

Nikon Group Slavery and Human Trafficking Statement for the fiscal year ended March 2025

This statement is made in accordance with the United Kingdom Modern Slavery Act of 2015 to explain actions we have taken during the fiscal year ending March 31, 2025 (“FY2024”). The Nikon Group, Nikon Corporation and its consolidated subsidiaries (“Nikon”, or “we”) recognizes that its business activities may impact the human rights of all stakeholders and strives to ensure that it does not commit or contribute to human rights violations. We hereby provide this disclosure statement regarding our activities to prevent and tackle modern slavery and human trafficking.

a. Overview of the company, business and supply chain

Nikon has been engaged in various business fields, such as Imaging Products (digital cameras and interchangeable lenses), Precision Equipment (FPD lithography systems and Semiconductor lithography systems), Healthcare (microscopes and retinal diagnostic imaging systems), Components (optical components, EUV related components, etc.), Industry Metrology, and Digital manufacturing (industrial machinery and optical processing machines), etc., based on the opto-electronic and precision technologies that Nikon has developed since its establishment in 1917. Nikon manufactures and sells such equipment and apparatuses. Also, Nikon delivers integrated solutions encompassing end products, services and components. Details of our company and business information can be found on the “Corporate Information” page of the Nikon Corporation’s website.

<https://www.nikon.com/company/corporate/>

Nikon’s component parts and a small portion of the final products are supplied from procurement partners, in and outside of Japan. More than 90% (calculated by the transaction amount in the country in which they are located) of procurement partners are based in Japan, China and Southeast Asia.

Details can be found on the “Sustainability Report (Materiality 6: Building a Resilient Supply Chain)” page of the Nikon Corporation’s website.

<https://www.nikon.com/about/sustainability/report/>

b. Policies related to modern slavery and human trafficking

Nikon Code of Conduct/ Nikon Human Rights Policy

Nikon has the “Nikon Code of Conduct” (“Code”) in place where we set out our stance on social responsibility and the standard of conduct for individuals who work for Nikon.

(See <https://www.nikon.com/about/sustainability/nikon-sustainability/codeofconduct/>).

The Code includes the sections of “Respect for Human Rights” and “Social Responsibility in the Supply Chain”, where we clarify our stance against forced labour and child labour not only with respect to Nikon, but also our suppliers and business partners.

Since April 2019, we have our “Nikon Human Rights Policy” (“Policy”)

(https://www.nikon.com/about/sustainability/society-labor/human-rights/human_rights_policy.pdf) in place in order to provide further detail on our approach to addressing human rights issues related to our business activities, based on the Code.

Nikon has revised its Human Rights Policy on April 1, 2025 in order to respond to societal demands and changes in its business operations and to further promote efforts to respect human rights. In making the revision, a human rights impact assessment was conducted to identify important human rights issues that should be addressed, taking into account the current business environment surrounding Nikon.

In this assessment, we interviewed people within the company to understand the rights holders in Nikon’s value chain and prioritized them in terms of the importance of human rights issues to Nikon and their relevance to our business. As a result, we identified six salient human rights issues: “health and safety”, “working environments”, “worker’s human rights in the supply chain”, “zero tolerance for child labour and forced labour”, “ethical use of AI”, and “access to remedy”.

These salient human rights issues are clearly stated in our human rights policy, and we are committed to addressing them in a planned manner and to seeking continuous improvement through dialogue with stakeholders.

Responsible Business Alliance (RBA) Code of Conduct

Furthermore, Nikon has been a member of the RBA since 2018, the world's largest industry coalition dedicated to responsible business conduct in global supply chains. Nikon strives to comply with the RBA's code of conduct which specifies responsibilities for member companies, such as to improve working environments in their own organisation and supply chains or to support the rights and wellbeing of workers.

Nikon CSR* Procurement Standards

The Nikon Group recognises that socially responsible procurement activities are essential for the sustainable development of business, both for ourselves and for our procurement partners. As for our supply chain, we require our procurement partners to comply with the "Nikon CSR Procurement Standards" (https://www.nikon.com/company/corporate/procurement/pdf/csr-procurement2_e.pdf), which are based on the RBA's code of conduct, articulating the prohibition of forced and child labour, bonded (including debt bondage) or indentured labour, involuntary prison labour, and slavery or trafficking of persons, as well as the requirements on working hours and wages.

**Corporate Social Responsibility*

Responsible Minerals Sourcing Policy

In response to issues related to conflict minerals, we stipulated the "Responsible Minerals Sourcing Policy". Recognising there are mineral resources that are extracted and traded in conflict-affected and high-risk areas which may become a source of human rights abuses that include child labour and forced labour, or a source of environmental destruction, conflict, and social injustice, we are collaborating with our procurement partners on surveys of conflict mineral sources and on due diligence.

