

External and Internal Evaluation

Nikon Corporation's response to comments made by Ms. Edahiro and Mr. Fujii in its previous CSR report

	Comments in CSR REPORT 2010	Nikon's response
Ms. Junko Edahiro	In addition to discussing systems and plans, please also disclose information on the specific results of measures and future policies and activities.	We created highlights pages for each priority issues and report on the details of activities as examples of specific undertakings. We also made additional efforts to disclose information concerning future activities.
	Please report priority issues to the world and society with the proper stress, maintaining the reporting structure easy to understand.	Each year, the CSR Committee identifies priority issues that should be addressed and makes determinations based on expectations from stakeholders and societal trends, and this process was described in the current report as well. Eight priority topics were selected for the fiscal year ended March 2011, but they will be consolidated into five topics for the fiscal year ending March 2012, and we will engage in vigorous activities.
	It is essential that you disclose information on current awareness within the company as well as analysis of causes and countermeasures concerning global warming, one of the most important issues today. Also, the report is expected to play a role in communicating the company's major courses of action. Please set medium- and long-term targets concerning global warming without being unnecessarily influenced by political developments.	We are aware that reducing carbon dioxide emissions is a key management issue. We have established systems for encouraging carbon dioxide reductions by individual business divisions, and following clarification of our direction in a three-year plan concerning the environment (Environmental Action Plan; see pp. 33-34) based on our medium-term business plan, we set specific targets and take action each year. We also disclosed targets and results at major overseas manufacturing bases. We have set long-term internal targets concerning carbon dioxide emissions reductions, but because there are many uncertain factors, we are unable to disclose these targets as figures for which we can be liable.
	Please build stronger relations with suppliers, local residents, NGOs, and other stakeholders.	We engage in dialogues with stakeholders through our day-to-day activities, but this may not have been clear in the 2010 report. In this year's report, we created a page to more clearly discuss methods of dialogue.
Mr. Toshihiko Fujii*	The Group needs to further advance its socially responsible human resource-related policy. The targets set for many of its diversity, human rights and labor environment issues are generally vague and thus are difficult to evaluate. In terms of the global activities, I would like the company to disclose not only domestic data, but also overseas data.	We are aware of the importance of measures concerning people. In the year ended March 2011, we conducted large-scale, group-wide training concerning human rights and worked to improve awareness. We will continue to periodically conduct group monitoring to ascertain the situation within the group and will make additional efforts to disclose overseas data. We recognize that our goal-setting remains ambiguous and requires further improvement.
	As regards to socially responsible procurement, progress on the social front seems rather slow. It is crucial to know the current situations of suppliers and urge them to make improvements where necessary.	We work to understand the current situation of procurement partners by collecting from them self-assessment results of CSR survey forms. This measure was expanded to overseas suppliers in the year ended March 2011. We held briefing sessions for procurement partners to explain our positions and took measures to encourage CSR activities in cooperation with them. When necessary, we request that procurement partners make improvements.
	Regarding environmental measures, I would like to see the Nikon Group clearly separate its efforts to ensure legal compliance from its voluntary environmental measures and provide accurate information. Also, some data concerns only operations in Japan, this should be improved.	With regard to measures concerning products, we make group-wide efforts fundamentally intended to comply with all laws and regulations applicable to our products throughout the world including the RoHS Directive and the REACH Regulation. We are aware that disclosing accurate and easy to understand information in reports remains an issue for the future, and we are working to make improvements. We have started disclosing data from some Group manufacturing companies in Asia, and we are taking measures to expand the scope of disclosure to include data from other overseas Group companies in the future.

* Main comments

Results of the Nikon CSR REPORT 2010 Reader Survey (respondents were Nikon Group employees including overseas employees)

Employee opinions	Measures taken in the Nikon CSR REPORT 2011
The criteria to determine priority issue and the goals to be achieved are not clear.	The CSR Committee reviewed the materiality map and priority issue by making reference to international guidance/guidelines including ISO 26000.
The detailed version contains a lot of information and is difficult to understand, but I found that the digest version was more comprehensible. CSR related terminology can be difficult to understand, so a glossary is essential.	For each version, we set target readers, and the number of pages was determined accordingly; the detailed is for CSR experts and the digest is for employees and general readers.
The CSR activities of overseas group activities show differences in cultures, and I find this extremely interesting. Please don't limit this information to just two companies and present a broad range of activities.	We conducted a survey of overseas group companies and gather information on the CSR activities of each company. We selected unique activities by four companies and introduced them in the report.
From the perspective of overseas employees, it is culturally difficult to understand the activities for gender diversity which is conducted in Japan.	We have initiated an internal investigation so that we can make improvements concerning this issue in the future.

Previous report sections in which readers were particularly interested (top three)	Sections which readers felt difficult to read (top three)	Nikon's response
1. CSR Activities at Manufacturing Bases Outside Japan	1. CSR Achievements for the Year Ended March 31, 2010, and Future Targets	We have selected the number of topics under CSR Achievements for the Year Ended March 31, 2010, and Future Targets and have endeavored to make the text more comprehensible.
2. Business Activities and CSR	2. Environmental Management	With regard to Environmental Data, highly technical data is disclosed on the website, and only key data is included in the PDF detailed version.
3. Product-related Activities	3. Environmental Data	