

CSR Activities Promotion

Aiming for a fair and transparent management capable of enjoying stakeholders' confidence, the Nikon Group is promoting CSR activities from the standpoint of socially responsible management.

Nikon Charter of Corporate Behavior and Nikon Code of Conduct

The "Nikon Charter of Corporate Behavior" and "Nikon Code of Conduct" define the corporate philosophy, corporate objectives and business guidelines of the Nikon Group. Outlining the basic stance and general standards of behavior of the Nikon Group, they stress adherence to statutes in all business activities and proper conduct from an ethical standpoint as well as from the viewpoint of social responsibility.

Nikon has also prepared the "Nikon Rules of Action" guidelines on easily-carried printed cards to provide assistance in the event of a disaster when making judgments may be difficult.

The "Nikon Charter of Corporate Behavior", "Nikon Code of Conduct" and "Nikon Rules of Action" guidelines are distributed to all Nikon Group directors, employees, part time employees and temporary personnel.

At overseas subsidiaries, business is performed based on the Nikon Group "Nikon Code of Conduct" in line with local laws, customs and culture. In the United States and Europe, preparation of independent codes of conduct is currently in progress.

Nikon Code of Conduct

Chapter 1

Standards of Employee Behavior

1. Contribution to the environment and society
 - (1) Environmental protection and safety assurance
 - (2) Promotion of activities contributing to society
2. Well-rounded activities with regard to Company stakeholders
 - (1) Respecting the Anti-Monopoly Law and assurance of a level playing field
 - (2) Fair selection of suppliers
 - (3) Gifts and entertainment
 - (4) Dealing with government agencies and public officials
 - (5) Politics
3. Relationship with antisocial groups and individuals
4. Behavior and responsibility as an individual and a company member
 - (1) Avoidance of conflicts of interests
 - (2) Assuming a job in another organization
 - (3) Personal investment
 - (4) Workplace environment
 - (5) Political and religious activities
 - (6) Accurate reporting and recording
 - (7) Honest and reliable performance
5. Protection of company assets and business information
 - (1) Protection of tangible and intangible assets of the company
 - (2) Obligation to return company assets when leaving the company
 - (3) Confidentiality of information
 - (4) Protecting and respecting other companies' rights
 - (5) Government agencies
 - (6) Managing computer data
6. Compliance
 - (1) Compliance with relevant laws and regulations
 - (2) Insider information
 - (3) Compliance regarding international transaction
 - (4) Intellectual property

Chapter 2

Implementation System

1. Nikon Business Conduct Committee
2. Responsibilities of section leaders

Chapter 3

Inquiry Services and Contacts

Chapter 4

Misconduct and Legislative Action

1. Misconduct
2. Legislative action

Nikon Charter of Corporate Behavior

1. Healthy corporate activity

The Nikon Group endeavors to obey related laws, regulations and in-house rules, which are supported by the exercise of fair and ethical business practices and by the use of good judgment, in order to gain trust from customers, shareholders, employees, business partners and society.

2. Responsibility to society as a corporate citizen

As a corporate citizen that is responsible for the future of the region, the nation, and the world, the Nikon Group endeavors to promote business activities that take into account human rights protections, improved welfare and the protection of environmental and natural resources, among others, to contribute to the healthy development of society.

3. Protection of the natural environment

Environmental conservation is a growing concern worldwide, and individuals and corporations are directly responsible for conserving the environment. The Nikon Group also strives to protect the natural environment.

4. Provision of useful goods and services for society

An important reason for the Nikon Group's existence is to contribute to the development of society and the economy through our business activities, including the production of high quality products and the provision of excellent services.

5. Transparent operating activities

The Nikon Group constantly strives to ensure that our operating activities are fair and transparent, and in accordance with local social norms.

6. Protection of human rights

Many people with diverse backgrounds work within the Nikon Group. The Nikon Group pays careful attention to respecting individual human rights and to treating people with respect, so that each individual can concentrate on working and producing good results without fear of discrimination.

7. Provision of a healthy and safe workplace

Ensuring our employees' health and safety is a fundamental principle underlying proactive business development and the success of our employees in their individual lives. The Nikon Group endeavors to obey related laws, regulations, and in-house rules to ensure healthy and safe workplaces for all of our employees.

8. Development and utilization of human resources

The Nikon Group aims to be a self-sustained professional group where employees are able to develop new knowledge for their jobs as the workplace changes. To attain this aim, the Nikon Group provides sound and flexible workplaces in order to adapt as our business activities expand throughout the world.

