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Promoting CSR Procurement

Basic Approach

Nikon, as a global company, is committed to actively addressing social issues such as human rights, work environments, health and safety, and the environment in our supply chain, including among our procurement partners, through CSR procurement activities to meet society's expectations with trust and to realize a sustainable society. With this in mind, the Nikon Group has established the Nikon CSR Procurement Standards in accordance with the Responsible Business Alliance (RBA) Code of Conduct. We have published these standards in Japanese, English, and Chinese. We also review these codes of conduct and standards on a regular basis to ensure our own procurement activities are consistent.

Joining the RBA ▶ p.013

 ▶ Nikon CSR Procurement Standards

Compliance Requests

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

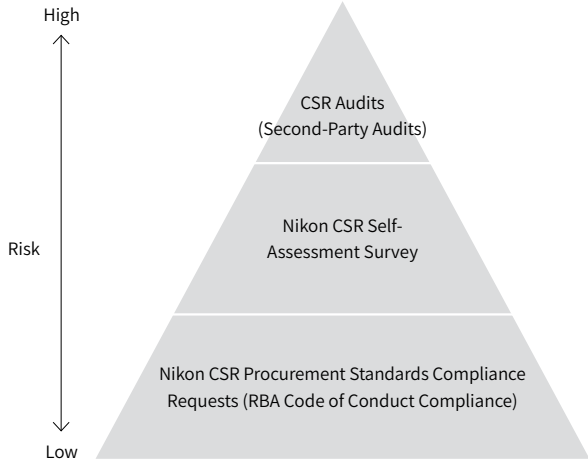
Procurement Partner Assessments

We conduct assessments of critical procurement partners in three-year cycles from fiscal year 2023 to 2025, and from fiscal year 2026 to 2028. We conduct the Nikon CSR Self-Assessment Survey for suppliers identified as Nikon Group critical procurement partners. These assessments ask partners to self-assess their implementation of the Nikon CSR Procurement Standards. The CSR Self-Assessment questionnaire is based on the RBA questionnaire and is conducted as an assessment of items related to human rights and human life,

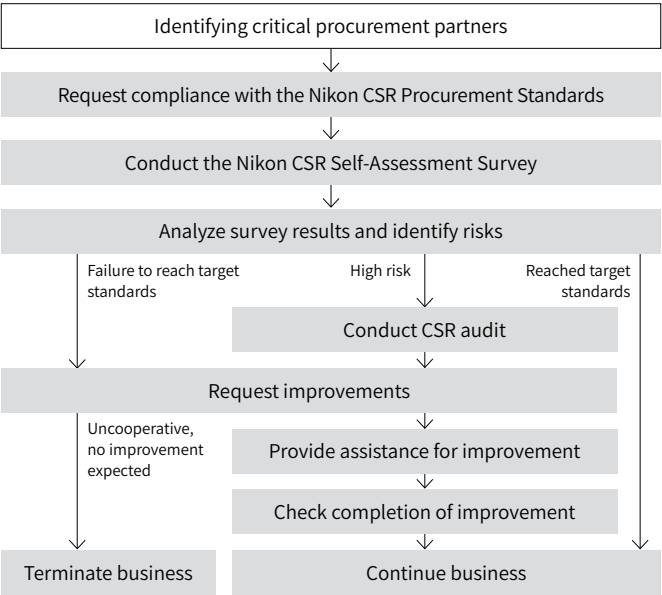
such as forced labor and child labor, with its own weighting. If the survey results do not meet the target standards, improvements are requested. Furthermore, we conduct CSR audits (second-party audits) of procurement partners that are particularly critical to our business or that we judge to be high-risk. We ask for improvements and provide assistance to address issues identified through the Nikon CSR Self-Assessment Survey and CSR audits, confirming that improvements have been completed. In principle, we confirm that improvement have been completed in the year following the year of the improvement request. If a serious violation of the Nikon CSR Procurement Standards is confirmed, or if a procurement partner does not cooperate sufficiently in a survey or audit or make any improvements to address issues, we will review our business relationship with the partner. Reviews may end in suspension of transactions or termination of contracts. In addition, we always conduct the Nikon CSR Self-Assessment Survey for new suppliers before entering into business contracts after confirming that they meet our standards.

*Nikon CSR audit: An audit conducted by a commissioned consultant in accordance with RBA auditing standards.

