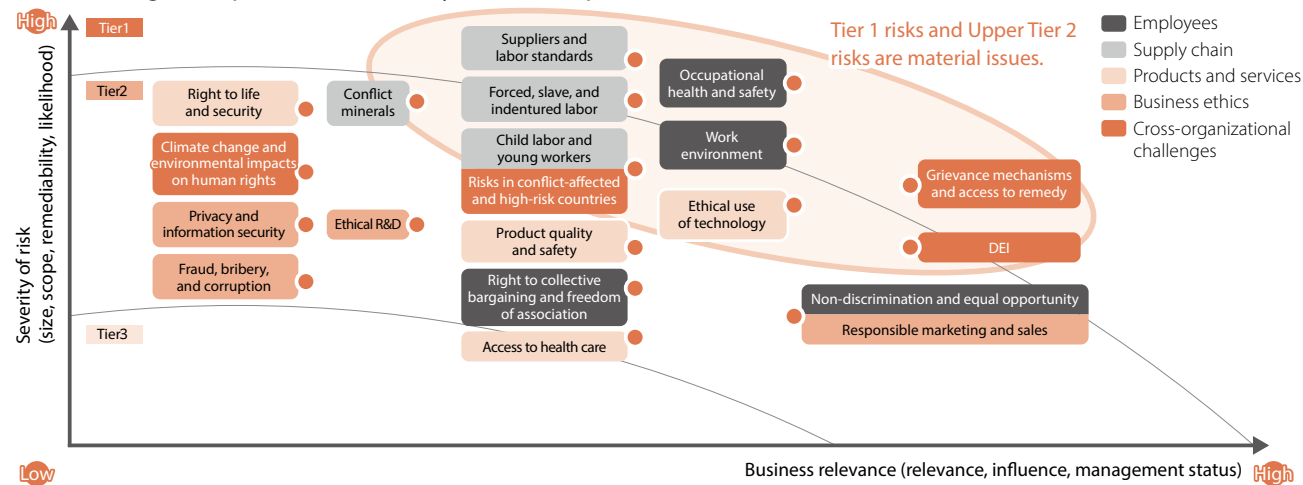
Material Human Rights Issues	Responsible Department
Safety and Health	Human Resources Department
Work Environment	Human Resources Dept., Corporate Sustainability Dept.
Human Rights Issues in the Supply Chain	Strategic Procurement Department
Prohibition of Child Labor and Forced Labor	Strategic Procurement Dept., Corporate Sustainability Dept.
Access to Remedy	Corporate Sustainability Dept., Human Resources Dept., Compliance Dept., Strategic Procurement Dept.
Ethical Use of AI	Advanced Technology Research & Development Div., IT Solutions Div., Quality Strategy and Management Dept.

## Risk Management

When formulating the Nikon Human Rights Policy in fiscal 2019, the Nikon Group used international human rights standards as a reference for this assessment, benchmarking Nikon's situation against industry peers and reviewing past human rights violations reported in business domains where Nikon is active.

We hired outside experts to conduct a human rights impact assessment during fiscal year 2024 to review our measures to respect human rights. The assessment identified, mapped, and prioritized issues that may affect rights holders in the Nikon value chain, identifying six salient human rights issues. We also took a look at past efforts to ensure the proper implementation based on the UN Guiding Principles. Our human rights policy reflects these six salient human rights issues, stating that we will conduct initiatives and make continuous improvements.

## Human Rights Impact Assessment by External Experts (Assessment Results)



surveys based on the RBA Code of Conduct at Group non-manufacturing companies in and outside Japan, as well as at certain companies with whom we contract.

Moreover, we collect information on the latest trends and collaborate with relevant internal parties, while taking appropriate actions in response to the tightening of laws and regulations on human rights in various countries and regions.

\*3 Validated Audit Process (VAP): An audit to verify compliance with the RBA's Code of Conduct for labor, health and safety, environment, and ethics, conducted by an audit organization accredited by the RBA.

Joining the RBA → p.017

Other related measures

Promoting CSR Procurement → p.096

Responsible Minerals Sourcing Report 2025 (Results of the 2024 Survey)

## Major Initiatives

### Monitoring

In the Nikon Group, we conduct human rights and labor monitoring surveys for Group companies each year in order to continuously improve how we address human rights. The results of these surveys are reported to the Sustainability Committee, and we endeavor to prevent the occurrence or recurrence of human rights violations.

Nikon has joined the Responsible Business Alliance (RBA) and uses the self-assessment tool for RBA Code of Conduct compliance to monitor human rights risks. We conducted an RBA Code of Conduct self-assessment in fiscal year 2022 at all Group manufacturing companies in Japan and overseas,

as well as each Nikon plant. We crafted an improvement plan in fiscal year 2023 and implemented plan measures during fiscal year 2024. We also revised employment rules at Nikon and Group companies in Japan to delete pay reduction from forms of disciplinary action to appropriately address the salary reduction regulations found to be non-compliant in the RBA VAP\*<sup>3</sup> reaudit conducted at the Kumagaya Plant in fiscal year 2023.