9. Fair employment opportunity

The Nikon Group employs people with excellent skills and experience regardless of their nationality and gender, and their achievements are based on a merit policy.

10. Accurate public relations

The Nikon Group makes timely and accurate disclosure of corporate information for better communication with its stakeholders and society.

11. Responsibility of top management

Top management and employees in managerial positions within each of the Nikon Group's business divisions must understand that they play an essential role in realizing the spirit of the Charter of Corporate Behavior, and thus, in addition to leading by example, promise to develop the internal infrastructure to ensure that the Charter of Corporate Behavior is disseminated to everyone concerned.

When any incident occurs that may violate the Charter of Corporate Behavior, top management will take immediate corrective measures to find the cause and prevent its recurrence, and will deal severely with all people involved in the matter, including top management itself where appropriate.

Compliance Section and CSR Section Activities

The Compliance Section provides training and education to encourage compliance awareness among all Nikon Group employees. To deepen this awareness, it also uses the case method focusing on the environment, information security and other issues related to CSR.

Furthermore, through this report the CSR Section aims to foster communication with stakeholders by offering a comprehensive introduction to the Nikon Group's CSR efforts. It is hoped that stakeholders will provide their opinions and views so that they can be incorporated into future activities.

Compliance Training

A wide range of education and training programs have been introduced to promote understanding of the "Nikon Charter of Corporate Behavior" and "Nikon Code of Conduct" among all employees. Training for top management is provided by outside instructors, while training for management level employees in the Nikon Group is conducted by Compliance Section staff members. Original training programs developed by the Compliance Section offer an outline explanation of CSR and compliance and involve group discussions of case studies and other activities. For extra flexibility, e-learning is also employed to verify understanding of the "Nikon Code of Conduct" among both employees and directors.

Study Groups in which the Compliance Section Participates

Target	Training program	Time
Nikon managers	Group training + case method	3 hours
Promoted Nikon managers	Group training + case method	2 hours
Nikon recruits	Group training	1 hour
Nikon Group managers	Group training + case method	3 hours

Introduction of the "Code of Conduct Coordinator System"

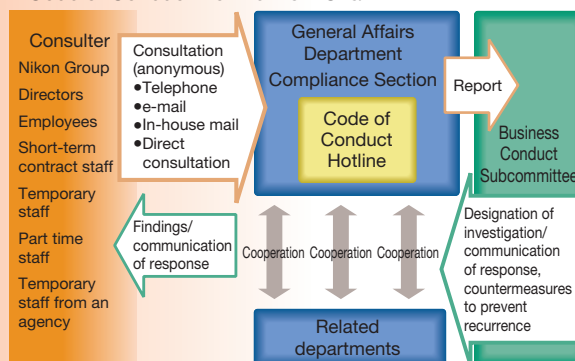
Due to the significant constraints of time and location that dictate when Nikon Group employees can receive training, in addition to implementation of training, the Compliance Section has introduced a "Code of Conduct Coordinator System" to enable independent training at separate departments. In this system, the head of a department or a nominated individual acts as a coordinator to vigorously promote compliance within that department. Coordinator orientation and training documents are provided by the Compliance Section.

Code of Conduct Hotline

Nikon established the "Code of Conduct Hotline" to provide consultation in the event of a situation arising that runs counter to the "Nikon Code of Conduct". Handled by the Compliance Section, the consultations are conducted without revealing names and personal information to strictly protect the privacy of the individual seeking consultation and avoid any adverse impact on human affairs or the way he or she is treated. When necessary, consultations are dealt with by the Business Conduct Subcommittee.

Reports concerning the Whistleblower Protection Act enforced in April 2006 are also handled by the "Code of Conduct Hotline".

Code of Conduct Hotline Flow Chart



Compliance Perception Monitoring

During October, which was selected as Compliance Enhancement Month to coincide with the Business Ethics Month of the Japan Business Federation, awareness of business ethics is reviewed and employees are assessed to ascertain their degree of understanding of the "Nikon Code of Conduct". At the same time, awareness of the "Code of Conduct Hotline" is also enhanced. The results of these evaluations are made available on the Group intranet, and educational activities are implemented through compliance training and code of conduct coordinators to assure improvements where necessary at all times.

Nikon Code of Conduct Questionnaire Results

