



NIKON CORPORATION

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February 25, 2020

To: Business and Human Rights Resource Centre

Re: Response to your concern about our products

Thank you for awaiting our response to your concerns, as cited in your mail of 10 February, 2020.

Nikon respects the results of the report on “The economic interest of the Myanmar military”, as conducted by the United Nations Independent International Fact-Finding Mission on Myanmar.

Respect for human rights is an absolutely central corporate responsibility and forms the basis of Nikon’s corporate philosophy of “Trustworthiness and Creativity”. As a core principle, Nikon neither infringes upon human rights nor contributes to the infringement by others through our business operations, products or services.

We are committed to respecting human rights as set out in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and support the ten principles of the United Nations Global Compact. We also support the United Nations Guiding Principles on Business and Human Rights and strive to operate in line with them. Our approach to respecting human rights is outlined in the Nikon Human Rights Policy, launched in April 2019, and we are consistently addressing emerging issues based on our risk assessment.

Furthermore, Nikon is implementing measures related to security export controls, with the aim of maintaining international peace and security. Based on international export controls regimes, we conduct strict internal procedures before exporting goods or providing technology, in order to prevent our products or technology from being exploited for the development, manufacturing or usage of arms/weapons which would be a threat to international society. In addition to regular checking procedures to monitor concerns related to the end-user or purpose

of use, we have an internal escalation process to judge the possibility of export (or provision of technology) if the case meets a set of internal criteria (e.g. end-user is a military or military-related organization). In addition, we promote communication with the relevant government authority, such as a pre-shipment consultation, and export our goods (or provide our technology) in compliance with the laws and regulations, including acquiring an export license from the relevant authority if necessary.

Nikon has reviewed its internal records with regard to the case to which your inquiry relates, and as set out by the United Nations Independent International Fact-Finding Mission on Myanmar. We did not identify any records indicating that our digital cameras (model D7100) were shipped directly to Tatmadaw or its related companies. We also note that the above digital camera is a consumer electronics product and is available for civilian purchase in-market.

The UN report highlights the human rights issues faced in Myanmar, and as such, we will redouble our efforts to enhance our human rights due-diligence procedures, as well as measures for security export control to ensure that Nikon neither causes nor contributes to human rights violations of any kind.

Sincerely yours,

CSR Department
Nikon Corporation