

CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

Governance

Corporate Governance

Risk Management

Information Security and Cybersecurity

Thorough Compliance

Corporate Governance

Basic Approach

Based on our Corporate Philosophy, the Nikon Group will conduct operations in a highly transparent manner in order to fulfill our fiduciary responsibilities to shareholders as well as responsibilities to all stakeholders, including customers, employees, business partners, and society, with a sincere and diligent attitude.

The Nikon Group will strive to achieve sustainable growth and enhancement of corporate value over the medium to long term by improving management efficiency and transparency, and further strengthening the supervisory function over management in light of the purpose behind Japan's Corporate Governance Code.



▶ Corporate Governance Guidelines

Strategy

Risk

A governance system that fails to ensure fair and transparent management will lead to a decline in stakeholder confidence. At the same time, this type of failure reduces the effectiveness of the Board of Directors. The resulting environment is not conducive to appropriate risk-taking, which may result in lost business opportunities and may impede a company's sustainable growth.

Opportunities

Effective, fair, and transparent governance strengthens a company's resilience, maintains and enhances stakeholder trust, and creates an environment that supports appropriate risk-taking. Supported in this way, a company captures and expands business opportunities.

The resulting environment is stable management and sustainable growth of the company in question.

Strategy

Nikon fulfills our responsibilities to stakeholders and implements highly transparent management, while improving management efficiency and transparency, and further strengthening the supervisory function over management for sustainable growth and enhanced corporate value over the medium to long term. To reach higher levels of supervisory functions, the Company continues to evaluate the effectiveness of the Board of Directors, resolving issues raised in said evaluations.

We also enhance the effectiveness of the Board of Directors by increasing diversity and improving the executive compensation system. Through these efforts, we achieve the goal of strengthening our management base as described in our Medium-Term Management Plan.

History of Enhancing Corporate Governance

|                                                       |                                              | - FY3/2022                                                                                                                                                                                  | FY3/2023                                                        | FY3/2024                                                                                                 | FY3/2025                                           | FY3/2026          | FY3/2027                                                                                             |
|-------------------------------------------------------|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|----------------------------------------------------|-------------------|------------------------------------------------------------------------------------------------------|
| Increasing Board of Directors' diversity              | % of external directors                      | 45% (5 out of 11) <sup>*1</sup>                                                                                                                                                             | 45% (5 out of 11)                                               | 50% (6 out of 12)                                                                                        | 55% (6 out of 11)                                  | 55% (6 out of 11) | 55% (6 out of 11)                                                                                    |
|                                                       | o/w % of those from major shareholders, etc. | 40% (2 out of 5) <sup>*1</sup>                                                                                                                                                              | 0%                                                              | 0%                                                                                                       | 0%                                                 | 0%                | 0%                                                                                                   |
|                                                       | % of female directors                        | 9% (1 out of 11) <sup>*1</sup>                                                                                                                                                              | 9% (1 out of 11)                                                | 17% (2 out of 12)                                                                                        | 18% (2 out of 11)                                  | 18% (2 out of 11) | 18% (2 out of 11)                                                                                    |
| Improving the effectiveness of the Board of Directors | Chairman of the Board                        | FY3/2020<br>●Separation from the position of officer<br>FY3/2021<br>●Separation from the representative director (strengthening of supervisory function over management)                    |                                                                 |                                                                                                          |                                                    |                   |                                                                                                      |
|                                                       | Nominating Committee                         | FY3/2020<br>●Established (Chair: External director)                                                                                                                                         |                                                                 |                                                                                                          |                                                    |                   |                                                                                                      |
|                                                       | Compensation Committee                       | FY3/2004<br>●Established<br>FY3/2020<br>●Changed chair to an external director                                                                                                              |                                                                 |                                                                                                          | ●Majority of members changed to external directors |                   |                                                                                                      |
|                                                       | Independent External Directors' Meeting      |                                                                                                                                                                                             | ●Establishment                                                  |                                                                                                          |                                                    |                   |                                                                                                      |
|                                                       | Effectiveness evaluation                     | ●Continuation of consideration and implementation cycles for improvement measure based on the results of the evaluation of Board of Directors' effectiveness conducted in the previous year |                                                                 |                                                                                                          |                                                    |                   |                                                                                                      |
| Nominating                                            | Succession Planning for President            | FY3/2020<br>●Formulation of the plan<br>FY3/2021<br>●Commencement of implementation<br>FY3/2022<br>●Full-scale implementation                                                               |                                                                 | ●President was selected for the first time since the establishment of Nominating Committee <sup>*2</sup> |                                                    |                   |                                                                                                      |
| Compensation                                          | Performance-based stock remuneration         | FY3/2020<br>●Resumption of officer compensation system linked to the Medium-Term Management Plan                                                                                            | ●Determined KPIs based on 2022-2025 Medium-Term Management Plan |                                                                                                          |                                                    |                   | ●Revised officer remuneration and determined KPIs based on the 2026-2030 Medium-Term Management Plan |

<sup>\*1</sup> Composition of the board of directors as of FY3/2022 <sup>\*2</sup> The change of president was in April 2024

CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

Governance

Corporate Governance

Risk Management

Information Security and Cybersecurity

Thorough Compliance

Organizations

Aiming to further enhance corporate governance, Nikon adopted a company with an Audit and Supervisory Committee. This position further strengthens the supervisory function of the Board of Directors as it strives to streamline decision-making and clarify management responsibility arising through the delegation of authority. In addition, we recognize the importance of identifying, evaluating, and managing risks that may have a significant impact on corporate management and business continuity. Based on this recognition, the Risk Management and Compliance Committee strives to develop systems to manage risks appropriately, including identifying risks affecting the Nikon Group and determining appropriate policies in response.