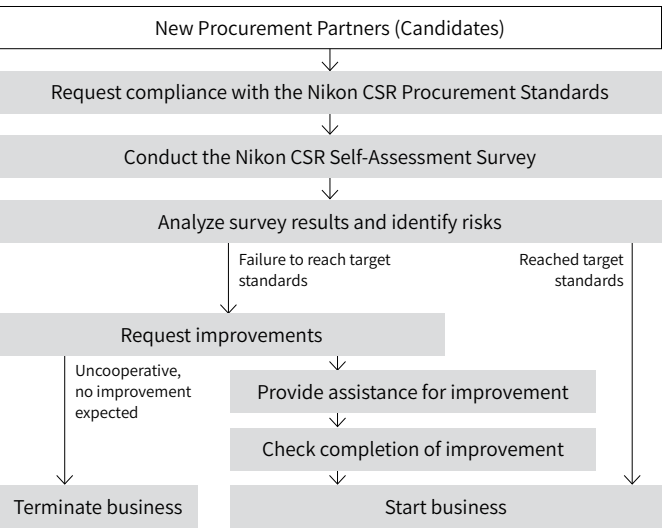
Risk-Based Procurement Partner Assessments



Flowchart of Critical Procurement Partner Assessments



Flowchart of New Procurement Partner Assessments



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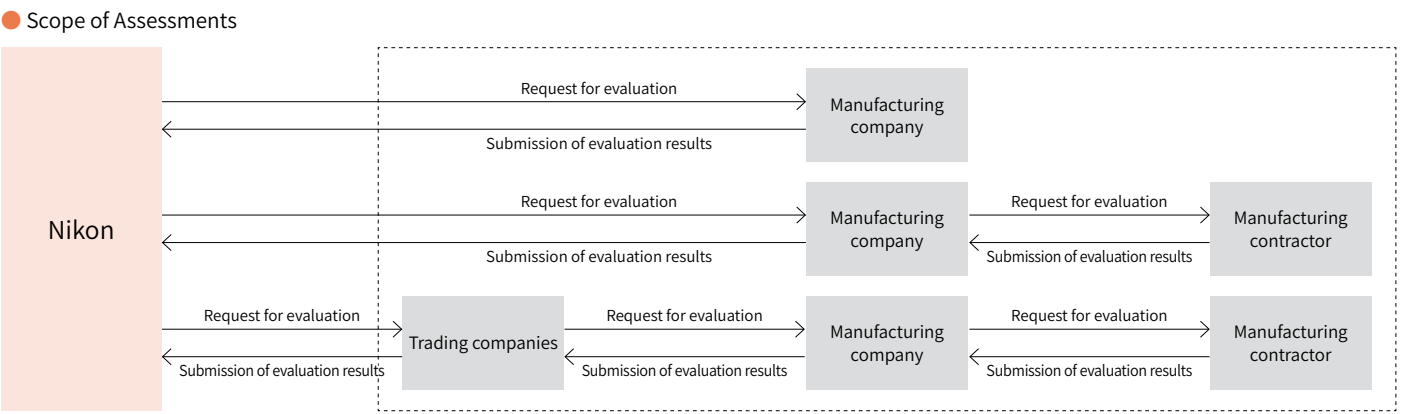
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Results of Fiscal Year 2025 Assessment

We requested new procurement partners, critical partners, and Tier 2 suppliers and above to comply with the Nikon CSR Procurement Standards, and we conducted the Nikon CSR Self-Assessment Survey for these entities. We also conducted CSR audits of our procurement partners.

New Procurement Partners

In fiscal year 2025, we conducted the Nikon CSR Self-Assessment Survey for 14 new procurement partners that will begin doing business with the Nikon Group. We confirmed said partners met target standards, and began business transactions with these new procurement partners.

Existing Procurement Partners (Tier 1 Suppliers)

In fiscal year 2025, we conducted the Nikon CSR Self-Assessment Survey for four critical procurement partners newly identified through M&A and other activities and confirmed that all four met the target standards. In addition, we conducted CSR audits (second-party audits) targeting five companies.

Tier 2 Suppliers and Beyond (Critical Procurement Partners)

In fiscal year 2025, we conducted the Nikon CSR Self-Assessment Survey for 1 Tier 2 suppliers and beyond, confirming that these entities met target standards.

Major CSR Audit Findings and Improvements

We place importance on dialogue with procurement partners when making improvements to issues identified in audits. With support from the Nikon secretariat, we confirm that partners complete improvements.

