



# CODE OF CONDUCT

**Nikon Code of Conduct**

---



# MESSAGE FROM THE PRESIDENT

---

## To everyone in the Nikon Group

---

For us in the Nikon Group, when carrying out our business activities, things do not always go smoothly. Global society is continuing to undergo a dramatic process of transformation, and we also have to deal with sudden events that could not have been predicted in advance, such as pandemics.

In facing up to these situations, even when we are forced to make difficult choices, the thing that we must prioritize above all else is to act with integrity and fairness, in line with Nikon's corporate philosophy of Trustworthiness and Creativity. How each individual within the Nikon Group acts constitutes the foundation that underpins all of our business operations.

In the past, by continuing to challenge ourselves to realize innovation, we have generated countless products and services that have provided new value for the world. The positive response that these products and services have had from society has been the well-spring of the Nikon Group's continued growth and has supported our corporate activities over a period of more than a century.

Of course, as a business enterprise, we cannot ignore the need to achieve profitability. However, even if we meet our sales targets, if just a single individual has committed a compliance violation, then people may lose faith in the Nikon Group as a whole, and the Group may suffer damage that we cannot recover from.

It is vitally important for everyone in the Nikon Group to act with integrity and fairness, and to fulfill compliance requirements, so that we can live up to the expectations that stakeholders such as customers, business partners, shareholders, investors and local communities, etc. have of us, and continue to win their trust and understanding.

The Nikon Code of Conduct sets the core standards of behavior and conduct for everyone in the Nikon Group, based on Nikon's corporate philosophy of Trustworthiness and Creativity. If you suspect that either you yourself, or someone else, may have failed to live up to the Nikon Code of Conduct, then please be sure to follow up on this. If you are not sure what to do, check with your supervisor or your colleagues.

Everyone in the Nikon Group is expected to act in accordance with the Nikon Code of Conduct. Let us all strive to make sure that Nikon remains an enterprise that is trusted by society for the next 100 years, so that the Nikon Group can continue on to the next generation.

October 1, 2021



Toshikazu Umatate  
Representative Director  
President  
Chairperson of the CSR Committee

# HOW TO READ PAGES

Chapter title

Code of Conduct

Explanation of terms

Q&As:  
Frequently asked questions

## 5. OPERATION PRACTICES

### (1) ANTI-BRIBERY AND CORRUPTION

- [1] Nikon has a zero tolerance approach against bribery and will make every effort to prevent bribery.
- [2] We will avoid behavior that may raise suspicions of bribery.
- [3] We will commit to being a responsible corporate citizen wherever Nikon operates or conducts business by maintaining sound and sincere relationships with public authorities and public officials, complying with applicable laws and regulations, and by avoiding corruption.

#### Our principles

Bribery is unacceptable. It prohibits open competition and inhibits the sound socioeconomic development of countries and regions. Many countries around the world have laws and regulations in place that prohibit bribery of public officials and those equivalent to public officials (collectively "Public Officials") as well as of individuals or organizations in the private sector. Nikon prohibits bribery in every country and region where it operates and promotes activities to prevent bribery before it occurs. Additionally, if third parties working for, or on behalf of, Nikon (distributors, agents, consultants, etc.) engage in bribery, Nikon could also be held legally liable. Therefore, third parties must be managed accordingly.

#### What this means for us

We will:

- Never offer, directly or indirectly, any form of gift, benefit or anything of value to anyone for the purpose of:
  - Obtaining or retaining business,
  - Influencing business decisions, or
  - Securing an unfair advantage.
- Never offer bribes<sup>1)</sup> directly, or through third parties.
- Investigate all third parties thoroughly before engaging their services and manage them in accordance with company rules on bribery prevention.



#### Explanation of terms

(1) **Offering bribes** is the giving of, or promise to give, money, benefit or other advantage, either directly or indirectly, in exchange for an improper advantage for Nikon or Nikon employees.



#### Group policies related to this chapter:

Nikon Anti-Bribery Policy

#### Q&A

**Q1** To whom does the term "Public Officials" refer?

**A1** The term "Public Officials" refers to (but is not limited to):

- Officers, members or employees of public bodies such as governments, agencies or ministries, local governments, etc.;
- Employees of state and national enterprises and companies, and persons who are treated as public servants in accordance with laws and regulations;
- Officers and employees of a political party and candidates for public office;
- Employees of international institutions, etc.; and
- Persons who engage in public duties on behalf of those indicated above.

**Q2** An employee at company A (our customer) is looking for a job for his daughter and asked me if Nikon would hire her. He says that the matter we are currently negotiating with company A would be approved if his daughter is hired by Nikon. Would his request be considered bribery?

**A2** Yes, promising to approve a business deal under the condition of employment is considered bribe. A bribe is anything of value, and therefore is not limited to offers of cash. You should explain that his daughter may apply for a job, but that any decision to hire her will be in accordance with Nikon's standard selection criteria and hiring practices.

Our principles:  
Explanation of our principles

What this means for us:  
Explanation of how this applies to our conduct

Group policies and applicable rules related to this chapter

# TABLE OF CONTENTS

---

Message from the President	1
How to read pages	2
Our Philosophy, Our Vision, Our Qualities of Mind, Code of Conduct	4
Nikon Code of Conduct Decision Tree	5

## Code of Conduct

Introduction/Scope	6
<b>1</b> Responsibility	<b>7</b>
<b>2</b> Respect for Human Rights	<b>8</b>
<b>3</b> Sound Working Environment	<b>9</b>
<b>4</b> Protection of the Natural Environment	<b>10</b>
<b>5</b> Operation Practices	<b>11</b>
<b>(1)</b> Anti-Bribery and Corruption	<b>11</b>
<b>(2)</b> Relationship with Suppliers and Business Partners	<b>12</b>
<b>(3)</b> Social Responsibility in the Supply Chain	<b>13</b>
<b>(4)</b> Entertainment and Gifts	<b>14</b>
<b>(5)</b> Lobbying and Political Donations	<b>15</b>
<b>(6)</b> Fair Competition and Business Transactions	<b>16</b>
<b>(7)</b> Import and Export Control	<b>17</b>
<b>(8)</b> Taxation	<b>18</b>
<b>(9)</b> Insider Trading Prevention	<b>19</b>
<b>(10)</b> Proper Use and Management of Nikon Property	<b>20</b>
<b>(11)</b> Protection of Intellectual Property Rights	<b>21</b>
<b>(12)</b> Sound Communication	<b>22</b>
<b>(13)</b> Appropriate Information Management	<b>23</b>
<b>6</b> Factual Information and Disclosure	<b>24</b>
<b>7</b> Provision of Valuable Products and Services	<b>25</b>
<b>8</b> Community Relations	<b>26</b>
Reporting/Consulting System, Consequences of Violation	<b>27</b>
Code of Conduct Administration / (Footnote) / Disclaimer	<b>28</b>

## Our Philosophy

---

# Trustworthiness and Creativity

Our corporate philosophy is "Trustworthiness and Creativity."

These are simple words, but they are not easily put into practice.

These important words represent unchanging principles to which we will always be dedicated.

## Our Vision

---

# Unlock the future with the power of light

Unleashing the limitless possibilities of light.

Striving to brighten the human experience.

Focused, with purpose, on a better future for all.

THIS IS THE ESSENCE OF NIKON.