Sustainability Promotion System ▶ p.010

Risk Management and Compliance Committee ▶ p.108

- Web
- ▶ Corporate Governance Organization
  - ▶ Internal Control System
  - ▶ Basic Policy on Internal Control System
  - ▶ General Shareholders' Meeting

Risk Management

The Board of Directors consists of a majority of Independent External Directors. The Company identifies governance issues by striving to increase diversity and transparency in this way. At the same time, committees and the Board of Directors examine issues, strengthening management over governance-related risks.

- Web
- ▶ Corporate Governance Organization

Main Initiatives

Evaluation of the Board of Directors' Effectiveness

Nikon asks a third-party organization to analyze and evaluate the effectiveness of our Board of Directors in order to further improve our functions. See the Nikon corporate website for more on issues raised during the fiscal year 2025 evaluation and future responses.

- Web
- ▶ Evaluation of the Board of Directors' Effectiveness

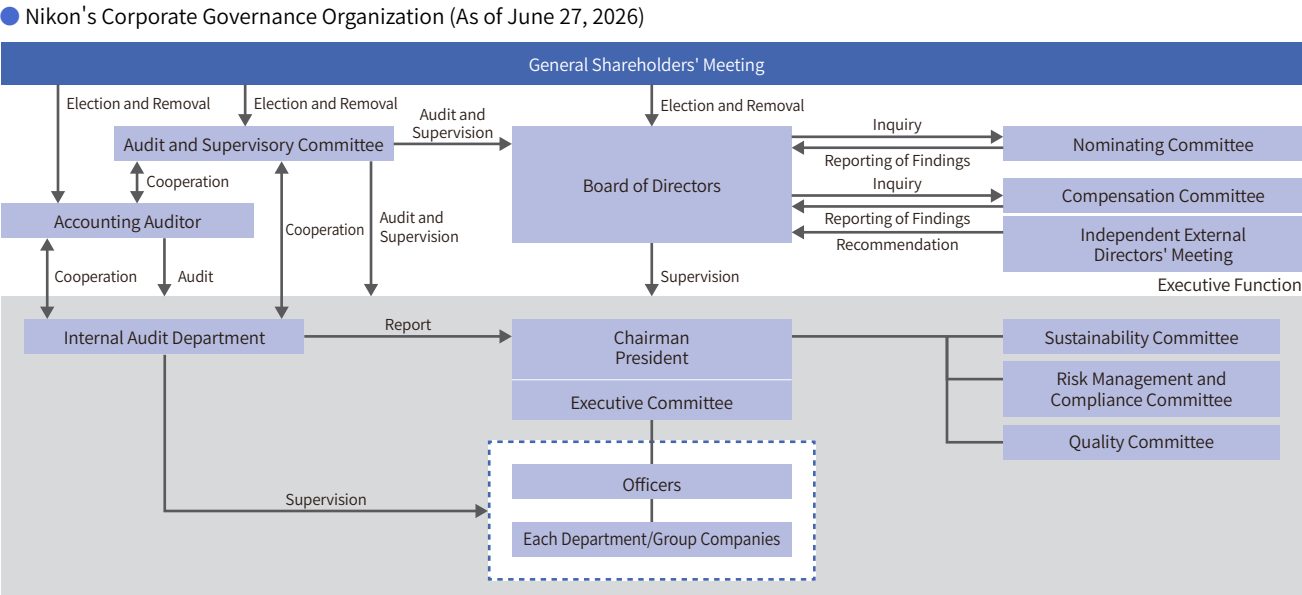
Independent External Directors' Meeting

The Company established the Independent External Directors' Meeting in October 2022. The meeting membership consists of all of the Company's external directors, and serves as an opportunity for the members to freely exchange opinions and have discussions from an independent and objective standpoint about issues and matters to be deliberated by the Board of Directors. Based on the results of this meeting, the Independent External Directors' Meeting makes proposals to the Board of Directors and helps stimulate discussions at Board meetings.

Taxation

Taxes have a significant impact on the development of local communities, and proper payment of taxes is an important corporate social obligation. In its Nikon Code of Conduct, the Nikon Group stipulates conduct that is in compliance with applicable tax laws and regulations as well as open and honest dialogue with tax authorities. We have also established the Global Tax Policy, which has been approved by the Board of Directors, in order to improve tax compliance and strengthen governance.

Based on this policy, the Nikon Group will implement tax compliance measures that are aligned with management policy and management of taxation that is consistent across the Group. The Nikon Group CFO is responsible for tax governance. Tax compliance



# CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

## Governance

### Corporate Governance

Risk Management  
Information Security and Cybersecurity  
Thorough Compliance

is delegated to the tax department within each Group company, and each regional headquarters is responsible for managing their respective region. Tax management and compliance for the entire Nikon Group is the responsibility of the tax department within Nikon's Finance & Accounting Division.

Each regional headquarters conducts quarterly monitoring of Group companies in its region and implements appropriate countermeasures in response to regional tax risks and in order to effect awareness of and compliance with this policy. Furthermore, the tax team at Nikon's Finance & Accounting Division receives reports from each regional headquarters, based on which it provides supervision and support and addresses issues that cross regional lines.

The tax team at Nikon's Finance & Accounting Division also regularly reports to the CFO on the status of tax governance. In addition, the CFO submits these reports to the Board of Directors as appropriate.

Looking ahead, the Nikon Group endeavors to respond appropriately to changes in conditions and tax risks pertaining to tax governance in and outside Japan.

### Details on Corporate Governance

Refer to our website for more information on corporate governance.



▶ Corporate Governance

● Fiscal Year 2024 Tax Payments by Region (million yen)

| Region      | Tax payment |
|-------------|-------------|
| Japan       | 2,938       |
| USA         | (84)        |
| Europe      | 2,523       |
| China       | 673         |
| Other Areas | 2,145       |
| Total       | 8,195       |

\* Results for the fiscal year ended March 2025



▶ Global Tax Policy

CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

Governance

Corporate Governance

Risk Management

Information Security and Cybersecurity

Thorough Compliance

Risk Management

Basic Approach

External risks have increased in recent years due to geopolitical risks, expanding information security threats driven by digital innovation, climate change, and other factors.

