



Introduction

This document sets out the tax strategy of the following UK companies, part of the Nikon Group of companies controlled by Nikon Corporation, a company incorporated in Japan.

Nikon Metrology UK Limited
X-Tek Systems Limited
3D Scanners Limited

In this strategy, references to 'the company' relates only to the entities included in the above list.

Nikon Corporation is a global leader in manufacturing opto-electronics and precision technologies. The company manufactures, sells and services a range of metrology and inspection solutions to the aerospace, automotive and other manufacturing industries worldwide.

The company ensures the tax strategy is:

- adopted and followed consistently by all subsidiaries
- in line with Nikon Corporation's approach to corporate governance and risk management

The tax strategy is published on the company's website and is publicly available to all stakeholders for the purposes of complying with paragraph 16(2) of Schedule 19 of the Finance Act 2016.

Tax Commitment

The company pays tax in accordance with relevant laws and regulations in the countries in which it operates. Our approach is based on the following principles:

1. Tax Risk Management

The company manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax.

The level of risk that the company accepts in relation to taxation is consistent with its overall objective of achieving certainty in its tax affairs.

As part of its tax governance, the company has appointed a Senior Accounting Officer, a position required by UK tax law. This is a requirement for the senior finance officer of the company to take personal responsibility for the quality of UK tax compliance processes.

The Senior Accounting Officer is responsible for and operates an effective tax control framework to identify key tax risks and to reduce uncertainty through appropriately designed and operated controls.

Where necessary, the company engages external advisors to provide technical expertise in specialist areas in order to minimise uncertainty and risk.

2. Tax Compliance

We are committed to meeting our tax compliance obligations on time and paying the right amount of tax in the right place. We maintain tax accounting processes which support our filings to be accurate and assist us to comply with the tax law and regulations in the UK and other tax jurisdictions in which we operate.

3. Tax Planning

The company does not engage in any artificial tax arrangements. The company maintains a commercial focus to its operations and to meet its objective to control unnecessary costs, the company utilises tax reliefs and allowances prescribed by the legislation in the way in which they are intended to be used.

Transactions between Group companies are conducted on an arms-length basis in accordance with appropriate transfer pricing rules. This ensures the group's profits are taxed where economic activities are performed.

Where there is uncertainty or complexity in our business arrangements, appropriate external advice is sought and utilized.

4. Relationship with HMRC

As a company, we seek to be transparent in all of our dealings with HMRC. Where possible and appropriate, we are proactive with the tax authorities to ensure any issues that arise are dealt with in an open and constructive way and that we work with HMRC to resolve any disagreements in a timely manner.

This tax strategy has been approved by the Board of Directors, and is effective for the year ending 31 December 2018. It will be reviewed and updated where appropriate annually. The Board is responsible for setting and monitoring the tax strategy and the Senior Accounting Officer is accountable to the Board for the implementation of the tax strategy and management of tax risk.