## Our Qualities of Mind

---

### Curiosity

We show our passion for progress through a wide range of interests to cultivate fresh ideas.

### Acceptance

We warmly embrace diverse ideas and delight in differences among people and cultures.

### Inspirational Power

We share our ideas with infectious enthusiasm to effect positive change in the world.

## Code of Conduct

---

# Nikon Code of Conduct

The Nikon Code of Conduct defines the standards upon which all Nikon employees shall base their conduct on a daily basis. Employees shall be conscious of their compliance with these standards, which shall guide every employee in making appropriate, honest, and highly ethical decisions.

# NIKON CODE OF CONDUCT DECISION TREE

Before making a business decision for Nikon, ask yourself the following questions:



When in doubt, consult your superior or relevant department.  
Do not take any action before obtaining further advice or support.

Will the action comply with relevant laws and company rules?

YES

Will the action preserve Nikon's integrity and trustworthiness?

YES

Might the action earn the confidence of stakeholders?

YES

Would I feel confident in my decision (not embarrassed) if it were reported in media?

YES

**YES**  
OK to proceed forward

NO

NO

NO

NO

**NO** Don't do it!

## INTRODUCTION

---

The Nikon Code of Conduct (the “Code of Conduct”) sets the core standards of behavior and conduct for all directors, officers and employees of Nikon Corporation and its subsidiaries worldwide (“Personnel”).

In order to embody Nikon’s corporate philosophy of “Trustworthiness and Creativity”, the implementation of the Code of Conduct by all Personnel will help to promote Nikon’s corporate social responsibilities and Nikon’s contributions to the sustainable development of society.

All Personnel must strive to conduct themselves in a sincere manner with utmost integrity and professionalism. The Code of Conduct should be recognized as a guide in that it may not address every situation.

The Code of Conduct is intended to help Personnel make the right decisions in their work activities.

## SCOPE

---

The Code of Conduct applies to all Personnel of Nikon. “Nikon” as mentioned in the Code of Conduct refers to Nikon Corporation and all of its subsidiaries worldwide, and “we”, “us” or “our” refers to all Personnel of Nikon.



# 1. RESPONSIBILITY

- [1] We are responsible for adhering to the Code of Conduct and any policies regarding behavior and conduct that have been established by the Nikon company by which we are employed, and complying with applicable laws while conducting business for or acting on behalf of Nikon. We must conduct Nikon's business activities and operations ethically and in the best interest of Nikon.
- [2] Each director, officer, manager and supervisor of Nikon maintains a responsibility to engage in their work objectively and fairly, and to actively promote communication at all levels within Nikon, and has the responsibility of being a positive role model who is expected to lead by example and to encourage others within Nikon to embrace the principles of the Code of Conduct. Each director, officer, manager and supervisor of Nikon also has a responsibility to help employees understand the Code of Conduct.



## Our principles

Each and every employee plays an important role in supporting the Nikon brand. For Nikon to continually grow by building unwavering trust and credibility and by providing new value as a global company, we must not only follow all applicable laws and regulations and company rules, but also ensure our actions are in line with the Code of Conduct.



## What this means for us

We will:

- Thoroughly read and comprehend the Code of Conduct.
- Participate in training on the Code of Conduct organized by Nikon.
- Follow the Code of Conduct as we engage in daily work duties.
- Ask a superior whenever a question arises.
- Immediately report any violation or suspected violation.

Every organization head will:

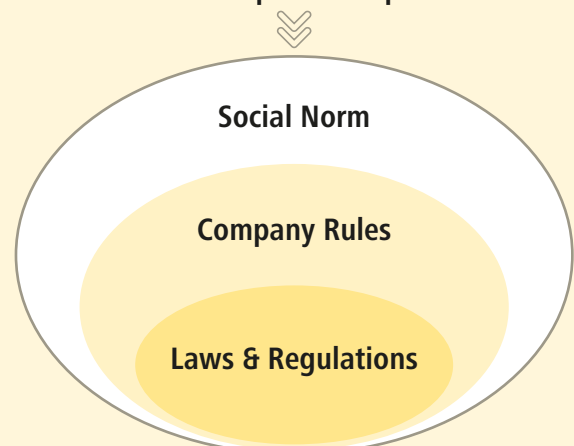
- Consistently demonstrate commitment to achieving results using correct, appropriate, ethical and lawful methods.
- Respond sincerely to questions from subordinates.
- Strive to create a workplace where employees can openly discuss matters and share their opinions.
- Whenever a problem occurs in the workplace, address the problem immediately after checking the facts, and when necessary, consult with the responsible department(s).

## Q&A

**Q** Is it enough that I comply with the applicable laws and regulations in my daily work?

**A** No, complying with the applicable laws and regulations is not enough. It is important that we not only comply with laws and regulations, but also the rules from time to time adopted by Nikon and the local Nikon company by which we are employed and the social norms.

## Nikon's Scope of Compliance



## 2. RESPECT FOR HUMAN RIGHTS

- [1] Nikon has signed the **UN Global Compact**<sup>(1)</sup>, and we respect Nikon's participation in it. We also recognize international standards of conduct regarding human rights. We will strive to ensure that we do not engage in any conduct that obstructs or violates human rights.
- [2] We will respect every person's character and individuality, and we will not engage in any act that impairs individual dignity.
- [3] We will also not engage in any **forced labor**<sup>(2)</sup> or **child labor**<sup>(3)</sup>, and expect Nikon's suppliers and business partners to do the same.



### Our principles

- Nikon will strive not to violate human rights and not to be complicit with others involved in any such behavior.
- Nikon will tackle human rights issues sincerely as a responsible global company.
- Forced labor and child labor are serious human rights issues. Nikon will put in place sufficient measures to prevent these forms of labor at Nikon and in its supply chain.



### What this means for us

We will:

- Respect the rights of all people during the course of business activities.
- Always be mindful of whether our own words and actions violate another person's human rights.
- Respect one another's character and individuality in all interpersonal communications, and engage one another with a fair attitude.
- Not discriminate or make decisions based on the attributes of an individual that are not related to their skills, performance or qualifications.



**Group policies related to this chapter:**  
Nikon Human Rights Policy



### Explanation of terms

**(1)** The **UN Global Compact** is a voluntary international framework established in 2000 stating ten principles in the areas of human rights, labor, environment, and anti-corruption. Companies that support these guidelines declare their commitment through their CEOs and then take action to implement these principles. Nikon became a signatory to the UN Global Compact in 2007.

- (2)** **Forced labor** is any work or service that is exacted from individuals under the menace of any penalty, and for which those persons have not offered themselves voluntarily. This means that even the labor of workers who are provided wages or compensation may still be considered forced labor. Any situation where workers are unable to quit because their passport or personal identification document is confiscated or because they are levied an unreasonably large debt by their employer is considered forced labor, even if they are paid wages.
- (3)** **Child labor** generally refers to labor involving children under the age of 15.

### Q&A

**Q1** In what ways does Nikon show its respect for human rights?

**A1** In the course of everyday business of Nikon, the following can be regarded as respect for human rights, for instance:

- Prohibiting direct and indirect forced and child labor, and not being complicit with others in any such conducts.
- Providing its employees with a safe workplace environment.
- Ensuring there is no discrimination and harassment.
- Safeguarding customers' information and employees' personal data.
- Conducting business operations not to generate negative impact to the environment of the local communities.