The Nikon Group also conducts an annual survey on human rights and labor issues at each Group company. In the past, we checked mainly for the presence of migrant workers and foreign technical trainees. In fiscal year 2024, however, we conducted a ground-up review of the survey sheet to ensure we identify risks related to the six material human rights issues. Beginning in fiscal year 2025, we will conduct

### Human Rights Training

The Nikon Group works to disseminate information and raise awareness about human rights among our executives and employees. We also provide presentations about the importance of human rights issues to our procurement partners as well as persons in charge of procurement within the Nikon Group.

## ● Major Human Rights Initiatives by the Nikon Group

FY1997	Established the Business Conduct Committee (currently the Compliance Committee)
FY2001	Established the Nikon Code of Conduct, which touches on respect for human rights Established the Code of Conduct Hotline
FY2004	Established the Nikon Charter of Corporate Behavior, clearly stating respect for human rights as the basic approach of the Nikon Group
FY2006	Established the CSR Committee (currently the Sustainability Committee) to integrate CSR-related activities, including respect for human rights, and create a company-wide promotion system
FY2007	Revised the Nikon Charter of Corporate Behavior and newly established the Nikon CSR Charter (revised content regarding respect for human rights) Established the Nikon Procurement Partner's CSR Guidelines, clearly stating our approach to CSR in procurement, including respect for human rights, and what we expect of our procurement partners Joined the United Nations Global Compact (UN Global Compact)
FY2010	Launched monitoring surveys to manage human rights and labor standards globally for Group companies
FY2011	Established the Policy on Conflict Minerals and established a hotline for conflict minerals
FY2012	Launched conflict minerals survey and disclosure of survey results
FY2014	Joined the Responsible Minerals Initiative (RMI) *1
FY2015	Abolished the Nikon Procurement Partner's CSR Guidelines, established the Nikon CSR Procurement Standards, and launched CSR assessments and CSR audits
FY2016	Launched disclosure of compliance statement with the UK Modern Slavery Act
FY2018	Integrated the Nikon CSR Charter and Nikon Code of Conduct integrated into a new Nikon Code of Conduct to serve as the Group's unified standard Joined the Responsible Business Alliance (RBA) *2
FY2019	Established the Nikon Human Rights Policy
FY2020	Launched streaming of the message from the president for Human Rights Day in the internal newsletter
FY2021	Created the Communications with an Inclusive Perspective of Human Rights handbook
FY2023	Established the Nikon Global Diversity, Equity & Inclusion Policy
FY2024	Conducted a human rights impact assessment and identified six salient human rights issues
FY2025	Revised the Nikon Human Rights Policy Established the Human Rights Subcommittee under the Sustainability Committee

\*1 The name of the organization on joining was the Conflict-Free Sourcing Initiative (CFSI). Its name was changed in 2018.

\*2 An international industry coalition dedicated to corporate social responsibility in global supply chains (labor, occupational health and safety, environment, and ethics).

## E-Learning for Human Rights

In fiscal year 2024, course materials covered the relationship between business and human rights, DEI, and unconscious bias, with a 83% e-learning participation rate in Japan. Overseas, the Sustainability Department of each regional headquarters leads the implementation of topics incorporating the issues of their respective regions.

## Human Rights Events

We hold events for World Human Rights Day in December, mainly for employees in Japan. In addition to broadcasting a special message from the president, we hold talk events (seminars on DEI and conflict minerals with outside speakers and case studies of internal initiatives on DEI) over a period of about one month. We also give away DEI-related goods to participants.

Promoting CSR Procurement → **p.096**

## Compliance with the UK Modern Slavery Act

The Nikon Group has released a statement on our website in accordance with the UK Modern Slavery Act (enacted in 2015).



Nikon Group Slavery and Human Trafficking Statement for the fiscal year ended March 2025

## Labor Relations

The Nikon Group respects basic labor rights and is committed to human rights as described in the Nikon Human Rights Policy following the International Labor Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work.

At Nikon, the Nikon Labor Union has been organized as an organization representing employees. The Nikon Labor Union is affiliated with the Japanese Association of Metal, Machinery, and Manufacturing Workers (JAM), an industrial labor union that mostly consists of workers in the metal, machinery, and manufacturing industries. As of March 31, 2025, the Nikon Labor Union had 4,282 members, and 78.7% of Nikon employees were members of the union. We make every effort to hold in-depth discussions with the Nikon labor union prior to implementing measures related to personnel systems and work styles. We also hold labor-management study meetings as necessary to exchange opinions.

At Group companies in Japan, Nikon Labor Union branch or employee-elected representatives are responsible for discussing issues with their company. At Group companies outside Japan, issues are discussed either by the company's in-house union or through consultations with an outside labor union to which employees belong. At companies where there is no labor union, we hold briefings for all employees, dialogues with employee groups, and face-to-face meetings with individual employees.

When ordering an employee to change the job description and/or work location, the Nikon Group consults

with the labor union or employee representative and informs the employee within a sufficient period of time prior to the effective date (Effective Date). Nikon, for example, sends preliminary notifications to eligible employees within the following timeframes, as a general rule

Types of Transfers	Approximate Timing of Preliminary Notification
Transfers not involving a change of residence	Up to one week prior to the Effective Date
Transfers involving a change of residence Transfers involving a change in work location Temporary leave of absence and reinstatement due to secondment within Japan	Up to one month prior to the Effective Date
Temporary leave of absence and reinstatement due to secondment overseas	Up to three months prior to the Effective Date