



# RESPONSIBLE MINERALS SOURCING REPORT 2025

Results of 2024 Survey

## Responding to the Issues of Responsible Minerals Sourcing

Since 2011, with its established Policy on Conflict Minerals declaring that we do not use 3TG (tantalum, tin, tungsten and gold) intermediated by armed groups in the Democratic Republic of the Congo and its neighboring countries, the Nikon Group has conducted country-of-origin surveys and due diligence every year and disclosed the results. In 2020, in response to the concept behind the EU Conflict Minerals Regulation, which does not place limitations on the target risks, minerals, or regions, we changed the name of this report to the Responsible Minerals Sourcing Report and began more comprehensive efforts to source minerals responsibly. To achieve this goal, we have requested procurement partners to agree on the Nikon Group's Responsible Minerals Sourcing Policy and pledge to cooperate with our surveys on the contract. This policy can be viewed on the Nikon Group's website.

Responsible Minerals Sourcing Policy

[https://www.nikon.com/company/corporate/procurement/conflict\\_minerals/](https://www.nikon.com/company/corporate/procurement/conflict_minerals/)

The Nikon Group's Responsible Minerals Sourcing (Conflict Minerals) Report is structured based on a five-step framework for due diligence according to risks in the mineral supply chain defined in Annex II of "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" Third Edition.\*<sup>1</sup> It is important to note that because the Nikon Group is downstream in the supply chain and does not directly purchase minerals from smelters. The results in this report are based on information provided by our primary procurement partners that can be believed to be true.

\*<sup>1</sup> OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" Third Edition

[https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas\\_9789264252479-en.html](https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en.html)

# Implementation of Due Diligence



# 1. Establish Strong Company Management Systems

## Strengthening Supply Chain Management

In 2019 we introduced the database system to strengthen supply chain management across the entire Nikon Group. This system enabled us to manage second-tier and third-tier suppliers. Until now, we have requested suppliers to respond to responsible minerals sourcing as part of CSR procurement activities, and the status of responses to responsible minerals sourcing surveys and of due diligence of each company can now be managed as part of supplier selection and evaluation using the internal database.

## CSR Procurement Standards

Through the Nikon Group Code of Conduct (revised April 1, 2024), the Nikon Group has made a commitment to all stakeholders about the social responsibilities of the Group both internally and externally. At the same time, we ask our procurement partners to comply with the Nikon Group CSR Procurement Standards, which we formulated in August 2015 based on the "Social Responsibility in the Supply Chain" section in the Nikon Group Code of Conduct, and made the 2nd Edition in September 2024, to promote the Nikon Group's approach towards CSR in the supply chain. These standards are in line with the code of conduct of the RBA<sup>\*2</sup>, a global standard in the electronics industry, and we ask that our procurement partners adhere to these standards not only for responsible minerals sourcing but as basic standards for all CSR practices.

<sup>\*2</sup> The Responsible Business Alliance. The RBA is an industry organization that includes not only the electronics industry but also other industries that purchase electronic components, such as the automobile, toy, and aerospace industries. The RBA Code of Conduct establishes standards to ensure that working conditions in the supply chains of these industries are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

## Nikon Group CSR Procurement Standards

[https://www.jp.nikon.com/company/corporate/procurement/pdf/csr-procurement2\\_e.pdf](https://www.jp.nikon.com/company/corporate/procurement/pdf/csr-procurement2_e.pdf)