**Q2** Why does Nikon have to be mindful of forced labor or child labor at other companies in the supply chain?

**A2** If we do business with a company that uses forced labor or child labor, Nikon will be viewed by society as being accepting of such situations and complicit in human rights violations.

### 3. SOUND WORKING ENVIRONMENT

- [1] Nikon will respect the basic rights of all Personnel regarding freedom of association in accordance with the applicable laws and regulations of the countries in which Nikon operates.
- [2] We support a diverse and inclusive working environment. We will strive to mutually accept different opinions and values, provided they do not unlawfully infringe on the rights of others, and will work together to create a working environment where we can all perform at our best and where **harassment<sup>(1)</sup>** in any form is never tolerated.
- [3] We will comply with the applicable laws and regulations related to the working conditions of Personnel whenever they are conducting business for Nikon, as well as promote health and safety to ensure a healthy and safe work environment for all Personnel.
- [4] Nikon will strive to offer Personnel a healthy balance between work and their personal life.
- [5] Nikon will provide equal employment opportunity in that we will not discriminate on the basis of race, color, ethnicity, sex, nationality, age, religion, disability, or other protected characteristics as defined by applicable laws.



#### Explanation of terms

(1) **Harassment** generally means a range of unacceptable behaviors and practices, or threats that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, including gender-based harassment and workplace bullying, etc.



#### Our principles

- Nikon respects the diversity of its people and strives to create a workplace environment where all employees can fully contribute their skills and play an active role. Nikon's competitiveness can be enhanced by providing an open workplace environment where employees respect one another and can freely share their values and views.
- Nikon believes that a workplace environment where employees can work safely and maintain their physical and mental health will enrich their personal life and improve workplace vitality and productivity. As a result, Nikon carefully manages safety and also helps employees to maintain and improve their own health.
- Nikon attaches great importance to the physical and mental well-being and safety of employees during major disasters, pandemics or other emergencies, and will endeavor to implement the necessary countermeasures.
- Nikon never tolerates acts that violate the dignity of others or interfere with workplace order or business operations.



#### What this means for us

We will:

- Embrace different values wholeheartedly and respect diversity.
- Strive to understand differing views and cultural differences.
- Cooperate to achieve health and safety in the workplace, recognizing its importance.
- Never engage in high pressure or offensive acts, act in bad faith, take part in harassment, or use discriminatory or inappropriate remarks.
- Never use sexual innuendo or make remarks based on gender stereotypes.

#### Q&A

**Q1** What specific actions does Nikon expect employees to take to show a respect for diversity?

**A1** Employees are expected to behave in the following manner:

- Positively incorporate other people's perspectives and experiences that you can learn from.
- Be curious, seek out diverse views and ideas, and actively work to expand your own horizons.
- Strive to contribute to team activities using various constructive views and perspectives.
- Strive to understand and appreciate differing views and cultural differences.

**Q2** I hurt my back when carrying a large object at work. My department has set a goal to eliminate all workplace accidents and injuries. If I report my injury, the department will not achieve its goal. Should I report it?

**A2** Yes, you must immediately report any accident that occurred in the course of your duties to a superior or the department in charge of occupational health and safety. This is because Nikon uses these reports to take the necessary remedial action, such as making changes to work processes and/or carrying out safety training. Always report a workplace accident or injury. Failure to do so simply because the department's goal will not be met will be deemed concealment of an accident.

## 4. PROTECTION OF THE NATURAL ENVIRONMENT

- [1] Nikon will raise environmental awareness of Personnel in order to contribute to a sustainable society. We will conduct business operations with respect for the environment.
- [2] We will strive to reduce environmental impacts in all stages of our business operations, from procurement of raw materials to development, manufacturing, logistics, sales, use, services, and final disposal, and provide environmentally friendly products and services.
- [3] We will comply with applicable environmental laws and regulations, and will actively strive for appropriate use and management of chemical substances and waste reduction. We will also make assertive efforts to reduce CO2 emissions, such as implementing energy efficient facilities and energy conservation.
- [4] We will strive for resource conservation, efficient use, reuse and recycling so as to realize sustainable use of limited resources.



### Our principles

Climate change and resource depletion are becoming serious global issues. During the course of its business activities, Nikon consumes energy and resources, while also impacting the environment in various ways, including the release of gasses, water and waste. Recognizing this, Nikon will work to reduce greenhouse gasses, provide eco-friendly products, and conduct eco-friendly business activities, such as sustainable procurement and use of resources, in order to help mitigate the impact we and society have on the environment. Nikon will also create new businesses and innovations that reduce environmental impacts.



### What this means for us

We will:

- Examine our daily business activities from an environmental perspective and strive to always engage in eco-friendly actions.



### **Group policies related to this chapter:**

Nikon Long-term Environmental Vision  
Nikon Paper Procurement Policy  
Nikon Basic Green Procurement Policy  
Nikon Environmental Activity Policy  
Hazardous Chemical Substances Guideline

### Q&A

**Q1** How is my daily work related to the environment?

**A1** Laws and regulations related to the environment must be complied with during the course of our daily operations. Among them, laws on hazardous chemical substances vary by country and sometimes are revised suddenly, requiring Nikon to constantly keep abreast of the situation. The improvements you make in your own work could help to reduce our impact on the environment. For example, streamlining work, reducing production lead time, making products more compact and lightweight, reducing the defect rate, and green procurement all help to reduce energy and resource usage, waste and hazardous chemical substances.

**Q2** What are some specific examples of Nikon's impact on the environment?

**A2** Nikon's impact on the environment may take many forms, including:

- Use of electricity, gas, water and copy paper at offices.
- Use and disposal of materials and raw materials.
- Use of fuel during transport.
- Means of transportation to work or for business travel.
- Energy consumption and disposal of products sold.

## 5. OPERATION PRACTICES

### (1) ANTI-BRIBERY AND CORRUPTION

- [1] Nikon has a zero tolerance approach against bribery and will make every effort to prevent bribery.
- [2] We will avoid behavior that may raise suspicions of bribery.
- [3] We will commit to being a responsible corporate citizen wherever Nikon operates or conducts business by maintaining sound and sincere relationships with public authorities and public officials, complying with applicable laws and regulations, and by avoiding corruption.



#### Our principles

Bribery is unacceptable. It prohibits open competition and inhibits the sound socioeconomic development of countries and regions. Many countries around the world have laws and regulations in place that prohibit bribery of public officials and those equivalent to public officials (collectively "Public Officials") as well as of individuals or organizations in the private sector. Nikon prohibits bribery in every country and region where it operates and promotes activities to prevent bribery before it occurs. Additionally, if third parties working for, or on behalf of, Nikon (distributors, agents, consultants, etc.) engage in bribery, Nikon could also be held legally liable. Therefore, third parties must be managed accordingly.



#### What this means for us

We will:

- Never offer, directly or indirectly, any form of gift, benefit or anything of value to anyone for the purpose of:
  - Obtaining or retaining business,
  - Influencing business decisions, or
  - Securing an unfair advantage.
- Never **offer bribes**<sup>(1)</sup> directly, or through third parties.
- Investigate all third parties thoroughly before engaging their services and manage them in accordance with company rules on bribery prevention.



#### Explanation of terms

- (1) **Offering bribes** is the giving of, or promise to give, money, benefit or other advantage, either directly or indirectly, in exchange for an improper advantage for Nikon or Nikon employees.