Details can be found on the "Responsible Minerals Sourcing Report" page of the Nikon Corporation's website. https://www.nikon.com/company/sustainability/society-labor/supply-chain/Responsible_Minerals_Sourcing_Report_2024_Survey.pdf

c. Due diligence process related to modern slavery and human trafficking

d. Risk assessment and risk management related to modern slavery and human trafficking

e. Measurement by appropriate indicators and effectiveness of steps to endeavour to ensure that slavery and human trafficking is not taking place

Nikon

In the above Nikon Human Rights Policy, we are working to address particularly salient human rights issues related to Nikon's business activities. In FY2024, we set a target of a 90% compliance rate with the RBA Code of Conduct (at production sites) and implemented improvement activities through RBA Code of Conduct self-assessment. From FY2025, we will set a new target of a 100% participation rate in the assessment of human rights due diligence (RBA-based human rights risk survey) within our company and will implement initiatives accordingly.

<Efforts to comply with the RBA Code of Conduct>

Based on the results of the RBA Code of Conduct self-assessment conducted in FY2022, Nikon's domestic and overseas manufacturing companies and each Plant have formulated improvement plans for FY2023 and implemented those improvement plans in FY2024. To rectify the nonconformity identified in the RBA Validated Assessment Program (VAP) re-audit conducted at the Kumagaya Plant in FY2023, we have revised its work rules by removing "salary reduction" from the types of disciplinary actions at Nikon and Group companies in Japan.

In addition, the Nikon Group conducts human rights and labour surveys for all group companies every year to

continuously improve its response to human rights. Until now, we mainly checked whether there were migrant workers or foreign technical intern trainees who are at risk of human rights violations, but in order to ensure that we understand the risks regarding the six identified salient human rights issues, we conducted a fundamental review of the questionnaire in FY2024. From FY2025, we will redefine RBA efforts as human rights efforts and conduct surveys based on the RBA Code of Conduct also at non-manufacturing group companies in Japan and overseas. The survey includes questions to understand whether there is a company policy prohibiting forced labour and labour resulting from human trafficking, whether all workers have employment contracts in their native language or, if not permitted by applicable laws, a translation in a language they can understand, and whether they understand and sign the contents of the employment conditions. If risks are found as a result of the survey, we will develop an improvement plan and carry out improvement activities.

<Reporting and consulting (whistleblowing) system>

We have internal as well as regional or local external hotline(s) by which employees are able to report if they become aware of an actual or potential violation of the Nikon Code of Conduct. It allows employees to raise concerns anonymously where the national law permits to do so. In FY2025, we plan to establish a grievance mechanism that will involve an independent third-party expert and that all stakeholders can consult with.

Supply Chain

<Building a resilient supply chain>

Nikon recognizes the establishment of a resilient supply chain as a material issue and has set a goal to achieve a 100% implementation rate of human rights due diligence for key procurement partners by FY2025.

Key procurement partners are selected based on factors such as transaction amount, criticality and substitutability of the parts, dependency, and country risk as well as environmental, social, and governance risk assessments (ESG evaluations). A CSR survey (self-assessment method) is conducted every three years for these key partners.

Furthermore, for procurement partners deemed to have high CSR procurement risks or deemed to be important, a third-party audit is conducted on annual basis to assess risks in their supply chain, including modern slavery and human trafficking, and we request and provide support for improvements.

We may review the business relationship with procurement partners who are found to have significant violations of Nikon's CSR procurement standards, who do not cooperate sufficiently toward survey or audits, or who fail to make any improvements regarding identified issues.

<CSR Survey and Audit>

FY 2024 marked the second year of our three-year CSR survey assessments cycle. This year, we conducted a CSR survey assessment targeting 15 key procurement partners newly identified through M&A and other activities. We confirmed that 14 of them met the target criteria. For the 1 company that did not meet the target criteria, we issued a request for improvement regarding non-conformity items related to labour, health and safety, environment, and ethics. We have asked this company to formulate an improvement plan, and we will monitor its progress and verify the results based on evidence, with the goal of completing the improvements within FY2025. In addition, we conducted CSR audits for three companies, 1 of which along with 2 others audited last year, we requested improvements on the issues identified during the audits and confirmed that the improvements had been completed. Specific issues included: insufficient communication of internal laws and regulations, lack of emergency exit signage, collection of fees at the time of new employment, expired first-aid kits in some workplaces, inadequate safety checks and inspections of factory equipment, and excessive working hours. For the remaining 2 companies, we are similarly providing requests and support for improvement, with the goal of completing the improvements within FY2025. We plan to increase the number of companies subject to audits in FY2025.

We also conducted a CSR survey assessment for 3 newly engaged procurement partners and confirmed that they met the target criteria, after which we commenced business with them as procurement partners. We conducted the same assessment for seven key partners beyond the secondary procurement level and confirmed that they also met the target criteria.

<Responsible minerals sourcing>

In light of conflict mineral issues, we endeavour to prevent human rights violations, such as modern slavery and human trafficking, through implementing our Responsible Minerals Sourcing Policy and conducting investigations of our product components on usage and supply chain of mineral resource.

As in previous years, we conducted a 3TG* survey of all Business Unit products, and also expanded the scope of the cobalt survey to cover all Business Units.

