

Nikon Group Slavery and Human Trafficking Statement for the fiscal year ended March 2026

This statement is made in accordance with the United Kingdom Modern Slavery Act 2015 to explain actions we have taken during the fiscal year ending March 31, 2026 ("FY2025"). The Nikon Group, Nikon Corporation and its consolidated subsidiaries ("Nikon", or "we") recognises 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), Industry (optical components, EUV related components, etc.) and Digital manufacturing (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 finished products are supplied from procurement partners, in and outside of Japan. More than 89% (based on transaction value by 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" page of the Nikon Corporation's website.

<https://www.nikon.com/company/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/company/sustainability/management/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.

Based on this Code, Nikon has established the "Nikon Human Rights Policy" to clarify how Nikon addresses human rights issues related to its business activities. The Nikon Human Rights Policy pledges to systematically address six salient human rights issues ("health and safety", "working environments", "workers' human rights in the supply chain", "zero tolerance for child labour and forced labour", "ethical use of AI", and "access to remedy") and to continuously improve these issues through dialogue with stakeholders.

https://www.nikon.com/company/sustainability/society-labor/human-rights/human_rights_policy.pdf

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

Nikon recognises that socially responsible procurement activities are essential for the sustainable development of business, both for us 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 mineral resources, 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, 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_2025_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

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Human Rights Due Diligence

We are working on the six salient human rights issues identified in the above-mentioned “Nikon Human Rights Policy”. Specifically, we are conducting human rights self-assessment surveys based on the RBA Code of Conduct and the RBA VAP Audit Manual to identify human rights risks. In FY2024, we revised the human rights risk self-assessment questionnaire to more accurately grasp the risks related to the six salient human rights issues. This questionnaire includes questions to ascertain whether there are migrant workers or foreign technical trainees who are particularly vulnerable to human rights risks, whether there is a company policy prohibiting forced labour and labour resulting from human trafficking, and whether all workers have employment contracts in their native language or a language they understand and understand the content of their employment conditions. In FY2025 we have set a goal of achieving a 100% implementation rate of human rights due diligence (RBA-based human rights risk self-assessment) within our company, and expanded the scope to include non-production group companies in addition to production group companies previously covered, thereby strengthening the understanding and management of human rights risks throughout the entire value chain.

The results of the human rights risk self-assessment were evaluated considering severity and priority. The conformity rate for the entire Nikon Group was 88%. Based on the results, feedback was provided to each company regarding non-conformance or matters requiring improvement, and they were requested to formulate and implement improvement plans. For the most critical risks (working hours, evacuation drills, provision of emergency kits, etc.), corrective action was given a higher priority, and follow-up measures were implemented to improve effectiveness. Furthermore, from FY2025, subcontractors were also included, and explanatory materials regarding the most critical risks were shared.

In FY2026, Nikon Group companies plan to implement the improvement plans formulated in FY2025. By steadily running the cycle of investigation, evaluation, improvement, and verification, Nikon will establish a commitment to respecting human rights throughout the group and lead to continuous improvement.

Human Rights Grievance and Consultation Desk

Nikon has established multiple reporting and consultation channels to ensure appropriate redress and

correction of human rights violations in its business activities. For employees, an ethics hotline has been set up where they can consult and report violations of the Code and human rights violations in the workplace. In September 2025, Nikon established a new “Human Rights Grievance and Consultation Desk” that is accessible to all stakeholders regarding human rights violations related to Nikon’s business activities and value chain. This service is positioned as a remedy based on international human rights norms such as the UN Guiding Principles on Business and Human Rights and accepts consultations and reports not only from employees but also from external parties such as business partners, subcontractors and local communities. This contact point is operated by the Japan Center for Engagement and Remedy on Business and Human Rights (JaCER), which receives reports (as of April 4, 2026, the JaCER website is available in 34 languages). Nikon takes the lead in considering subsequent response policies, engaging in dialogue with whistleblowers, and working towards resolving the case. When making a report, the confidentiality of the whistleblower and the content of the report is appropriately managed, and any adverse treatment or retaliation as a result of making a report is prohibited.

<https://www.nikon.com/contacts/humanrights/>

Stakeholder Engagement

Nikon considers engagement with its employee union, which represents its employees, to be one of its important initiatives. In addition to the regular dialogue between management and employees, Nikon Corporation held a study session with the union with the aim of sharing the content of its revised human rights policy (revised in April 2025) and future initiatives, as well as exchanging opinions, from a human rights perspective. Nikon plans to continue these dialogues in the future.

Governance System

Nikon’s efforts and progress regarding its human rights policy are deliberated by Nikon Corporation’s Sustainability Committee, chaired by the President, and are then reviewed and reported to the Executive Committee before being overseen by the Board of Director in Nikon Corporation. Under the Sustainability Committee, there are the Supply Chain Subcommittee and the Human Rights Subcommittee, who are responsible for necessary investigations, information gathering, and the formulation of response plans, and which review activities related to human rights initiatives within Nikon and its supply chain.

Supply Chain

Concepts for building a resilient supply chain

Nikon recognizes the establishment of a resilient supply chain as a material issue and has set a goal of achieving a 100% human rights due diligence rate for key procurement partners within a three-year cycle by FY2025. This goal was achieved in 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 self-assessment survey is conducted every three years for these key partners.