Our business environment also faces significant impacts from broader societal and economic conditions, including rising policy interest rates aimed at curbing inflation in various countries, higher tariffs, the weak yen, and major market changes. Failure to respond appropriately to risks arising from these factors could result in the loss of trust among customers, shareholders, and other stakeholders, and may lead to damages that affect the continuity of our company.

On the other hand, managing risks not only minimizes the impact of issues like fraud or accidents but also supports risk-taking as a means of executing business strategy.

The Nikon Group manages increasingly diverse risks while also addressing internal factors related to those risks, including failure to achieve targets under the Medium-Term Management Plan. In doing so, we accurately identify and prioritize key management risks, avoid and mitigate risks, and pursue appropriate risk-taking. Through these efforts, the Nikon Group supports business development aligned with management strategies while driving sustainable growth and ensuring long-term profitability.

Strategy

The Nikon Group surveys risks identified internally and risks perceived externally to understand the risks facing the Group and identify key risks requiring close attention in business operations (including key strategic risks and key operational risks). Business units and administration departments identify key risks that have a significant impact on their respective operations under the Medium-Term Management Plan and incorporate these risks into their respective targets and measures.

Related Information

Our Consolidated Financial Results contains additional information about business and other risks within analysis of management performance and financial conditions.

 [Annual Securities Report \(in Japanese only\)](#)

Governance

Risk Management and Compliance Committee

To properly respond to risks that might critically impact corporate management, the Nikon Group established the Risk Management and Compliance Committee. The committee is chaired by an officer serving as chief risk management officer (CRO), while the Group Governance & Administration Department and Compliance Department serve as the secretariat and committee members include members of the Executive Committee. The Risk Management and Compliance Committee meets twice a year and strives to build a framework to monitor priority risks and provide prompt support. In April 2026, Nikon also established the Information Security Committee under the Risk Management and Compliance Committee.

- Main Agenda Items at the Risk Management and Compliance Committee Meeting in FY2025
- Strengthened risk management and Group governance
    - Identification of key risks for the next Medium-Term Management Plan and communication of those risks to each unit
    - Identify key unit-level risks and establish countermeasures as part of the development of the next Medium-Term Management Plan
    - Implement measures to strengthen second-line functions at the Head Office and Regional Headquarters
  - Enhanced information security
    - Isolated critical assets and migrated privileged administrators to strong authentication as part of identity protection measures
    - Enhanced product security and establish processes to address regulatory requirements, including the EU Cyber Resilience Act
    - Introduced information security training tools for employees
    - Established security management for critical suppliers

Risk Management Framework

The Nikon Group implements our risk management framework through three lines of defense. These lines consist of business divisions, administration departments, and internal audit divisions, respectively.

The first line consists of departments responsible for conducting business with customers and managing business operations. These departments maintain risk ownership, manage operational risks, and assume responsibility.

The first line identifies risks arising from day-to-day business processes (i.e., internal misconduct, system errors, human error, and external factors), evaluates impact on the business, and determines countermeasures. This line identifies and evaluates risks associated with the development of new products and services and entry into new markets and determines countermeasures in the same manner as for day-to-day operations.

Risk response at this level includes the design and implementation of controls embedded in business processes to maintain risks within acceptable levels. Other risk prevention and mitigation methods include implementing training and procedural manuals.

When risks arise, the first line reports and escalates information appropriately on the status of the risk and control measures to the second line of defense (the Risk Management Department).

The second line identifies and monitors key risks that could threaten the maximization of corporate value and sustainable growth through the Risk Management and Compliance Committee. Each second-line department evaluates the company-wide impact of these risks, as well as the impact on business units, and establishes organizational rules and policies. The second line also monitors compliance with these rules, policies, and external laws and regulations on a continuous basis. Furthermore, the second line supports first-line risk controls and assessments while working to prevent incidents and minimize damage.

The third line of defense conducts audits from a position independent of business execution divisions and objectively

# CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

Governance

Corporate Governance

Risk Management

Information Security and Cybersecurity

Thorough Compliance

evaluates the effectiveness of internal controls implemented by the first and second lines. Audit plans are formulated by the third line based on the Group's risk profile using a risk-based approach and covers key areas that include internal controls over financial reporting. Audit activities include verifying business processes, evaluating the effectiveness of controls, making recommendations for improvements, and conducting regular follow-up. The third line also promptly escalates significant unresolved issues and reports audit results and recommendations for improvements directly to the president and the Audit and Supervisory Committee, which oversees audits from the stand point of non-executive directors. While maintaining independence, this line also works with the first and second lines as necessary to confirm the effectiveness of corrective actions.

### Cooperation With Related Committees

While the Risk Management and Compliance Committee has jurisdiction over all risks, the committee works in coordination with subordinate committees, the Sustainability Committee, and other relevant committees and subcommittees to address risk that require specialized responses.

● Main Specialist Committees Involved in Risk Management (Since April 2026)

| Committees                               | Principal Risks                                                                                                                               |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| Risk Management and Compliance Committee | General risks and compliance                                                                                                                  |
| Quality Committee                        | Quality                                                                                                                                       |
| Export Control Committee                 | Prevention of foreign exchange law violations and security risk management                                                                    |
| Sustainability Committee                 | Sustainability in general, especially environmental (climate change, chemical management, water, etc.), social and labor (human rights, etc.) |
| Bioethics Review Committee               | Bioethics                                                                                                                                     |
| Information Security Committee*          | Information security, cybersecurity                                                                                                           |

\* Subordinate committee of the Risk Management and Compliance Committee

## Risk Management

The Nikon Group conducts a risk identification survey each year to assess and understand risks facing the Group. We conduct this survey with Nikon department managers and presidents of Group companies in and outside Japan to identify, analyze, and evaluate company-wide key risks and monitor response status.