Also, continuing from last year, FY2024 we have continued to make donations to the Resilience Enhancement Project conducted by the certified non-profit organization Terra Renaissance in the Democratic Republic of Congo to support the people affected by human rights abuses related to minerals.

Furthermore, we held a lecture by the certified non-profit organization Terra Renaissance for approximately 160 students of Shinagawa Shoue Junior and Senior High School, providing an opportunity for both students and local residents to deepen their understanding of the conflict minerals issue. A recording of the lecture was also distributed to our employees to promote and reinforce awareness of responsible mineral sourcing.

*tin, tantalum, tungsten and gold.

f. Training and Capacity building related to modern slavery and human trafficking

We consider it important to raise awareness and increase sensitivity on human rights risks among employees in order for our company to respond to human rights issues including modern slavery and human trafficking.

Nikon

In FY2024, we continued to conduct training on human rights for all directors and employees in Nikon group companies in Japan through e-learning as in the previous period. The completion rate was 83%.

Every year on World Human Rights Day in December, the CEO's message outlining our principle on respecting human rights is communicated to employees globally via our newsletter. Theme of the message in FY2024 was "Respect for Human Rights and DEI (Diversity, Equity and Inclusion) Together with Everyone" to strengthen and ensure Nikon Group's commitment to respecting human rights. It was to advocate for establishing a work environment where the rights of all employees are respected.

In December 2024, we held a human rights event titled "Towards World Human Rights Day 2024", mainly targeting our domestic employees. The event included a series of talk sessions focusing on human rights, which lasted for approximately one month and saw the participation of numerous employees. Additionally, as part of our training program for new employees, we conducted training sessions with a focus on human rights.

In Europe, we had training sessions on modern slavery and human trafficking, targeting employees who are in the functions to hire people, to procure/purchase goods & services, to maintain offices/shopfloor. In total 323 employees completed the training in Nikon Europe head office and UK branch office, Optos Plc., Nikon Precision Europe GmbH, Nikon SLM Solutions AG. In FY2025, we aim to have the relevant employees of Nikon Metrology UK Ltd., and Nikon X-Tek Systems Ltd., complete the training.

We also use a recording of a seminar by the certified non-profit organization Terra Renaissance in FY2024 as a teaching material to deepen understanding of the issue of conflict minerals and how these issues relate to procurement activities for all employees.

Employees of our procurement departments and sections

The Supply Chain Subcommittee chaired by the General Manager of the Procurement and Logistics Division and composed of the Heads of Sustainability, Heads of Quality Assurance, and Procurement Departments from each business unit, as well as executives from group manufacturing companies convenes twice a year to deliberate on the management of risks and opportunities related to the supply chain, including human rights issues, and to review activity reports and plans aimed at building a resilient supply chain.

Under this subcommittee, the Sustainable Procurement Promotion Council (held monthly) and the Green Procurement Promotion Council (held twice a year) have been established. These councils work in collaboration with procurement departments, relevant divisions, and administrative departments at each

manufacturing site to promote concrete initiatives.

Furthermore, to promote procurement activities that consider social issues such as human rights, labour conditions, occupational health and safety, and the environment, and to enhance the stability of the supply chain, an annual training session is held for internal procurement practitioners and new employees. This training deepens understanding of the fundamentals of procurement operations and the surrounding social issues. In FY2024, training and a Q&A discussion were conducted on the importance of human rights protection and its relevance to procurement operations, aiming to further raise employee awareness and understanding.

Procurement partners

The Nikon Group holds an annual “Sustainable Procurement Briefing” to help procurement partners understand our policies and approach to sustainability promotion and quality management. In FY2024, the briefing was held four times over two days for procurement partners in Japan, China, and Thailand, with a total of 1,078 companies and 1,180 participants in attendance. During the briefing, we emphasized the importance of corporate responsibility and initiatives related to human rights, and called for active promotion and collaboration.

Additionally, we recognized procurement partners who made outstanding contributions to sustainability promotion and quality management by demonstrating exceptional flexibility, responsiveness, and resilience. Their achievements were honoured through awards.

This Statement was reviewed and approved by the Nikon Corporation’s Board of Directors on 10/09 2025.

Further, this Statement was reviewed and approved by Nikon Europe B.V.’s Board of Directors on 01/08 2025, Optos plc’s Board of Directors on 13/08 2025, Nikon Metrology UK Ltd.’s Board of Directors on 11/08 2025, Nikon X-Tek Systems Ltd.’s Board of Directors on 11/08 2025, Nikon Precision Europe GmbH’s Board of Directors on 29/07 2025, and Nikon SLM Solutions AG’s Board of Directors on 25/07 2025. All of these companies are subject to the UK Modern Slavery Act.

10/09 2025



Muneaki Tokunari
Representative Director
President
Nikon Corporation

01/08 2025



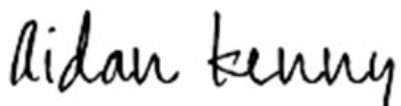
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