

The Nikon Group emphasizes CSR-oriented management in its business conduct, in the belief that the proper conduct of corporate social responsibility (CSR) will allow us to realize our corporate philosophy of “Trustworthiness and Creativity.”

The CSR Medium Term Plan

The Nikon Group has actively promoted the concept of CSR since 2006, when “CSR-oriented management” was adopted as a goal of its Medium Term Management Plan. Since then, Nikon has implemented a number of measures to achieve this goal, including the establishment of the CSR Committee, formulation of the Nikon CSR Charter, development of a medium-term plan for CSR and participation in the United Nations Global Compact initiative.

From the fiscal year ending March 2012, we have reorganized the eight high-priority issues in the medium term plan for CSR into five priorities common to the entire Nikon Group: 1) Expansion and promotion of environmental management; 2) Implementation of compliance activities; 3) Compliance with human rights and labor practices, and promotion of varied activities for employee achievement; 4) Coexistence with society and the natural environment; and 5) Promotion of CSR activities in the supply chain. We have developed a medium term plan based on these priorities, and will implement measures to achieve them. Nikon will deploy its CSR-oriented business activities globally in order to meet the expectations of stakeholders, and to be sincerely deserving of their trust.

CSR Structure

We have established a CSR Committee, which is headed by the Chairman of the Board. This committee determines and promotes CSR policies, and monitors CSR activities. The CSR Committee oversees seven specific subcommittees, including the Business Conduct, Environmental and Social Contribution committees, which are responsible for facilitating the spread and establishment of CSR measures throughout the Nikon Group.

In the fiscal year ended March 2011, Nikon made preparations for the comprehensive promotion of CSR in Nikon Holdings Hong Kong Limited, established in August 2010. During the fiscal year ending March 2012, we will strengthen structure to promote CSR at Group companies in the China and Hong Kong region.

Business Conduct (Compliance)

Maintaining strict compliance with legal regulations while carrying out business activities is a matter of fundamental importance to the Nikon Group. As a global company, we are expected to achieve a particularly high level of awareness of compliance issues, not only in Japan but also in other countries where cultural differences must be taken into account. In April 2011, Nikon revised the Nikon Code of Conduct, which establishes the proper standards of behavior that all employees should observe in the conduct of their everyday

business activities, thus creating a consistent version applicable both in Japan and overseas. Further, in accordance with Group policies regarding compliance established by the Nikon Business Conduct Committee, Nikon's Compliance Section conducts a wide range of educational and awareness training activities in cooperation with the persons in charge of promoting compliance assigned within the Company and at Group companies.

Risk Management

To ensure the sustainable development of the Nikon Group, we have established a Risk Management Committee to carry out comprehensive risk management and to counter risks that could have a major impact on business performance. The committee identifies risks, formulates countermeasures against those risks, implements a range of measures to minimize the damage that could be caused if a risk materializes, performs constant monitoring and manages the risks by implementing a PDCA cycle. At present, the committee is also working on information security management of risks for employees assigned overseas, and measures against pandemic influenza.

The Nikon Group regards it as part of its social responsibility to ensure business continuity, even in the event of a natural disaster or other contingencies, and has established an Integrated Disaster Prevention and BCM Committee to deal with risks associated with major earthquakes and fires. We are also taking steps to construct BCM systems at our overseas manufacturing centers, and are developing Business Continuity Plans (BCPs) to cover all of our major business operations. Drawing on the experience gained from the Great East Japan Earthquake, we will revise our BCPs and will conduct more thorough education and training to enhance our risk management capabilities.