We then analyze risk identification surveys with high response volume or significant impact based on the results and incorporate external perspectives to create a risk correlation map and identify key risks. The Risk Management and Compliance Committee determines which issues require stronger action.

Management takes the lead in addressing identified key risks related to company-wide strategies, while each business unit takes the lead in addressing risks related to individual businesses.

Identified key risks represent those that have a continuous, significant impact on management and a medium to high frequency or impact in day-to-day operations.

The Risk Management and Compliance Committee identifies top-priority risks that require specialized responses from a management perspective based on information from the Sustainability Committee, the Quality Committee, and the Export Control Committee, a subordinate committee under the Risk Management and Compliance Committee. The Risk Management and Compliance Committee then issues directions for action and manages progress of these risks.

The Board of Directors receives these reports and supervises Nikon Group risk and risk management overall. Furthermore, teams that include at least one qualified auditor and that the Internal Audit Department assigns to conduct annual internal audits verify the appropriateness of risk management based on the Global Internal Audit Standards issued by The Institute of Internal Auditors.

We will incorporate responses to identified key risks into the new Medium-Term Management Plan. Based on the measures and progress within relevant departments, we will define policies for the Risk Management and Compliance Committee and strengthen the risk management framework while working to mitigate risks.

## Main Initiatives

### Risk Management Education

Ensuring that each employee maintains appropriate risk literacy and pursues sound risk-taking is essential for companies. The Nikon Group believes that managers and senior employees in particular must maintain strong risk awareness and risk identification and management skills to avoid and mitigate management risks and pursue appropriate risk-taking.

With this belief in mind, the Nikon Group uses the annual Enterprise Risk Assessment Survey, conducted with Nikon department managers and presidents of Group companies in and outside of Japan, as an opportunity to raise awareness and understanding of risks. The Nikon Group also provide all employees with training on individual risk areas, including information security, competition law, foreign exchange and foreign trade laws, personal information protection laws, the Code of Conduct, insider trading regulations, and corporate tax calculations and tax compliance. We also incorporate compliance seminars for executives. In addition, the Nikon Group organizes regulations applicable to Nikon and Group companies, enters into management agreements to ensure compliance, and shares educational materials on our portal site to deepen understanding among responsible personnel.

# CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

## Governance

Corporate Governance

### Risk Management

Information Security and Cybersecurity

Thorough Compliance

## BCM\* Activities Measures

The Nikon Group establishes BCM\* implementation guidelines and initial response manuals in preparation for large-scale disasters, infectious disease outbreaks, and other emergencies. We review these guidelines regularly.

We also review coordination systems among business units, plants, and subsidiaries on an ongoing basis to strengthen initial response and recovery capabilities during emergencies.

\* Business Continuity Management (BCM): Typical management activities such as BCP formulation, updates, and maintenance, as well as the implementation of proactive measures, education, trainings, inspections, and continuous improvements.  
Business Continuity Plan (BCP): A plan describing the policy, systems, procedures, etc., by which corporations can avoid suspension of critical business activities, or can restore critical business quickly if it is interrupted, even when unforeseen contingencies arise, including natural disasters such as major earthquakes, pandemics, etc.

## Responding to Emerging Risks

The Nikon Group works to prevent incidents and minimize damage through early detection, analysis, evaluation, and response to emerging risks that newly arise or rapidly increase in importance due to rapid environmental changes as part of our risk management activities.

### Emerging Risk: Cybersecurity

Risks arising from cyberattacks are escalating due to the malicious use of AI, increasingly sophisticated automated attacks, and the expansion of connected products and supply chains. Against this backdrop, the Nikon Group faces an urgent need to strengthen our security response system, while our key customers also demand stronger security measures with clearly defined accountability. In addition, Nikon products now require stronger security measures in response to tighter European regulations, creating an emerging risk driven by external factors that traditional operations alone cannot adequately control.

Failure to implement appropriate countermeasures against this risk could result in the following impacts.

- Lower revenues and higher costs resulting from production

shutdowns, as well as delivery delays and recovery expenses caused by IT/OT disruptions

- Loss of market share resulting from fewer orders and contract cancellations caused by confidential information leaks and loss of trust
- Increased penalty and litigation risks, product modification costs, and system enhancement costs resulting from regulatory violations

The Nikon Group strengthens measures in the following three areas to address these risks.

- Strengthening company-wide controls and resilience: Establish a global management system and prepare for business interruption risks
- Establishing reliable defenses and strengthening supplier management: Transition to new connectivity frameworks, ensure product reliability, and strengthen supplier management
- Improving operational efficiency and expanding workforce capabilities: Sharpen AI-driven defenses and strengthen human risk assessment capabilities

CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

Governance

Corporate Governance

Risk Management

Information Security and Cybersecurity

Thorough Compliance

Information Security and Cybersecurity

Basic Approach

At the Nikon Group, we believe that our information assets are the foundation of our corporate activities, and we treat information assets in accordance with the Nikon Group Information Security Policy. We have established several internal rules based on this policy and pursue information management that complies with the laws and regulations of each country and region. These rules and regulations are always available to employees via the corporate intranet portal. We continue to improve the level of operation through periodic education and compliance status checks.



▶ Nikon Group Information Security Policy

Strategy

Risk

Nikon may face operational disruptions and financial losses, including reduced revenue, in the event of a cyberattack that compromises our systems. Theft or leakage of confidential or personal information may also lead to reputational damage to our information management, resulting in a loss of trust in our company, and potential claims for damages.

Opportunities

Conducting proper information security measures and information asset management enables us to reduce our risk of cyberattacks. These measures help improve information availability, support business continuity, and enhance trust in the Nikon Group.

