

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.

2. Respect for Human Rights

- [1] Nikon has signed the UN Global Compact, 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 or child labor, and expect Nikon’s suppliers and business partners to do the same.

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 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.

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.

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.

(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.

(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.

(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 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.

(5) Lobbying and Political Donations

Nikon will comply with all applicable laws relating to lobbying and political donations in the countries in which Nikon operates.

(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.

(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.

(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.

(9) Insider Trading Prevention

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

(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.

(11) Protection of Intellectual Property Rights

- [1] We will recognize that Nikon's intellectual property, such as its patents, design patents, trademarks, 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.

(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.

(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.

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.

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.

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 anti-social, disruptive activities.

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.

Code of Conduct Administration

[1] Establishment, 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 Business Conduct 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 Business Conduct 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.