#### Group policies related to this chapter:

Nikon Anti-Bribery Policy

#### Q&A

**Q1** To whom does the term "Public Officials" refer?

**A1** The term "Public Officials" refers to (but is not limited to):

- Officers, members or employees of public bodies such as governments, agencies or ministries, local governments, etc.;
- Employees of state and national enterprises and companies, and persons who are treated as public servants in accordance with laws and regulations;
- Officers and employees of a political party and candidates for public office;
- Employees of international institutions, etc.; and
- Persons who engage in public duties on behalf of those indicated above.

**Q2** An employee at company A (our customer) is looking for a job for his daughter and asked me if Nikon would hire her. He says that the matter we are currently negotiating with company A would be approved if his daughter is hired by Nikon. Would his request be considered bribery?

**A2** Yes, promising to approve a business deal under the condition of employment is considered bribe. A bribe is anything of value, and therefore is not limited to offers of cash. You should explain that his daughter may apply for a job, but that any decision to hire her will be in accordance with Nikon's standard selection criteria and hiring practices.

# 5. OPERATION PRACTICES

## (2) RELATIONSHIP WITH SUPPLIERS AND BUSINESS PARTNERS

- [1] We will select suppliers and business partners appropriately and fairly based on merit, reputation and quality of service. We will base Nikon's relationships with suppliers and business partners on lawful, efficient and fair practices.
- [2] We will not exploit Nikon's position in business relationships by forcing onto suppliers and business partners unethical conditions or disadvantages by engaging in fraudulent activities, or by seeking personal gain.
- [3] Nikon expects all of its suppliers and business partners to adhere to the terms and conditions of its contractual agreements and to be in compliance with all applicable laws and regulations of the countries in which they operate.



### Our principles

Nikon works with its procurement and business partners to elevate the value of the products and services it supplies to customers. This relationship must never represent a **conflict of interest**<sup>(1)</sup>. Procurement and business partners include all companies involved in Nikon's value chain. Furthermore, Nikon must also consider the ethical behavior of the upstream companies in its supply chain in the countries where they operate.



### What this means for us

We will:

- Select suppliers based on a fair comparison/evaluation using objective criteria with regard to various conditions including price, technology, quality, delivery time, stability of supply, and services.
- Understand a more advantageous position of purchasing/outsourcing parties than that of selling/undertaking parties in general, and not demand entertainment and/or gifts, nor make requests for personal gain, using such an advantageous position.
- Carefully scrutinize the fairness and transparency of our dealings with suppliers.



### Explanation of terms

(1) **Conflict of interest** refers to a situation where one stakeholder's advantage results in the other stakeholder's disadvantage. (See "5. Operation Practices, (6) Fair Competition and Business Transactions" in the Code of Conduct).



### Group policies related to this chapter:

Nikon Basic Procurement Policy  
Nikon CSR Procurement Standards  
Nikon Basic Green Procurement Policy  
Nikon Green Procurement Standards  
Nikon Environmental Activity Policy  
Hazardous Chemical Substances Guideline

## Q&A

**Q1** A company that I am closely acquainted with is facing a difficult time financially. Given our long-standing business relationship, may I lobby relevant departments in-house to have this company selected as a procurement partner for the next-generation model?

**A1** No, you may not. Their selection based solely on the fact that you have a close relationship with them would not make for a fair transaction. While track record is one means of assessing a potential supplier, suppliers must be selected fairly and impartially in accordance with the Nikon Basic Procurement Policy.

**Q2** I found that a transaction in violation of Nikon's procurement regulations is actually legal in the country where the supplier is located. May I go ahead with the transaction?

**A2** No, you may not. Some countries do not have fully developed laws and regulations in place. While it is important to comply with local laws, you should require that suppliers be in compliance with international norms and regulations.

## 5. OPERATION PRACTICES

### (3) SOCIAL RESPONSIBILITY IN THE SUPPLY CHAIN

As part of Nikon's effort to promote socially responsible behavior within Nikon's supply chains, we expect all Nikon suppliers and business partners to hold themselves to the same standards of behavior and conduct as Nikon holds for itself as set forth in the Code of Conduct.

We also expect our suppliers and business partners to uphold the core standards set out in this Code of Conduct including policies of Nikon concerning compliance with all applicable laws, respect for human rights, working environment, protection of natural environment and the safety and security of products and services.



#### Our principles

Nikon must fulfill its responsibilities to society in all aspects of the products and services it offers. This is because companies play a larger role in resolving social issues due to economic globalization and the fact that some issues cannot be resolved by government alone. Nikon will fulfill its responsibilities to society by expanding this scope to include its procurement and business partners as well.



#### What this means for us

We will:

- Take action to understand our social responsibilities and roles in the supply chain with regard to Nikon's products and services.
- Responsibly manage the supply chain based on a complete understanding of Nikon's approach in departments involved in purchasing/procurement.
- Understand Nikon's approach and respond accordingly to inquiries we may receive from outside Nikon, including those from customers, in departments not involved in purchasing/procurement.



#### **Group policies related to this chapter:**

Nikon Basic Procurement Policy  
Nikon CSR Procurement Standards  
Nikon Basic Green Procurement Policy  
Nikon Green Procurement Standards  
Responsible Minerals Sourcing Policy  
Nikon Environmental Activity Policy  
Hazardous Chemical Substances Guideline

#### Q&A

**Q** I received a letter from a supplier's labor union explaining that an employee of one of Nikon's Tier 2 suppliers was fired unfairly. The letter has not been addressed for about one month because it concerns Tier 2 supplier with whom Nikon does not deal directly. Is this a problem?

**A** Letters like this should not be ignored. One aspect of Nikon's CSR activities is responding to inquiries from outside Nikon in a faithful and sincere manner. Failing to address such a letter could have a negative effect on the Nikon brand. You must consider a problem in Nikon's supply chain as Nikon's problem, even when it concerns an indirect relationship with Nikon. Always contact relevant departments promptly and deal with the situation in a responsible manner.

## 5. OPERATION PRACTICES

### (4) ENTERTAINMENT AND GIFTS

- [1] Whenever we conduct business for Nikon, we will comply with applicable laws and regulations as well as Nikon's policies regarding the giving and/or receiving of **entertainment**<sup>(1)</sup> and/or gifts to and/or from customers, suppliers, business partners and others doing or seeking to do business with Nikon. We will only participate in business entertainment and the giving and receiving of gifts to the extent necessary and reasonable under business norms, and will consult our supervisor if in any doubt about whether such behavior is appropriate.
- [2] We will not provide entertainment and/or gifts to a customer or others doing or seeking to do business with Nikon in exchange for assistance or influence, or upon the understanding that such assistance or influence has been or will be rendered in connection with any business transaction affecting Nikon. We will not accept entertainment and/or gifts from suppliers, business partners or others doing or seeking to do business with Nikon under circumstances which may be interpreted as potentially influencing a decision regarding a business transaction involving Nikon.
- [3] As to entertainment and/or gifts provided or received, we will report and follow any standards of conduct set forth in policies specific to the Nikon company by which we are employed.



#### Our principles

Entertainment and/or gifts may be offered on occasion to maintain and promote amicable ties or as part of information gathering activities. However, excessive entertainment and/or personal gifts could be seen as a request for improper influence, which could negatively affect Nikon's credibility with society. Nikon prohibits the offering or receiving of entertainment and/or gifts to gain an unfair advantage or request in return.