Findings	Improvements
Long working hours	Revised employment rules, strengthened management of working hours through system implementation, and assigned managers
Insufficient weekly days off	Revised employment rules and communicated the revised rules internally
Failure to document and internally communicate legal and regulatory updates	Documented legal and regulatory updates, strengthened the management framework, and communicated internally
Inadequate first aid kit placement and expired supplies	Installed new first aid kits, replaced expired medicines, and established regular inspection rules
Inadequate storage methods for some PPE (goggles, earplugs, etc.) in production plants	Improved PPE storage methods and established regular inspection rules

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● Assessment Results

				FY2021	FY2022	FY2023	FY2024	FY2025
Nikon CSR Self- Assessment Survey	Tier 1 suppliers	Existing procurement partners	Critical procurement partners (periodic assessments)	-	-	247	-	-
			Critical procurement partners newly identified through M&A and other means	-	-	-	15	4
		New procurement partners		15	6	20	3	14
	Suppliers other than Tier 1 suppliers (Tier 2 and beyond, including key partners)		43	11	30	7	1	
	Total		58	17	297	25	19◆	
Improvement requests based on the Nikon CSR Self-Assessment Survey results				13	-	20	1	-
Improvement requests based on CSR audits				-	2	3	3	4
Improvements completed*				26	-	3	23	3

*Improvements may be completed in the fiscal year following requests for improvement.
◆ Values in Data Index assured by a third party

Support for Responsible Minerals Sourcing

Basic Approach

Certain minerals contained in Nikon products may involve mining processes that pose risks of human rights violations, including child labor and forced labor, as well as environmental destruction, conflict, and social injustice. The Nikon Group established the Responsible Minerals Sourcing Policy, and we strive to procure mineral resources responsibly. The Nikon Group incorporates compliance with this policy into master agreements, and we ask all procurement partners and their suppliers to act responsibly in accordance with this policy.



► Responsible Minerals Sourcing Policy

Responding to High-Risk Minerals

Tin, tantalum, tungsten, gold, and cobalt are high-risk minerals distributed through our global supply chain from various countries and regions. In cooperation with procurement partners, Nikon continues our initiatives to improve supply chain transparency and reduce risk.

Survey Results on the Use of the Five Minerals (Tin, Tantalum, Tungsten, Gold, and Cobalt)

We conduct a Nikon Group survey on the use of the five minerals as follows.

- 1. Identify Nikon Group products manufactured or commissioned to be manufactured in each business unit for the year covered by the survey
- 2. Request procurement partners handling products subject to the survey to conduct their own survey regarding country of origin and smelters related to said minerals (using the industry

standard Responsible Minerals Initiative: RMI Conflict Minerals Reporting Template (CMRT/EMRT))

- 3. Compare smelter information collected from procurement partners against the RMI list of smelters

The results of the 2025 survey forming the basis of our 2026 Responsible Minerals Sourcing Report did not identify country of origin for all five minerals used in our products. However, we did not identify any minerals that could be considered as contributing to conflict in the reports submitted by procurement partners.

- **Tin, tantalum, tungsten, gold**
Conducted surveys using CMRT for 586 procurement partners. Of the 360 smelters identified in the survey, we found 226 to be compliant* with the Responsible Minerals Assurance Process (RMAP).
- **Cobalt**
Conducted surveys using EMRT for 66 procurement partners. Of the 104 smelters identified in the survey, we found 65 to be RMAP-compliant*.

*Compliance includes smelters for which assessments were in progress.

Risk Mitigation Initiatives

Nikon requires procurement partners to establish a conflict minerals policy and implementation plan. We also encourage procurement from smelters that comply with RMAP. We also encourage smelters that do not comply with RMAP (as identified in our surveys) to obtain certification.

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Responsible Minerals Sourcing

Nikon has participated in the Responsible Minerals Trade Working Group organized by the Japan Electronics and Information Technology Industries Association (JEITA) since 2013, working to raise awareness across the supply chain and improve the efficiency of due diligence efforts.

JEITA activities include hosting seminars and conducting survey briefings with domestic and international industry associations, as well as verifying smelter and refinery information. In fiscal year 2025, JEITA briefings attracted 3,049 participants from approximately 1,400 companies.

We also actively contribute to JEITA working groups, where we continue engaging with member companies to encourage more smelters to join the Responsible Minerals Assurance Process (RMAP).

Nikon has also been a member of the Responsible Minerals Initiative (RMI), a global program focused on resolving mineral-related risks, since 2014. Through our membership, we strengthen our approach to responsible minerals sourcing and contribute to international frameworks for addressing these issues.



- ▶ Report on the Responsible Minerals Sourcing Inquiry Briefings 2025
- ▶ Responsible Minerals Sourcing Report 2026 (2025 Survey Results)
- ▶ List of 3TG Smelters and Cobalt Refiners (Conformant and Active as of January 31, 2026) Identified by the 2025 Survey

Green Procurement

Basic Approach

Environmental regulations like the EU RoHS^{*1} Directive and REACH^{*2} Regulations have even become more widespread in countries outside the EU, and Japan has also established similar laws and regulations. Moreover, efforts aimed at reducing CO₂ are rapidly

growing around the world.

