

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

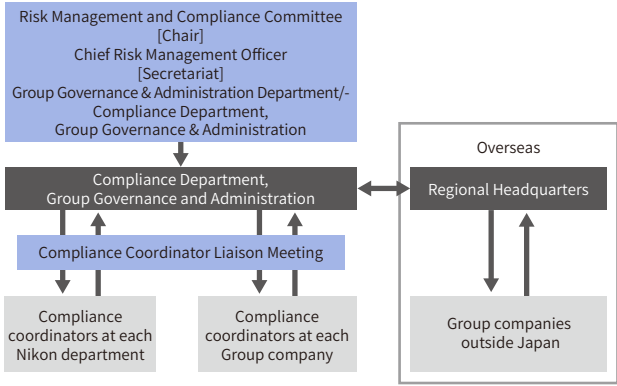
Corporate Governance

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

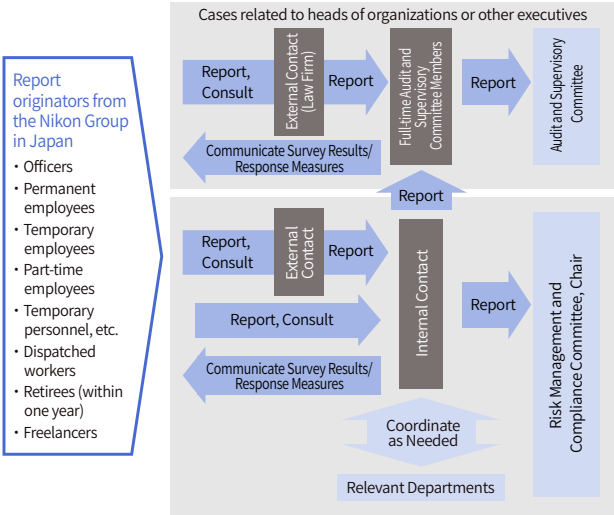
Risk Management

Information Security and Cybersecurity

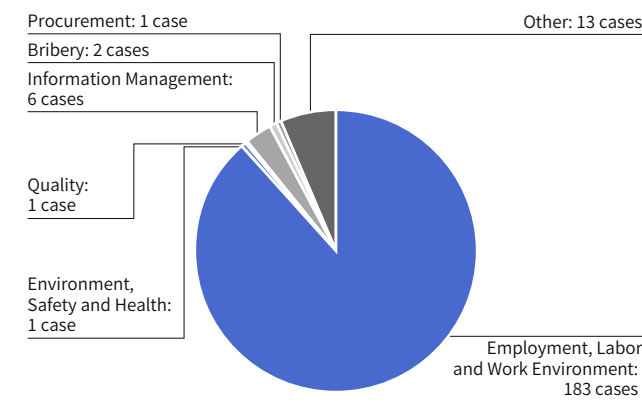
Thorough Compliance

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.