

Nikon Human Rights Policy

Established: April 1, 2019, Revised: April 1, 2025

Nikon (Nikon Corporation and all of its subsidiaries worldwide) has a corporate philosophy of “Trustworthiness and Creativity,” and our goal is to continue creating and providing new value to society while earning its trust.

Respect for the human rights of all individuals connected to our business (stakeholders) forms the foundation for realizing our corporate philosophy. Based on this belief, the Nikon Human Rights Policy (this policy) defines our approach in addressing human rights in our business.

1. Scope of this policy

This policy applies to all of Nikon’s directors, officers and employees (of any category). We also encourage our procurement partners, other business partners, and customers to understand and uphold the principles of this policy.

For our procurement partners in particular, we have established the Nikon CSR Procurement Standards, which request that they engage in responsible business conduct and cooperate in addressing human rights issues in the supply chain.

2. Commitment to respecting human rights

We recognize that we can impact the human rights of all stakeholders through our business activities, and are committed to neither causing nor contributing to human rights violations.

We comply with the laws and regulations in each country and region where we operate. If local laws and regulations conflict with international human rights standards, we are committed to respecting the internationally recognized human rights to the greatest extent possible while still complying with those local laws and regulations.

We respect the human rights recognized in international instruments such as the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, and conduct measures based on the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. We also endorse and reference the Ten Principles of the UN Global Compact, and the Responsible Business Alliance Code of Conduct and standards.

3. Governance

Formulation and revision of this policy, the initiatives based on it, and their

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progress are deliberated by the Sustainability Committee, chaired by the president and reported to the Board of Directors following resolutions and reports at the Executive Committee in Nikon Corporation. For salient human rights issues relevant to our business, the committee also defines the management system and takes action to reflect this policy in our business activities. These initiatives are monitored by the Board of Directors.

4. Conducting human rights due diligence

Based on the UN Guiding Principles on Business and Human Rights, we are committed to continuously assessing human rights risks in our business activities and taking action to prevent or mitigate any identified adverse impacts. The progress and results of these efforts are tracked and checked in order to build systems and frameworks for effective initiatives. We regularly disclose information about these initiatives and their results.

5. Salient human rights issues relevant to our business

With the support of external experts, we conducted a value chain impact assessment for human rights issues. Based on the results, we have identified the following six human rights issues as highly relevant to our business activities. We will work systematically to address these issues.

① Health and safety

We are committed to providing safe and healthy working conditions for everyone in our organization. We comply with the laws and regulations regarding occupational safety in all the countries and regions where we operate in order to prevent work-related accidents.

② Working environments

We comply with all applicable national and regional laws and regulations regarding working hours, leave and days off, and minimum wage. We also prohibit any form of harassment and discrimination, which can undermine individual dignity and disrupt the workplace and job performance.

We will deepen the understanding of Diversity, Equity & Inclusion (“DEI”) as a fundamental ethos, and will foster working environments where the characteristics and abilities of all team members are accepted and valued.

③ Workers’ human rights in the supply chain

We respect the human rights of workers in the supply chain and are committed to initiatives that protect their rights. We are also committed to responsible mineral procurement, and seek to prevent or mitigate adverse human rights impacts and environmental degradation related to mineral sourcing.

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④ **Zero tolerance for child labor and forced labor**

We have zero tolerance for child labor and any form of forced labor (including labor procured through human trafficking) within our own company or in the supply chain.

⑤ **Ethical use of AI**

We recognize potential human rights issues caused by the use of AI, and will establish a policy on AI and human rights to address this. We will strive to ensure that the policy is widely known and understood, and that our initiatives are aligned with it. Through responsible use of AI technologies, we aim to help achieve a sustainable society.

⑥ **Access to remedy**

In order to ensure access to remedy for all of our stakeholders, we will design and implement a grievance mechanism that is open to everyone, and respond to grievances seriously. We will appropriately handle confidential information about reports and the individuals who make them, and prohibit disadvantageous treatment and retaliation.

6. Remediation

If it becomes clear that our business activities have caused or contributed to

adverse human rights impacts, we will take appropriate measures to remedy the issue and prevent recurrence. In addition, if it becomes clear that any adverse human rights impacts of our suppliers or business partners are connected to their business activities with us, we will strive to work with the relevant parties to remedy and prevent recurrence of those adverse impacts.

7. Stakeholder engagement

We are committed to continually engaging with stakeholders whose human rights are or could be adversely impacted by our business activities, and will reflect this dialogue in our initiatives.

8. Education and trainings

We will conduct education and trainings for directors, officers and employees (of any category) so that they understand this policy and reflect it in their actions as they conduct their daily duties.

9. Enactment and amendment

The enactment and revision of this policy is resolved by the Nikon Corporation Board of Directors. This policy will continue to be regularly reviewed.

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* Both Japanese and English texts shall have equal standing and they are but two expressions of the same intent and together constitute one policy embodying a single meaning. In the event of ambiguities and inconsistencies between the Japanese and/or English text(s) and the third language, then the Japanese and English texts as the context so requires shall prevail.