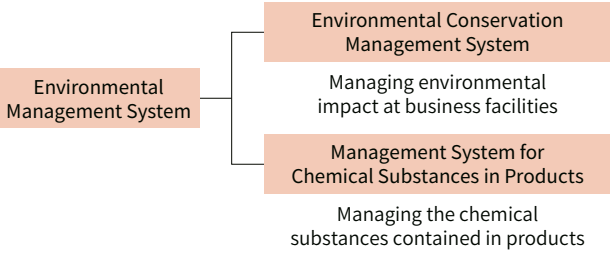
The Nikon Group has been aware of the social issues behind these social trends for some time. Based on the Nikon Green Procurement Policy, we conduct honest and fair materials procurement, aiming to continue providing products answering the expectations of our customers and to foster better society, a cleaner global environment, and sustainable corporate growth. Based on this philosophy, the Nikon Group created the Nikon Green Procurement Standards, prioritizing the procurement of goods that give consideration to environmental impact, and we have made active involvement in environmental conservation a condition of doing business with our procurement partners.

Specifically, we ask procurement partners to comply with the Nikon Green Procurement Standards and to establish and ensure proper operation of environmental management systems (including environmental management structure and the management system for hazardous chemical substances contained in products). Furthermore, we have defined prohibited chemical substances and controlled chemical substances for the chemical substances contained in products and used in manufacturing processes in the *Separate Volume: Corresponding Chemical Substance Lists*, a part of the aforementioned standards. We require our procurement partners to comply with these requirements and submit data via chemSHERPA^{*3} or other appropriate methods.

The Nikon Green Procurement Standards and the *Separate Volume: Corresponding Chemical Substance Lists* include not only the substances regulated by the EU RoHS Directive, REACH Regulations, and other laws and regulations in and outside Japan, but also our own regulated substances. We revise and update both materials regularly. We also provide procurement partners with explanations on revisions and updates to the list of controlled chemical substances, reflecting the latest laws and regulations, at the annual Sustainable Procurement Briefing.

^{*1} EU RoHS Directive: RoHS stands for “Restriction of Hazardous Substances.” This directive restricts use of specified hazardous substances in electrical and electronic equipment.
^{*2} REACH Regulations: An EU regulation on chemical substances that came into effect in 2007. REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals. Under this regulation, manufacturers, and importers of chemical substances are required to register information on the safety and use of these substances.
^{*3} chemSHERPA: A shared scheme for communicating information on chemical substances contained in products in the supply chain.

Environmental Management System



Environmental Management System Survey and Assessment

At the Nikon Group, we conduct environmental management system surveys every three years for each eligible procurement partner in accordance with risks of chemical substances occurring in materials used, components, and processes. In addition, we conduct environmental management system assessments to check the status of the establishment and management of environmental management systems.

Environmental management system assessments check the environmental management structure (EMS) and the management system for hazardous chemical substances contained in products (CMS) of procurement partners with a high risk of containing restricted substances. This review also covers the status of third-party management system certifications. For any noncompliance in environmental management systems found in the assessment process, improvements are requested, and assessments are completed after confirming that improvements have been made. We use the results of these assessments to certify procurement

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partners deemed compliant with our system standards as Nikon Environmental Partners. After certification, we continue to carry out checks on their system maintenance.

For smaller procurement partners that find it challenging to establish a system, we conduct a simplified environmental management system assessment to confirm how chemical information is communicated and managed. We are also working to expand the scope of these assessments to include trading companies. The simplified environmental management assessment confirms that there are no problems in the management of chemical substances contained in products. The assessment does not constitute certification as a Nikon Environmental Partner.

Nikon will conduct the next cycle (FY2026–FY2028) of environmental management system assessments by selecting applicable procurement partners based on the results of the environmental risk survey conducted in fiscal year 2025 using the latest transaction items.

In addition, we request that procurement partners submit data via chemSHERPA to check that their management of chemical substances contained in products is functioning effectively.

Education and Communication

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

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

In fiscal year 2025, 34 new assessors were certified, bringing the total number of assessors within the Nikon Group to 269^{*1}.

^{*1} As of March 31, 2026

Assessment Results

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

In fiscal year 2025, we conducted assessments for 9 procurement partners. As a result, 9 companies^{*2} were certified as new Environmental Partners.

In addition, we conducted renewal assessments for 167 procurement partners, bringing the total number of certified companies to 461^{*2}, including newly certified companies. For the 15 companies^{*2} not certified, we requested improvements.

^{*2} As of March 31, 2026

Environmental Partner Certification Results (as of March 31, 2026)

	FY2021	FY2022	FY2023	FY2024	FY2025
Assessments	149	180	167	168	167
Newly certified Environmental Partners	36	31	15	23	9
Total certified Environmental Partners	453	456	456	461	461

Note: Figures reflect the decrease stemming from discontinued business transactions, business closures, etc.