#### What this means for us

We will:

- Not provide or receive entertainment and/or gifts which may be seen as intended to influence a business decision involving Nikon.
- Check company bribery prevention rules or guidelines regarding limits on monetary value and the frequency and timing with which entertainment and/or gifts are given before giving or receiving entertainment and/or gifts.
- Request approval for the giving or receiving of entertainment and/or gifts from a superior beforehand, or report the same ex post facto, in accordance with company bribery prevention rules or guidelines, and the superiors approve or deny requests in accordance with company rules and standards.
- Accurately account for all entertainment and/or gifts given or received.



#### Explanation of terms

- (1) **Entertainment** means acts that provide a friendly reception to another party, such as meals, parties, sporting events, concerts and rounds of golf.



#### Group policies related to this chapter:

Nikon Anti-Bribery Policy

#### Q&A

**Q1** Sometimes I go out to eat or pay for drinks during or after meetings with customers. The amounts are small, but it happens quite frequently. Of what sorts of things should I be mindful in cases like this?

**A1** Offering refreshments is a courtesy acknowledged as a normal business practice. However, it is important to be mindful that such actions are not intended to seek or respond to some form of advantage and/or to influence a business decision. You should also be sure to follow company rules regarding the giving and receiving of entertainment and/or gifts.

**Q2** I'm considering a new procurement partner. I was invited to dinner by the contact person of one candidate company. Can I accept this invitation?

**A2** No, this is not generally allowed. Being entertained by a company for a position or contract with Nikon at this stage could call into question the fairness of the selection process, even if no unfair advantage or consideration is actually given. Nikon prohibits the giving or receiving of entertainment and/or gifts in exchange for improper influence.



## 5. OPERATION PRACTICES

---

### (5) LOBBYING AND POLITICAL DONATIONS

Nikon will comply with all applicable laws relating to **lobbying**<sup>(1)</sup> and political donations in the countries in which Nikon operates.



#### Our principles

Most countries have their own strict laws and regulations regarding lobbying and political donations. Nikon will confirm and comply with these laws and regulations.



#### What this means for us

We will:

- Have our local legal department confirm applicable laws and regulations before we lobby or make political donations in any country.



---

#### Explanation of terms

(1) **Lobbying** refers to private activities carried out by an individual or organization for the purpose of political influence.

## 5. OPERATION PRACTICES

### (6) FAIR COMPETITION AND BUSINESS TRANSACTIONS

- [1] Based on the principle of fair and open competition, we will compete vigorously in the marketplace, and do so by fully complying with the antitrust and other competition laws wherever we do business for Nikon.
- [2] We will not enter into any agreement whether formal or informal, written or verbal, with a competitor that sets prices of products or services, allocates markets or customers, eliminates competition, or otherwise unreasonably restrains trade.
- [3] We will honor Nikon's contracts with its customers, suppliers and business partners by adhering to the terms of these contracts.
- [4] We will avoid any practice that may constitute a conflict of interest, or the appearance of a conflict of interest. We will not engage in any activities that damage Nikon's reputation or financial interests in order to personally benefit ourselves or any third party. We will avoid situations where our personal or family interests may compete with those of Nikon.



#### Our principles

Fair and free market competition results in higher quality products and services, better prices, and social development. Inappropriate restrictions on fair and free competition are prohibited by the competition laws of all countries (these laws may be known as antimonopoly laws or antitrust laws in some countries). Nikon does not tolerate any action that violates domestic and international competition laws.

A conflict of interest may arise when an employee's personal interest conflicts, or may conflict, with Nikon's interest. In the event of a conflict of interest, the purpose and profits of Nikon must take precedence. Individuals must not take advantage of their position at Nikon for their personal gains.



#### What this means for us

We will:

- Be cautious when exchanging information with competitors, and never engage in activities that lead to a suspicion that we are part of, or involved with, a **cartel**<sup>(1)</sup>.
- Ensure that departments that deal with external forces or third parties understand and comply with the basic requirements of all applicable laws and regulations, and that they are able to identify business practices that may be considered illegal .
- Never interfere with retailer pricing because prices are determined by market forces.
- Never make decisions when even the smallest questions or concerns arise without consulting the legal department because competition law is a very complicated field that requires dedicated education and experience.



#### **Explanation of terms**

- (1) **A cartel** (illegal business association) is an association of independent businesses with the purpose of effectively limiting competition in a certain field of business by mutually restraining business activities through following means:
- Price fixing (price cartel).
  - Limitation of production or supply (supply cartel).
  - Restriction of customers (customer restriction cartel).

#### **Q&A**

**Q1** During a trade association meeting the other day, key account managers from two competitors began talking about pricing and sales plans for new products. I left the room in protest because I feel that such discussions are the stuff of cartel meetings. Was I correct in leaving the meeting?

**A1** Yes, you did the right thing. You should also request that the meeting minutes reflect your reason for leaving the meeting. If the topics of price, volume, market share, and/or customers come up at trade association meetings, you must openly state your concern about the impropriety of such discussions and propose that either the discussion be discontinued or that a lawyer be consulted. If your concern is not recognized, you must immediately leave the meeting. Needless to say, you should not attend any meeting at which discussions on price, volume, market share, and/or customers take place. Please contact the appropriate department (e.g. Legal), if you have any questions.

**Q2** My husband owns a printing company that is having financial difficulties. I am in charge of printing product brochures. Can I outsource printing work to my husband's company? The transactional conditions do not benefit Nikon.

**A2** You cannot sacrifice the company's profits for the benefit of yourself or a family member. This case is considered conflict of interest, which means you cannot be involved in the selection of the vendor. Be sure to consult with your supervisor.

## 5. OPERATION PRACTICES

### (7) IMPORT AND EXPORT CONTROL

When we conduct international transactions, whether they involve hardware and software such as our products or components or technical information, we will comply with the applicable laws and regulations related to the export, re-export and import controls, and make true declaration to the appropriate authorities.



#### Our principles

Nikon will comply with relevant laws and regulations in concerned countries and regions in order to maintain international peace and security through Security Export Control. With regard to imports, Nikon will fulfill its tax obligations as a member of society through proper reporting and declaration, in addition to complying with the applicable laws and regulations of each country and region.



#### What this means for us

We will:

- Conduct business transactions only after receiving approval based on a customer/business inquiry screening if any doubt with regard to security export control arises, even for long-standing customers with whom we've dealt in the past or customers from which orders have already been received.
- Confirm that the export destination is not prohibited by security trade control or the subject of economic sanctions, if it is known the items will be exported through a domestic business partner, even if the transactions are made domestically.
- Abide by relevant laws and regulations on imports and exports and report prices accurately.

#### Q&A

**Q1** I received a written promise from a company that also develops, manufactures, uses and/or sells weapons that it will not use the product for the development or manufacture, use or sell of weapons. Is it okay to do business with the company?

**A1** No, you may not do business with the company based solely on a written promise. You must be able to reasonably explain with a customer/business inquiry screening that there is no risk that the product will actually be used to develop or manufacture weapons, even in the future. Please consult either the section expertizing export control or a coordinator designated in your business unit for transactions involving customers and/or applications that have concerns related to the military or weapons.