Strategy

The Nikon Group engages in systematic information security measures and information asset management to ensure business continuity and to enhance the trust of society. In the short-to-medium term, we intend to improve governance and cyber resilience incorporating zero-trust thinking, in addition to enhancing risk response and global security structure in connection with the use of AI. Over the long term, we will pursue preemptive risk management and the establishment of a security culture throughout the company. In this way, we aim to establish a company-wide risk management system that supports sustainable improvements in enterprise value.

Governance

The Nikon Group appoints the president as the head of information management, including personal information protection. We also established operating processes in accordance with Information Security Management Systems (ISMS\*). The Information Security Department, under the supervision of the president, manages these operating processes and oversees them across the entire Group.

In addition, the heads of each organization of Nikon's business units, divisions, and Group companies are designated as information managers. By working with the Information Security Department, these individuals are establishing an information security management system compatible with the situation in each country and region, while comprehensively managing the entire Nikon Group.

The Information Security Department reports material matters involving information asset risks to the Information Security Meeting and the Risk Management and Compliance Committee (renamed in April 2025), which includes Executive Committee members. The department then translates the reported material matters into strategies and policies, and reports to the Information Security Meeting and the Risk Management Committee. The

department also sets measurable targets for these strategies and policies and tracks performance.

\* ISMS: Information Security Management System

Healthcare Business Unit Initiatives

In the Healthcare Business, Nikon works to expand business in information services centered on digitalization, including support for network-based remote diagnosis and services that store and manage cloud-based pathology images. As business expands, we will be faced with handling more personal medical information for subjects and patients, which requires strict management at medical institutions. Given these circumstances, Nikon works to ensure thorough information security management. We not only increased the number of organizations subject to ISO 27001 in December 2023, but we also obtained ISO 27017 certification (a code of practice in information security management for cloud services) and launched operations.

Risk Management

The Nikon Group has created a security risk map that assesses the frequency and impact of risks. In connection with this map, we develop plans and implement response measures according to priority. We evaluate the effectiveness of these measures at the Information Security meetings, after which we incorporate the evaluation results in measures for the next fiscal year and beyond. In this way, we strengthen and improve the risk management process on an ongoing basis. Through these efforts, we identify risks systematically throughout the Group and improve security controls across the organization.

# CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

## Governance

Corporate Governance

Risk Management

Information Security and Cybersecurity

Thorough Compliance

## Main Initiatives

### Response to Information Security Incidents

The Nikon Group clearly defines information security incidents under the Nikon Group Information Management Rules. These regulations require the reporting of incidents from the department impacted to the Information Security Department. The Information Security Department works with relevant divisions to unify procedures from initial response to containment, impact assessment, and recovery, striving to minimize damage and impact, while resuming business operations promptly. Serious cases are promptly escalated to the responsible officer (CISO) for systematic decision-making and response.

In fiscal year 2025, we conducted an incident response drill with relevant divisions to confirm the effectiveness of our response procedures and communication system.

We have noted no serious information security incidents involving fines or compensation payments over the past three years.

### Information Security Education

The Nikon Group conducts information security e-learning education programs as part of new employee training, etc., in order to raise employee awareness of information security and improve skills related to information security management. Beyond information management policies and rules, educational programs are designed to teach risk recognition and response methods based on actual case studies.

In addition, the Nikon Group Information Security Handbook, an educational document that provides easy-to-understand explanations of internal rules and the latest policies, is published on the portal site for all employees to refer to at any time. In this way, we make sure that every employee understands the importance of information asset management and complies with the rules based on a high level of awareness.

In fiscal year 2025, we started to roll out the information security education platform introduced to the Nikon Group in Japan in fiscal year 2024 to Group companies outside Japan, and began regular global e-learning education.

### Information Security Audit

The Nikon Group periodically conducts internal audits pursuant to the Nikon Group Information Management Rules to confirm the appropriate implementation of information security measures.

In fiscal year 2025, we conducted written audits of all Group companies and divisions in Japan, as well as on-site audits of selected divisions based on key focus areas. We found no major nonconformities as a result of the audits.

In fiscal year 2026, we continue to conduct audits of key focus areas and verify the operational status of measures to ensure ongoing improvement throughout the Group.

### Personal Information Protection

The Nikon Group has established the Nikon Group Privacy Protection Statement based on our respect for privacy and acknowledgment that processing personal data in a lawful and proper manner is an important social responsibility.

Additionally, under this statement, we established the Nikon Group Personal Data Processing Rules as a common set of rules covering the entire Group. We are now working to make these rules known within the Group and ensure that personal data is handled in accordance with these rules under the information management system. We conduct a questionnaire-based survey on the status of compliance with the Nikon Group Personal Data Processing Rules roughly once a year.

In addition, the Compliance Department oversees matters related to personal information and manages risk related to privacy and personal information for the entire Nikon Group.

Our specific initiatives include posting privacy notices on the website of each Nikon Group company in accordance with

relevant laws and regulations, and notifying customers of contact information for support regarding privacy and individual rights. This includes the purpose of use of personal information and how to delete their personal information.

In addition, we request that procurement partners follow the Nikon CSR Procurement Standards in order to maintain information security, including privacy protection.