Furthermore, for procurement partners deemed to have high or particularly significant CSR procurement risks, we conduct CSR audits (second-party audits) to identify and address supply chain risks, including modern slavery and human trafficking, by requesting and supporting improvements. If a significant violation of Nikon CSR procurement standards is confirmed, or if sufficient cooperation with the questionnaire assessment/audit is not obtained, or if the procurement partner fails to make any improvements to address the issues, we will review the business relationship, including suspending transactions or terminating contracts.

CSR self-assessment survey and Audit

FY2025 marked the third year of our three-year CSR self-assessment survey cycle. This year, we conducted CSR self-assessment survey on four newly identified key primary procurement partners through M&A and other means and confirmed that all of them met our target standards.

In addition, we conducted CSR audits for five companies in FY2025. For these five companies, we requested improvements and provided support regarding the issues identified in the audits, and these improvements are expected to be completed by the end of FY2026. Furthermore, for two companies that were audited last

year and had issues identified, we requested improvements and confirmed that the improvements had been completed. Specific issues include “long working hours”, “insufficient one day of leave per week”, “failure to document and disseminate information about legal updates internally”, and “inadequate placement of first-aid kits and their expiration dates”.

Furthermore, we conducted CSR self-assessment survey with 14 new procurement partners to confirm that they met our target standards before commencing business with them. We also conducted CSR assessments with one major partner from the second-tier suppliers beyond to confirm that they met our target standards.

Responsible Mineral Sourcing

Regarding issues related to mineral resources, we adhere to our Responsible Minerals Sourcing Policy and continuously conduct annual supply chain surveys aimed at identifying and mitigating risks associated with the minerals contained in our products, thereby striving to prevent complicity in human rights abuses such as modern slavery and human trafficking. In FY2025, we conducted 3TG* surveys of all products across all business units as in previous years and also continued our surveys of cobalt.

Furthermore, as in the previous year, we continued to donate to resilience improvement project in the Democratic Republic of Congo through the certified NPO Terra Renaissance in FY2025 to support the people of the country, where human rights abuses related to minerals are a major problem.

In addition, we held a lecture by the certified NPO Terra Renaissance for Nikon’s procurement partners. Through this lecture, we hoped to encourage our procurement partners to proactively conduct due diligence and to deepen their understanding of issues related to mineral resources. An archive of the lecture was also distributed to our employees to promote and solidify their understanding of responsible mineral procurement.

**Tin, tantalum, tungsten, 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 including modern slavery and human trafficking.

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Every year in December, coinciding with World Human Rights Day, the president of Nikon sends a message to employees through the company newsletter. For FY2025, in order to further strengthen and solidify Nikon’s stance on respecting human rights, the theme was “Let’s show respect for human rights in our daily activities”. The contents of the Nikon Human Rights Policy, which was revised on April 1, 2025, were communicated, and the importance of each individual adopting a human rights perspective in their daily work and putting it into action was emphasized. In December 2025, a human rights event titled “World Human Rights Day 2025” was held, mainly for employees in Japan. This event, which lasted for about a month, included lectures and talks on the theme of human rights, and was attended by many employees. In addition, training on human rights was conducted as part of the training program for new employees.

Furthermore, we use recordings of lectures given by the certified NPO Terra Renaissance as teaching material to deepen our understanding of conflict mineral issues and to ensure that all employees understand how these issues relate to our procurement activities.

Employees of our procurement departments and sections

The Supply Chain Subcommittee chaired by the General Manager of the Procurement & Logistics Sector 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 Conference (held monthly), the Green Procurement Promotion Conference (held twice a year), and the Procurement Quality Liaison Conference (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 FY2025, we have worked to improve employee awareness and understanding by conducting training and Q&A discussions on “the importance of human rights protection and its relationship to procurement operations” and “the importance of collaboration with other departments”. In addition, the procurement department and the sustainability department jointly conduct discussion training to envision a sustainability vision for the procurement field, promoting increased employee commitment and fostering an organizational culture.

Procurement Partners

Nikon holds annual “Sustainable Procurement Briefings” to ensure that our procurement partners understand our policies and approach to ESG promotion and quality management. In FY 2025, we held a total of four briefings over three days for procurement partners in Japan, China, and Thailand, with 1,034 companies and 1,266 participants. In these briefings, we emphasize the importance of corporate responsibility and commitment to human rights and call for their promotion and cooperation.

Furthermore, we recognized and honored procurement partners who demonstrated outstanding flexibility, responsiveness, and high resilience in promoting ESG and quality management, making significant contributions.

This Statement was reviewed and approved by the Nikon Corporation’s Board of Directors on 04/09 2026.

This Modern Slavery and Human Trafficking Statement is made on behalf of Nikon Corporation and the relevant group companies listed in Schedule [X] (the “Reporting Entities”).

This statement has been approved by the board of directors (or equivalent governing body) of each of the Reporting Entities. Nikon Corporation has been authorized to sign this statement on behalf of the Reporting Entities.

04/09 2026

Nikon Corporation

Representative Director and President, CEO

Yasuhiro Ohmura



Schedule [X]

Reporting Entities : Approval Date by the Board of Directors

- Nikon Europe B.V. : 31/07 2026
- Nikon Metrology Europe NV : 30/07 2026
- Nikon Metrology UK Ltd. : 23/07 2026
- Nikon X-Tek Systems Ltd. : 28/07 2026
- Optos plc : 20/08 2026
- Nikon Precision Europe GmbH : 21/07 2026
- Nikon SLM Solutions AG : 21/07 2026