**Q2** A product (sample) valued at 100,000 yen was sent to me from overseas. The invoice should read 100,000 yen, but as the product was provided free of charge, the invoice showed a value of less than 100,000 yen. May I use this invoice for the customs declaration for cheaper customs duties and consumption tax?

**A2** No, importing a product in such a manner is considered tax evasion. Even if the product was provided free of charge, you must ask the sender to create a new invoice based on the actual value of the product.

## 5. OPERATION PRACTICES

---

### (8) TAXATION

Nikon acts as a responsible global corporate tax citizen in compliance with applicable tax laws and regulations. We seek and encourage an open and honest dialogue between tax authorities and business, and make efforts to resolve issues in case our opinions differ from those of the tax authorities.



#### Our principles

As a responsible tax payer in all countries and regions in which it operates, Nikon will pay all taxes due in accordance with the laws of each country and region. Nikon will also cooperate with regular audits carried out by tax authorities.



#### What this means for us

We will:

- Check to be sure that transactions and dealings carried out in the course of daily business operations are in compliance with the tax laws of that particular country or region. During tax audits, we will answer auditors' questions truthfully.



---

**Group policies related to this chapter:**  
Nikon Global Tax Policy

## 5. OPERATION PRACTICES

### (9) INSIDER TRADING PREVENTION

We will not engage in trading of securities based on material confidential information not available to the general public.



#### Our principles

Employees may receive information concerning Nikon or other listed companies through the course of their work before that information is made public. Employees must not buy or sell securities directly or indirectly based on such information. Doing so is considered insider trading and is prohibited by law. Nikon will strive to prevent insider trading.



#### What this means for us

We will:

- Never trade the stock of Nikon or other companies based on **material nonpublic information**<sup>(1)</sup>, recommend others to do so, or provide others with information not available to the public.
- Keep Nikon's information confidential except when work duties require that information be disclosed, and will not disclose information to third parties without prior permission.



#### Explanation of terms

(1) The followings are considered examples of **material nonpublic information**:

- Financial information.
- R&D information regarding new products or technologies.
- Information regarding mergers with, or acquisition of, other companies or the transfer of business(es).

#### Q&A

**Q** I happened to see information indicating that the price of Nikon stock may increase. I will not buy Nikon stock myself, but can I share the information with my brother-in-law so that he might purchase Nikon stock?

**A** No, you may not. If you know information about Nikon that is not available to the public (insider information), you must not share that information with anyone, including family or friends, until it is made public. If you are unsure about whether the information constitutes insider information, you should consult the designated department of the Nikon company by which you are employed.

## 5. OPERATION PRACTICES

---

### (10) PROPER USE AND MANAGEMENT OF NIKON PROPERTY

We will be responsible for the proper use and management of Nikon's assets including its facilities, equipment, funds, inventory, products, information, intellectual property and software, and will take all reasonable steps to ensure that Nikon's assets are protected from loss, destruction, theft, damage, or misuse. We will not use Nikon's assets for private or fraudulent purposes.



#### Our principles

Nikon owns assets of value that are indispensable to its business activities, including facilities, equipment, cash, inventory, and intellectual properties. Nikon will manage these assets appropriately to prevent their loss, theft, or fraudulent use, and use them only for the intended business purpose. Nikon will manage and use these assets responsibly and correctly record them in accounting ledgers to ensure the reliability of its financial reporting.



#### What this means for us

We will:

- Not use Nikon's assets for our own personal benefit or that of others. We will fully recognize the importance of Nikon's assets on a daily basis and carefully manage and use them in accordance with company rules in order to prevent their loss, damage, or theft.

## 5. OPERATION PRACTICES

### (11) PROTECTION OF INTELLECTUAL PROPERTY RIGHTS

[1] We will recognize that Nikon's intellectual property, such as its patents, **design patents**<sup>(1)</sup>, **trademarks**<sup>(2)</sup>, copyrights and trade secrets, is an invaluable asset to Nikon that must be safeguarded at all times. We will cooperate in establishing, protecting and utilizing Nikon's rights in its intellectual property. We will not permit any third party the right to use Nikon's intellectual property without proper authorization and license from Nikon.

[2] We will respect the intellectual property rights of third parties and will not infringe upon or improperly use their intellectual property, such as its patents, design patents, trademarks and copyrights. We will obtain intellectual property information from third parties using legitimate and appropriate methods.



#### Our principles

Intellectual properties represent an important asset for ensuring the competitive advantages and prosperity of Nikon's businesses. Nikon will obtain, maintain and utilize intellectual properties in a legal and strategic manner. Nikon will take a resolute stance against the actions of others that infringe upon our intellectual property rights in accordance with relevant laws and regulations. In addition, Nikon will respect the intellectual property rights of others and take due care so as not to infringe upon these rights.



#### What this means for us

We will:

- Strive to realize the legal and strategic acquisition, maintenance and utilization of intellectual properties and to take any legal action required to do this realization.
- Never infringe upon the intellectual property rights of others. When unsure of how to deal with intellectual properties, we will not act before consulting with the appropriate department within the Nikon Group.



#### Explanation of terms

- (1) **Design patents** include the external design of a product such as a camera, but it may also refer to the design of parts of a product, such as the red motif on the camera grip or the way images are displayed in a product's LCD monitor. Also, the design of product packaging can be subject to design rights.
- (2) **Trademarks** are used for products and services and may include not only letters, illustrations and symbols, but also three dimensional shapes, colors and sounds. For example, the Nikon logo and NIKKOR product name, and the name of services such as Nikon School, are trademarks.



#### Group policies related to this chapter:

- Nikon Group Basic Intellectual Property Policy
- (Group IP Policy)
- Trademark Handling Rules

#### Q&A

**Q1** A business partner asked if they could use the Nikon logo. What should I do?

**A1** This involves licensing the Nikon logo to another person. To accommodate such a request, you must obtain the prior approval of the Executive Committee of Nikon Corporation, in accordance with company rules. The first step is to contact the Legal and Intellectual Property Division.

**Q2** My department is currently planning a new product. Can we decide on the name of the product and release it as such?

**A2** No, you may not. You may infringe upon the rights of others if you decide on a product name without conducting trademark search. Always contact the Legal and Intellectual Property Division first.

## 5. OPERATION PRACTICES

### (12) SOUND COMMUNICATION

- [1] We will strive to ensure that Nikon's communications, such as its publication, advertising, marketing and promotional information and materials, are accurate, truthful and free from false or misleading statements and will not infringe upon the rights of any third parties.
- [2] We will also strive to avoid advertising in media whose content is highly likely to undermine public order and morality or have a negative impact on society.



#### Our principles

Sharing information in a sincere and accurate manner is indispensable for retaining trust in, and enhancing the value of, the Nikon brand. Nikon will check to be sure that its communication of information does not infringe on the rights of others. Nikon will examine not only the content of information, but also where the information will be presented.



#### What this means for us

We will:

- Abide by the laws and regulations of each country and provide information that is accurate and does not lead to misunderstanding, or an overly positive impression, of actual functions and features when sharing information on products and services.
- Check to be sure that the rights of others, including human rights, copyrights, and portrait rights, are not infringed upon.
- Select advertising media after measuring its effectiveness, and not to advertise with media affiliated with antisocial forces.
- Pay careful attention so as to eliminate relationships with media suspected of connections with antisocial forces and strive to decline interviews from such with our public relations.