- ▶ Nikon Group Privacy Protection Statement
- ▶ Privacy Notice of Nikon Europe B.V. in accordance with the EU General Data Protection Regulation (GDPR)
- ▶ Nikon CSR Procurement Standards

# CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

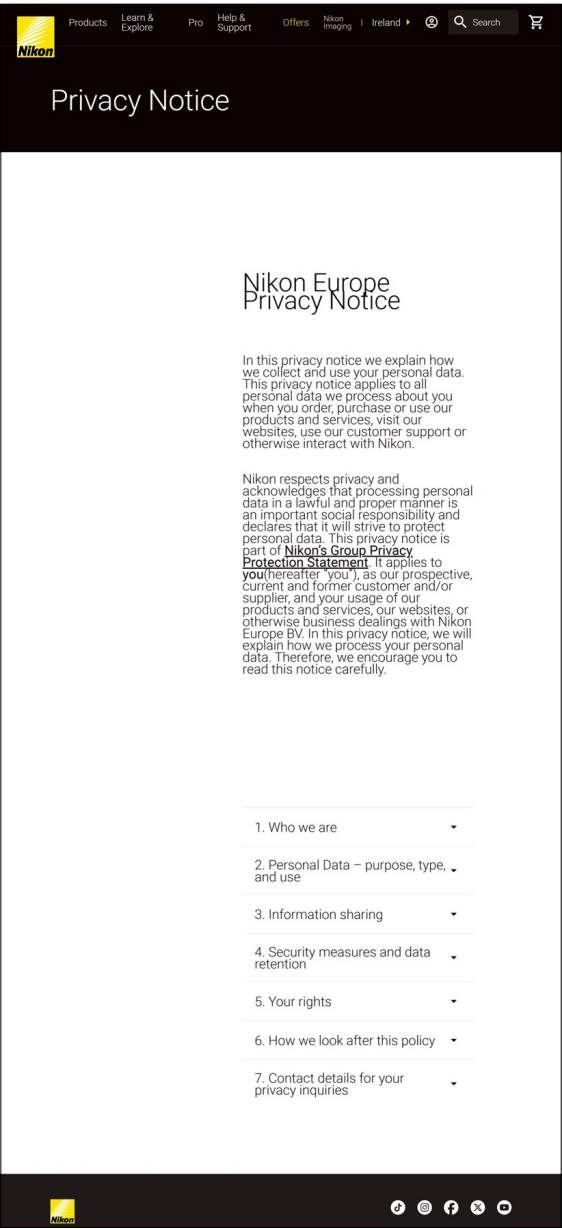
Governance

Corporate Governance

Risk Management

Information Security and Cybersecurity

Thorough Compliance



Privacy Notice of Nikon Europe B.V. in accordance with the EU General Data Protection Regulation (GDPR) (excerpt)

## Response to the Personal Information Protection Laws of Each Country

The Nikon Group continuously monitors legislative developments related to personal data protection laws in each country and region, including the EU General Data Protection Regulation (GDPR), to ensure proper management of personal information under a robust information security system.

In fiscal year 2026, we will continue to take necessary actions in line with the enactment or revision of personal information protection-related laws and regulations in each country and region.

## Improving Cybersecurity Infrastructure and Processes

The Nikon Group has established a comprehensive security system to improve cyber resilience to minimize the impact on business. Infrastructure protection promotes advanced governance through a combination of perimeter protection and zero-trust thinking. In addition, we visualize public assets at all locations as part of external surface threat management, and continuously monitor and correct misconfigurations in the cloud environment to prevent information leaks.

Furthermore, we continue to strengthen the process of ensuring safety from the early stages of development through detailed security by design in our products and services.

CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

Governance

Corporate Governance

Risk Management

Information Security and Cybersecurity

Thorough Compliance

Thorough Compliance

Basic Approach

The Nikon Group believes that our business is rooted in every member acting with integrity and fairness under our corporate philosophy of Trustworthiness and Creativity. Therefore, we established the Nikon Code of Conduct to stipulate our basic stance toward social responsibility and the standards for all officers and employees working for the Group to behave in a sensible manner with high ethical standards.

The Nikon Code of Conduct defines actions to be taken as a member of the Nikon Group on respecting human rights and sound working environments. The code also defines actions to be taken for all possible matters in daily business operations in the following categories: anti-bribery and corruption, relationships with business partners and social responsibility, fair competition and business transactions, import and export control, and taxation.

Our vision is to strive for zero compliance violations to ensure compliance with the Nikon Code of Conduct, and we are committed to ensuring each member is aware of this code.

 [▶ Nikon Code of Conduct](#)

Strategy

Risk

Serious compliance violations may lead to a loss of stakeholder trust and damage to our brand.

Opportunities

Daily business activities based on ethical and good-faith behavior and in accordance with international guidelines will maintain stakeholder trust and stabilize the continuity of our business. We also expect that ensuring sound working environments will improve overall workplace ethics and individual employee performance.

Strategy

The Nikon Group takes the following measures to achieve our Vision to strive for zero compliance violations.

- We will continue to provide training, as well as implement measures to ensure all employees are aware of the Nikon Code of Conduct. We will periodically review the Nikon Code of Conduct in light of stakeholder requests, trends in social issues, and the business activities of the Nikon Group.
- We will raise awareness of the reporting and consultation system, foster an environment that allows ease of use for employees, work to detect behavior that conflicts with laws and compliance in early stages, and resolve any issues appropriately.
- We will establish a system to respond in accordance with the culture, customs, laws, and regulations of each country and region.

Governance

Risk Management and Compliance Committee

The Nikon Group merged our Risk Management Committee and Compliance Committee into the Risk Management and Compliance Committee in April 2025. This merge enabled us to establish a system through which we can deliberate compliance risks as part of company-wide risk management. The committee is chaired by an officer serving as CRO (Chief Risk Management Officer). The committee deliberates and decides on measures related to key issues in compliance.

Risk Management and Compliance Committee ▶ [p.108](#)

- Main Agenda Items of the Risk Management and Compliance Committee (Compliance Part)

•Report of activities

•Compliance and disciplinary incidents

•Policy for future activities, and other topics

Promotion In and Outside Japan

In Japan, the Compliance Department undertakes compliance promotion activities in cooperation with compliance coordinators in each Nikon department and at Group companies, including liaison meetings with coordinators, etc. The Nikon Group also established a system in which the compliance departments at the Regional Headquarters and Group companies outside Japan cooperate with each other. This system aims to ensure that overseas initiatives are in line with the culture, customs, laws, and regulations of each country and region. The Compliance Department and compliance departments at the Regional Headquarters share information and collaborate in activities to train and raise awareness throughout the Group.