Environmental Conservation

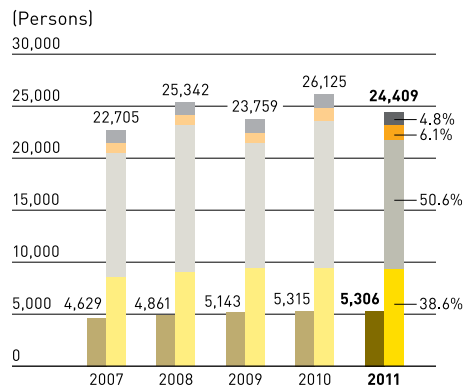
The Nikon Group formulated its Nikon Basic Environmental Management Policy in 1992, and enacted a major revision in 2002. This policy is designed to help the Group achieve its goal of becoming an environmentally friendly company able to achieve business growth while preserving the environment. A further revision was implemented in April 2010 to clarify Nikon's basic stance on environmental issues such as climate change and preservation of biodiversity. Based on these policies, the Environmental Committee, which is overseen by the CSR Committee, has developed a three-year plan called the Nikon Environmental Action Plan, and has established environmental targets that are being implemented throughout the Group.

Promoting Diversity Activity

As a basic principle, we respect the diversity and human rights of employees with different backgrounds and treat them fairly, so that each of them can apply themselves to their work, display their abilities and produce results as a team. Nikon is also making preferential efforts to promote achievement for women in Japan, and to support the disabled.

Number of Employees by Region

Years ended March 31

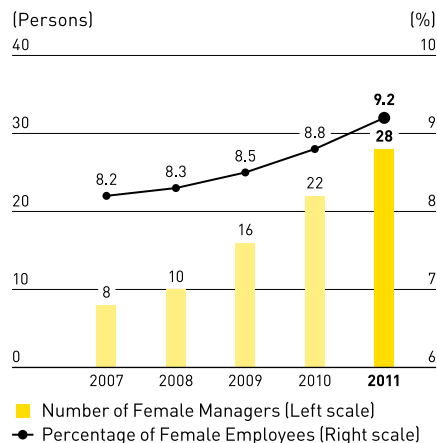


Non-consolidated: ■
Consolidated: ■ Japan ■ Asia and Oceania ■ Europe ■ North America

Note: Consolidated figures include permanent and non-regular staff in the Nikon Group. For regional percentages, employees of Nikon Corporation who are temporarily dispatched to Group companies are included in the region to which they are dispatched, while employees dispatched to non-consolidated companies are not included. Employees of Nikon Metrology NV and its subsidiary Group companies are included in the European figures.

Percentage of Female Employees and Number of Female Managers at Nikon Corporation

Years ended March 31



Note: Figures include permanent and non-regular staff at Nikon Corporation. The number of female managers refers to those at the level of section chief or higher.

External Evaluation

Major awards received in the fiscal year ended March 2011

- April 2010 Nikon CSR Report 2009 recognized as Good Practice by UN Global Compact Japan Network
- May 2010 Nikon Imaging (China) Co., Ltd. recognized as "Excellent Company for CSR in WND (Wuxi New District)" by the Wuxi New District Administrative Committee for the second consecutive year
- June 2010 Nikon's Sagami-hara Plant and Sendai Nikon Corporation awarded the Minister's awards from Japan's Minister of Health, Labour and Welfare
- July 2010 Received the highest ranking in the digital camera category of the "2010 After-sale Service Satisfaction Ranking" in *Nikkei Business* magazine
- August 2010 Nikon CSR Report 2009 received Notable Status on Communication on Progress (Notable COP) by UN Global Compact for the second consecutive year
- October 2010 Ranked eighth in the Nippon Foundation's selection of 100 admirable CSR-oriented Japanese companies
- November 2010 Nikon Salon awarded grand prize at the Mecenat Awards 2010

SRI Index Listings (As of March 31, 2011)

Nikon has been included in the FTSE4Good Japan Index in recognition of its commitment to CSR since 2004. In September 2010, Nikon was also selected as a component stock in the Morningstar Socially Responsible Investment Index (MS-SRI).



For more information on the Nikon Group's corporate governance and CSR activities, please visit www.nikon.com/about/csr/.
For Nikon's most recent CSR report, please go to www.nikon.com/about/csr/report/.