#### Q&A

**Q1** A friend of mine from my old days who is now working for a media company asked a question about a press release issued by Nikon the other day. This person is a friend I trust. May I answer her question in detail?

**A1** No, you may not. Information discussed with a person of the media company could appear in actual articles. Ask your friend to contact the department in charge of public relations for any questions.

**Q2** May I promote a new product that I'm in charge of on my social media account or other review sites?

**A2** Be mindful of the following points when using social media for personal use. It goes without saying that you must not post the company's confidential information and you must not post information that makes it appear you are a representative of Nikon. We recommend updating your profile to note that your posts are your personal views and do not represent those of Nikon. Publishing or posting a product review without identifying yourself as a Nikon employee or Nikon stakeholder could be criticized as stealth marketing (advertising a product to people without letting them know they are being marketed to). In addition, such an act could violate the laws and regulations of certain countries and regions. If you are unsure about this, always check with the relevant department before proceeding.



## 5. OPERATION PRACTICES

### (13) APPROPRIATE INFORMATION MANAGEMENT

- [1] We will take every reasonable precaution to safeguard confidential information. The obligation to protect confidential information will continue even after employment with Nikon ends. We will not use such confidential information for our personal purposes.
- [2] We will process personal information, in a fair and lawful manner, in accordance with specified purposes or further in accordance with applicable law.
- [3] We will manage business information including personal information appropriately in accordance with the applicable degree of confidentiality to avoid loss and unauthorized disclosure.



#### Our principles

One of Nikon's most important responsibilities to society is handling all information assets in an appropriate manner. This is also essential for Nikon to earn the trust of customers and grow as a company. There are a growing number of opportunities for Nikon to acquire and use the personal and confidential information of its customers. The consolidation of information and increasing number of people authorized to access this information raise the risk of information leaks. Nikon will rigorously manage to prevent information leaks. Nikon will follow related laws, regulations and company rules and respond immediately in the event of a leak of customer information or other confidential information.



#### What this means for us

We will:

- Comply with company rules, as well as laws and regulations, on information security.
- Attend training on information security and acquire skills and knowledge necessary for safeguarding information.
- Implement information security measures as instructed by Nikon.
- Manage personal and confidential information rigorously so as to prevent the leak or loss of this information.
- Immediately report to a superior and the IT department and strive to prevent reoccurrences whenever an information security incident does occur.
- Make doubly sure that our post does not result in the leaking of confidential company information when using social media for business or even personal use.



#### **Group policies related to this chapter:**

Nikon Group Information Security Policy  
Nikon Group Privacy Protection Statement  
Nikon Group Personal Data Processing Rules  
Nikon Group Social Media Policy

#### Q&A

**Q1** We store customers' confidential information on a file server. Is there anything I should be mindful of?

**A1** When storing confidential information on file servers, be sure to assign access rights (permission) only to those who need to access this information for business reasons. Storing confidential information on a file server that anyone can access is inappropriate from data protection point of view.

**Q2** I received an email from an unknown email address. The subject read "Thank you for your order" and a file was attached. May I open it?

**A2** No, you must not open it. If you receive a suspicious email from an unknown sender, or with an unknown subject, delete it without opening it. Never open a file attached to a suspicious email, or click on any links provided. This poses the risk of infecting your computer with a virus that could result in information leak.

**Q3** I would like to post on my blog some photos taken in front of the railway station on the way home after visiting a company on business, and comments about my impressions of local specialty foods that I ate while I was there. Are there any important points that I need to keep in mind?

**A3** Any items, such as photos, that could result in the leaking of a company's confidential information must not be posted on social media. Even if you are disseminating information on your personal social account after you have finished work while on a business trip, please make sure that the information which you post does not contain any confidential information, such as the following:

- Anything indicating the existence of a relationship between the company that you visited and Nikon
- Anything indicating your connection with the company that you visited as a Nikon employee

While the photo that you have taken may not appear to contain any confidential information relating to the company that you visited, the landmarks in the photo or location data tagged on your photo could lead to unintentional information leakage. Even if you post on your blog anonymously and without stating the name of the company you work for, or of the company that you visited, it is still possible that someone may be able to guess your name and the name of the company that you visited, in a way that you could not have anticipated. Please be aware of the special risks that the Internet poses, and please take great care to ensure that there is no leaking of confidential information involving your blog.

## 6. FACTUAL INFORMATION AND DISCLOSURE

---

- [1] We will strive to disclose accurate information in a timely manner.
- [2] Nikon will strive to accurately report business information. We will follow appropriate accounting practices based on facts to realize timely and proper information disclosure and to fulfill Nikon's tax and other legal obligations. We will not engage in inappropriate accounting practices to secure profits, achieve sales budgets, fulfill budgeted expenses, or for any other reason.



### Our principles

- Correctly conveying the company's stance is a fundamental requirement of highly transparent corporate management. Nikon will use appropriate procedures to disclose accurate information in a timely manner.
- To disclose financial information accurately, Nikon has a responsibility to prepare financial statements without misrepresentations caused by inaccurate accounting that is the result of fraud or error. To fulfill this responsibility, Nikon will record all transactions following appropriate accounting standards at the appropriate time and in the appropriate amount.



### What this means for us

We will:

- Not move ahead or postpone accounting of profits, expenses, or depreciation of assets in order to meet our budget.
- Not engage in actions that could result in fraudulent accounting, such as postponing simple administrative procedures or making mistakes with estimated calculations.
- Account for profits, expenses and asset purchases incurred for business purposes, and for assets and liabilities in an appropriate manner for the disclosure of fact-based financial information.



### **Group policies related to this chapter:**

Group Finance and Accounting Policies and Procedures

### Q&A

**Q** The production costs of a marketing video exceeded the budget. Our department has leftover budget for training. Can I record the cost of this video as a training expense instead of marketing expense?

**A** No. You cannot record marketing expenses as training expenses. To ensure proper disclosures, expenses must be accounted for correctly according to the facts.

# 7. PROVISION OF VALUABLE PRODUCTS AND SERVICES

- [1] Nikon will strive to provide society with useful products and services reflecting customers' expectations and needs.
- [2] We will strive to respond to inquiries and requests fairly and promptly and to provide accurate information in an understandable form to customers to assist them in making sound decisions and judgments.
- [3] We will strive to provide the utmost care in the quality and safety of Nikon's products and services.
- [4] We will also strive to provide user-friendly instructions and other information so that our products and services may be used properly and safely.
- [5] Should safety issues arise, Nikon will promptly implement appropriate measures such as product recalls and make efforts to prevent recurrence.



## Our principles

Nikon will supply unique products with high quality to markets in a timely manner with creative and effective *monozukuri* (craftsmanship), and elevate its brand value.

In addition, safety and environmentally friendly products and services are considered integral aspects of quality, and Nikon will comply with all applicable laws and regulations for ensuring the same. To faithfully maintain quality, we will promote the standardization of related business activities, and instill employees with the necessary knowledge through training and education.



## What this means for us

We will:

- Strive to maintain and improve the quality of products and services, and follow rules created to ensure that the tasks required with each stage, from product planning to marketing to after-sales service, are properly completed.