Nikon's Corporate Governance Organization ▶ [p.106](#)

CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

Governance

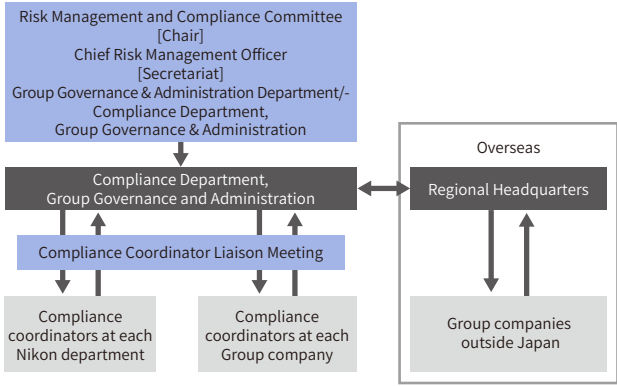
Corporate Governance

Risk Management

Information Security and Cybersecurity

Thorough Compliance

● Compliance Promotion Structure Diagram (As of April 1, 2026)



Risk Management

We identify and understand compliance-related risks based on employee awareness surveys and issues revealed through our reporting and consultation system, as well as the necessity for improvement and the status of operations. Starting in fiscal year 2025, the Nikon Group also began conducting risk assessments related to laws and regulations as part of Group-wide risk management initiatives. The Risk Management and Compliance Committee receives reports on these risks, and the committee secretariat works with relevant divisions to strengthen countermeasures, identify issues requiring close attention, and develop corrective actions. The secretariat also monitors these risks on a continuous basis to mitigate risks across the organization.

In the event of violations of employment rules or the Nikon Code of Conduct, the Nikon Group will take strict disciplinary action in accordance with internal regulations after investigating all related matters.

Main Initiatives

Ensuring Compliance With the Nikon Code of Conduct

The Nikon Code of Conduct is a specific set of standards that each and every employee should understand in depth and utilize to implement the concept of compliance.

Additionally, to ensure thorough compliance with the Code of Conduct across the Nikon Group, the heads or above of each department or equivalent organization at Nikon and the president of each Group company make a pledge each year to take responsibility for compliance with the Code of Conduct in the organizations of which they are in charge.

The Code of Conduct is translated into 15 languages and made publicly available to external parties. We also post the Code of Conduct on the Company intranet for all employees to reference whenever necessary. We also include processes that refer to the Code of Conduct in our regular compliance training to ensure awareness. In fiscal year 2025, we displayed posters to inform employees and spread understanding within the company.

 [▶ Nikon Code of Conduct](#)

Reporting and Consulting System (Code of Conduct Hotline)

The Nikon Group has included provisions regarding a reporting and consulting system in the Nikon Code of Conduct and has established such systems at all Group companies in and outside Japan in order to respond to reports of violations or potential violations of the Nikon Code of Conduct. The Compliance Department is responsible for internal consultation systems in Japan while advising overseas reporting and consulting systems and escalating issues from overseas to the head office. We also make employees aware of this system through written explanations on the Nikon Code of Conduct, accessible to all employees, and

relevant training programs.

In Japan, the Code of Conduct Hotline has been established as a unified reporting and consulting system for the Nikon Group in Japan (including non-consolidated Group companies). The Code of Conduct Hotline has both an internal contact point and an external contact point set up with a specialized vendor. The external contact point is available every day of the year except during the year-end and New Year holidays. In Japan, upon the enforcement of the revised Whistleblower Protection Act on June 1, 2022, an external contact point for cases related to heads of organizations and other executives has been established at a law firm handling whistleblower cases, and a full-time member of the Audit & Supervisory Board Committee is handling these cases.

In principle, each Group company outside Japan establishes its own external contact point with specialized firms and operates said contact point 24 hours a day, 365 days a year, in the local language(s). We also established our own internal contact points in Europe and Asia.

Reporting and consulting can be done anonymously. When violations or potential violations of the Code of Conduct are reported, we promptly investigate the facts and take steps to resolve the matter and prevent recurrence. For each case received through the system, information is gathered from the reporter and persons relevant to the matter in order to understand the issue objectively. We then work together with relevant departments to resolve the case and follow up as necessary. We treat each case with the utmost care by respecting human rights, which includes keeping the matter in strict confidence, protecting privacy, ensuring anonymity, and preventing any negative treatment as a result of using the system.

In fiscal year 2025, the Nikon Group as a whole received 201 reports through the reporting and consulting system. Cases related to employment, labor, and work environment were the most reported, with a total of 183 reports. Of these reports, 62 were related to discrimination and harassment. We received one report related to a conflict of interest and no reports related to insider trading.

CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

Governance

Corporate Governance

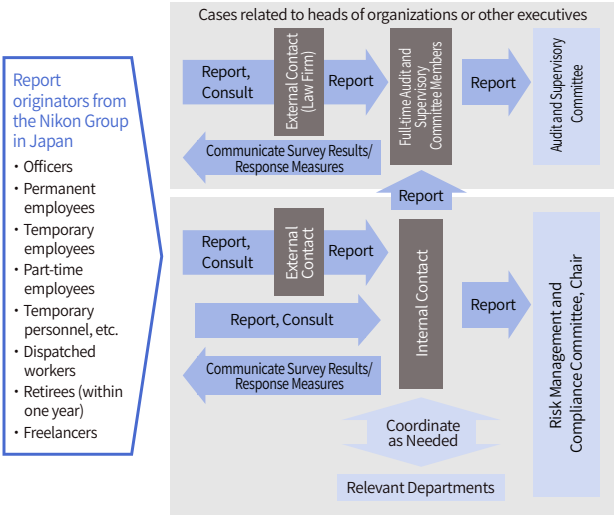
Risk Management

Information Security and Cybersecurity

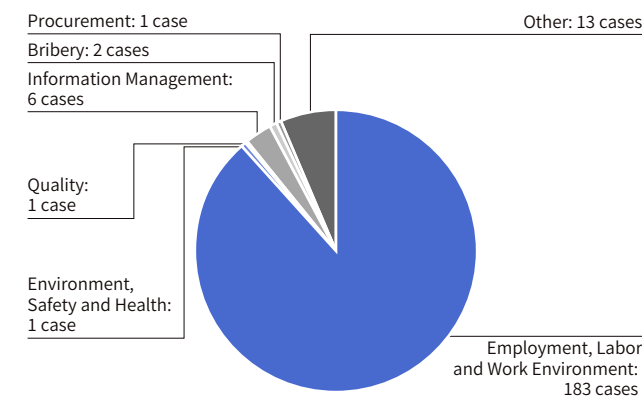
Thorough Compliance

To ensure that this reporting and consultation system is functioning properly, the secretariat operating the Code of Conduct Hotline reports regularly to the Compliance Committee on the development and operational status of the system, which is based on the regulations. The committee is also informed of the status of overseas operations.

● Diagram of the Reporting and Consulting System in Japan



● Fiscal Year 2025 Reporting and Consulting System Use Results (Report Details)



Note: Total number of consultations in and outside Japan. In cases where consultants make more than one report, each report is counted individually.

Compliance Training for Directors and Employees of the Nikon Group

The Nikon Group aims to instill an awareness of the concept of compliance in every person at the Nikon Group, from our top management to each and every employee.

At the March 2026 meeting of the Risk Management and Compliance Committee, a compliance seminar was conducted by the Compliance Department Manager for committee members, including Nikon's full-time directors. The seminar covered specific points of caution and required responses to management based on cases that have occurred within the Group.

For employees, we provide classroom training and e-learning. In fiscal year 2025, employees in Japan received training on various topics, including integrity and preventing power harassment, through compliance coordinators in each department and Group company. At Group companies outside Japan, Regional Headquarters take the lead in continuously implementing activities to train and raise awareness of the Code of Conduct.

● Fiscal Year 2025 Code of Conduct training results for all Nikon Group directors, officers, and employees: Participation rate: 94% (conducted through e-learning and other formats for approximately 26,000 employees)

Global Awareness Survey (Monitoring)

Nikon and Group companies conduct awareness surveys once a year for employees in and outside Japan. The survey enables the Nikon Group to assess the status of compliance awareness, the level of employee confidence in the reporting and consulting system, and the current adoption of Code of Conduct training, and leverage the survey results to improve our promotional activities.

We conducted a global awareness survey in fiscal year 2025 and reported the results to the Risk Management and Compliance Committee. We relayed survey results to each Nikon department and Group company and work to encourage awareness and address identified issues.

Looking ahead, the Nikon Group plans to use awareness surveys to establish a PDCA cycle for promoting compliance in all regions where we conduct business activities.

Anti-Bribery

The Nikon Group has established the Nikon Anti-Bribery Policy with the approval of the Executive Committee to reconfirm our commitment to anti-bribery both internally and externally. To ensure compliance with the Nikon Anti-Bribery Policy, each Regional Headquarters outside Japan formulates their own Anti-Bribery Guidelines under the direction of the Compliance Department. These guidelines reflect regional characteristics and summarize the business practices, precautions, and procedures necessary to comply with the policy regarding entertainment, gifts, donations, and other activities.

Specifically, we are taking steps to ensure full compliance with written application and approval procedures for expenditures related to public officials, etc. As a general rule, we have banned

# CONTENTS

Contents/Editorial Policy/  
Nikon Group Profile

Message From the President

Sustainability Management

Creating Value

Environment

Society

**Governance**

Corporate Governance

Risk Management

Information Security and Cybersecurity

**Thorough Compliance**

facilitation payments. In addition, at the start of transactions with third parties, such as intermediaries, Nikon makes the Nikon Anti-Bribery Policy known to all parties, and in principle, the contract must include a clause regarding anti-bribery.

The Compliance Department and Regional Headquarters outside Japan work continuously to communicate anti-bribery procedures, provide training, and verify implementation status.

The Nikon Group recorded no violations of anti-bribery laws or regulations and received no convictions in fiscal year 2025.



▶ Nikon Anti-Bribery Policy

**Prevention of Competition Law Violations**

As set out in the Free Competition and Fair Competition and Business Transaction chapter of the Nikon Code of Conduct, the Nikon Group's fundamental position is to carry out fair competition and engage in business deals that comply with the competition laws of each country.

In recent years, the international community has increased its focus on compliance with competition laws, requiring more stringent efforts to comply with these laws. Through this training, which the Nikon Group provides on an annual basis, we strive to promote and raise awareness of legal compliance across the entire Nikon Group, as well as prevent competition law violations.

**Training on Competition Law**

In order to provide competition law training that is in line with the laws and regulations of each country where we operate, the Nikon Group conducts training globally. Specifically, Nikon's Compliance Department takes the lead role in competition law training for the entire group, and the same department is in charge of training for the Nikon Group in Japan. Outside Japan, the legal department of each business operations site and each Group company prepares a curriculum and provides training with the assistance of local law firms as necessary.

In fiscal year 2025, the Nikon Group in Japan continued to implement e-learning programs, while outside Japan, training was provided based on the risks associated with each company's business activities.

**Responding to Misconduct**

In the event of violations of employment rules or the Nikon Code of Conduct, the Nikon Group will take strict disciplinary action in accordance with internal regulations after investigating all related matters.

In fiscal year 2025, we took serious disciplinary action in two cases based on misconduct in the Nikon Group. One case involved illegal conduct in an employee's private life (one individual involved). Another involved disciplinary action at a Group company in Japan for the fraudulent receipt of funds based on false reporting (one individual involved and one supervisor). There were no cases of serious disciplinary actions related to discrimination or harassment.

Nikon continually provides education for employees through our newsletters, e-learning, and other means to prevent the recurrence of misconduct.