### **Group policies related to this chapter:**

- Nikon Basic Quality Policy
- Quality Management Directive (QMD)
- Nikon Basic Green Procurement Policy

## Q&A

**Q** I'm in charge of repairs in the Service Department. We ran out of the parts used for a particular repair, but it will be some time until new inventory of those parts is delivered. My superior recommended using a similar part as a replacement, but I'm not sure that is a good idea. What should I do?

**A** You must never use parts other than those designated by Nikon and for which quality has been assured. The use of non-genuine parts could result in problematic incidents from not only a functional, performance, and/or safety standpoint, but also with regard to legal compliance as well. If you are unsure about the appropriate response, please consult with the relevant business department.

## 8. COMMUNITY RELATIONS

- [1] We will strive to understand and respect the cultures, values and customs of each community in which Nikon is doing business.
- [2] Nikon will actively promote participation in activities which contribute to local communities and which serve public interests. Nikon will comply with all applicable laws relating to charitable donations in the countries in which Nikon operates.
- [3] We will cooperate in maintaining social order, and we will not engage in antisocial, disruptive activities.



### Our principles

To facilitate business activities, it is essential that Nikon strives to earn the trust of local communities by understanding and respecting their culture, values and customs. It is also vital that we grow together with communities so that we may continue to carry out business activities. Nikon aims to address social issues and to build a foundation for growing together with local communities by actively promoting community contribution activities (corporate citizenship activities) and gaining a deep understanding of local customs and the like. Nikon will strive to maintain social order and will make charitable donations in compliance with local laws and regulations. Nikon will never engage in antisocial activities such as bribery, threats, extortion, violence or discrimination.



### What this means for us

We will:

- Actively participate in activities that contribute to local communities (corporate citizenship activities) so that we may continue to grow with these communities.
- Comply with national and local laws and regulations regarding charitable donations and fulfill accountability to stakeholders with transparency and fairness.
- Never be involved with people or organizations that engage in antisocial behavior, such as bribery, threats, extortion, violence or discrimination, and will cooperate to maintain community order.



### **Group policies related to this chapter:**

Nikon Corporate Citizenship Policy  
Donation Standards

### Q&A

**Q1** What should the focus be when planning activities for contributing to the local community (corporate citizenship activities)?

**A1** Understand the public interests that have a positive impact on stakeholders and Nikon. Community contribution activities (corporate citizenship activities) should be planned based on the following three points.

- Activities in the fields of environment, education, art and science, and health
- Activities that target the next generation
- Activities that effectively use Nikon's resources such as technology, know-how, etc.

**Q2** What should I consider when choosing recipients of or partners in community contribution activities?

**A2** Choose recipients and partners that are trustworthy, such as government organizations or organizations approved by a government. If you are unsure whether a group is an appropriate recipient, contact the department in charge of CSR.

# REPORTING/CONSULTING SYSTEM, CONSEQUENCES OF VIOLATION

We are responsible for reporting any violation or potential violation of the Code of Conduct.

## [1] Reporting/Consulting System

Personnel who become aware of a violation or a potential violation of the Code of Conduct should report it promptly to or consult with their immediate supervisor and/or to the reporting/consulting office (or the reporting/consulting process applicable at each Nikon company) or designated section/person of the Nikon company by which they are employed. If there are any questions, Personnel should consult with their supervisor and/or to the reporting/consulting office or designated compliance section/person of the Nikon company by which they are employed.

## [2] Non-retaliation

Personnel who report a violation or a potential violation of the Code of Conduct will not receive disadvantageous treatment or retaliation because of such reporting.

[3] Should a violation or potential violation of the Code of Conduct be reported to Nikon, the appropriate Personnel within Nikon will promptly investigate the facts, provide a resolution, and take appropriate measures to prevent a recurrence.

## [4] Consequences of Violation

Violation of the Code of Conduct may result in disciplinary action by Nikon up to and including termination of employment, and in case of a violation of law, civil and/or criminal liability.



## Our principles

The Reporting/Consulting System is an important mechanism for Nikon itself in resolving and rectifying problems, and in minimizing the effects of these problems. It is also a mechanism for maintaining a sound workplace environment for employees to carry out their duties without undue worries. Leaving problems unaddressed could result in a serious situation that leads to significant damages, penalties, violation of laws or loss of trust in Nikon.



## What this means for us

We will:

- Immediately report to, or consult with, a superior when a concern arises in the workplace.
- Not keep issues to ourselves, but will use Nikon's Reporting/Consulting System when issues that may be difficult to bring up with a superior due to their nature arise.
- Never use the Reporting/Consulting System for improper purposes such as personal gain, libel or slander.

## Q&A

**Q1** Will my use of the Reporting/Consulting System be treated in a confidential manner?

**A1** Yes, the Reporting/Consulting System is operated in a manner that thoroughly protects reporters while respecting their intentions. In most cases, the name of the reporter will only be disclosed to the contact point. Depending on the nature of the reported case, relevant departments may be asked to investigate. In the event the investigation cannot proceed without disclosing the reporter's name, or when the reporter can be easily identified based on the nature of the matter, the reporters will be asked in advance whether their names may be disclosed. Only with the reporters' agreement will their names be disclosed to the other party in a confidential manner.

**Q2** I would like to use Nikon's Reporting/Consulting System, but I'm worried that I might be subjected to unfair treatment from Nikon if I do so.

**A2** No, you will not be subject to unfair treatment from Nikon for using the system. If you encounter any retaliation, please don't hesitate to report it. The issue will be addressed promptly. If the source of the retaliation is identified and proved to have existed, appropriate measures including disciplinary action will be taken.

# CODE OF CONDUCT ADMINISTRATION

---

- [1]** Established, Revision and Discontinuance  
Establishment, revision and discontinuance of the Code of Conduct can occur at any time by Nikon Corporation, and will take place first with a proposition from the Chairperson of the Compliance Committee of Nikon Corporation and then with an application to the Executive Committee of Nikon Corporation who will make a final decision. Minor changes will be decided by the Chairperson of the Compliance Committee of Nikon Corporation.
- [2]** Where the Code of Conduct differs from local laws, Nikon must always follow the higher standard. If in doubt, Personnel should talk to their supervisor and consult with the designated compliance section/person of the Nikon company by which they are employed about the appropriate conduct to adopt.

This Code of Conduct is compiled in 16 languages listed below and in the case of ambiguity in the understanding of the text, the English text shall prevail: English, Chinese(Simplified), Chinese(Traditional), Czech, Dutch, French, German, Hungarian, Italian, Japanese, Korean, Laotian, Polish, Russian, Spanish, Thai

## **Disclaimer**

The explanatory notes and Q&As are set out for illustrative purpose only, and do not form part of the main body of the Code of Conduct.

In order to enable Personnel to better understand the Code of Conduct on an ongoing basis, Compliance Section, Legal and Intellectual Property Division/ Administration Department, Group Governance and Administration Division/Corporate Sustainability Department of Nikon Corporation may modify the contents or expand the scope of the explanatory notes and Q&As to address the queries received from Personnel from time to time.

May 1, 2001 (Established)  
April 1, 2004 (Revised)  
May 15, 2007 (Revised)  
April 4, 2011 (Revised)  
January 1, 2018 (Revised)

**NIKON CORPORATION**

Compliance Section, Legal & Intellectual Property Division  
Administration Department, Group Governance & Administration Division  
Corporate Sustainability Department

Issued date: October 1, 2021 (Modified)