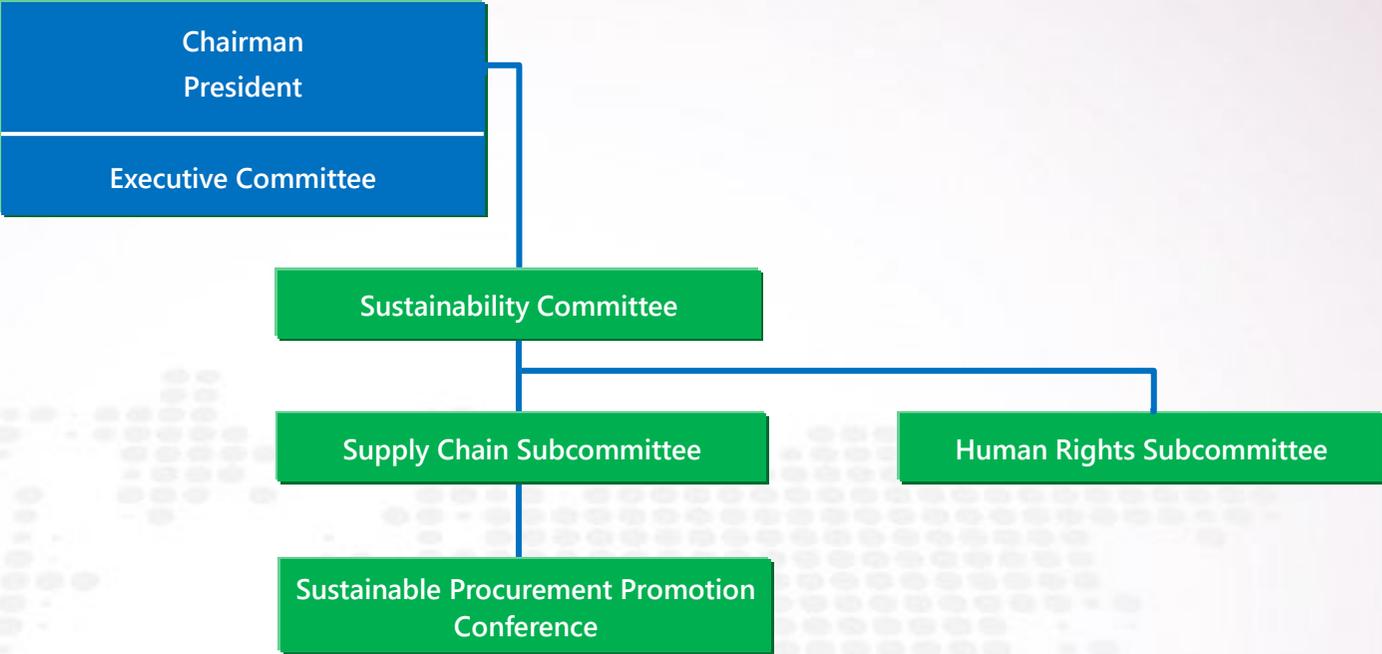
## Internal Promotion System

Based on our Policy on Conflict Minerals, in 2013 we formed a cross-departmental project team led by a company director. Since 2014, we have also maintained a Supply Chain Subcommittee to deliberate concerns involving the whole supply chain and decide actions from a cross-organizational standpoint. Decision-making and approval authority rests with this Subcommittee, which is chaired by the executive in charge of the procurement department and includes department managers or higher in related departments as its members. The Supply Chain Subcommittee meetings are held twice every year. Significant matters of the responsible mineral sourcing are reported to the directors, officers and general managers at the Sustainability Committee after they are approved by the Supply Chain Subcommittee. In order to facilitate deliberation and decision-making on matters covered by the Supply Chain Subcommittee, a Sustainable Procurement Promotion Conference of section managers etc. from related departments was formed under the Supply Chain Subcommittee. This Conference will act as a task force promoting all aspects of CSR procurement, including responsible minerals sourcing. Additionally, we have newly established the Human Rights Subcommittee under the Sustainability Committee to strengthen our initiatives on human rights material issues in 2025. The Human Rights Subcommittee will review progress and measures for priority issues, human rights due diligence, grievance, and engagement on both mid-term and annual bases. The activities will be reported to the Board of Directors for necessary guidance after deliberation and reporting at the Management Committee through the Sustainability Committee. This new organizational structure will enable more effective promotion of human rights initiatives throughout the company.



STEP 1

### Responsible Minerals Sourcing Promotion System



STEP 1

### Clarification and Documentation of Roles, Responsibilities, and Operations

The Nikon Group has put in place the Basic Conflict Minerals Rules as a basic policy for the purpose of clarifying the roles, responsibilities, and operations of related members, and the Conflict Minerals Response Manual that includes more detailed information on continuous responsible minerals sourcing activities.

### Responsible Minerals Sourcing Grievance System

The Nikon Group has established a Responsible Minerals Sourcing Hotline to which all stakeholders can report any acts contrary to or concerns about the Nikon Group's Responsible Minerals Sourcing Policy. To enhance the transparency, we are planning to replace this in-house Hotline and Inquiries (Procurement, CSR procurement, Green procurement) with a grievance system that involves independent third-party experts in the fiscal year 2025, so that we can properly investigate the grievance and take corrective actions.

Responsible Minerals Sourcing Hotline

<https://www.nikon.com/company/sustainability/society-labor/supply-chain/form/>

Inquiries (Procurement, CSR procurement, Green procurement)

<https://www.nikon.com/company/corporate/procurement/form/>



## 2. Identify and Assess Risks in the Supply Chain

### Responding to High-Risk Conflict Minerals

3TG (Tin, tantalum, tungsten, gold) and cobalt are high-risk minerals distributed through our global supply chain from various countries and regions. In cooperation with procurement partners, Nikon continues to initiatives to improve supply chain transparency and reduce risk.

### Five Mineral Usage Survey and Results

We conduct a Nikon Group survey on the use of the five minerals as follows.

1. Identify Nikon Group products manufactured or commissioned to be manufactured in each business unit for the year covered by the survey
2. Request procurement partners handling products subject to the survey to conduct their own survey of country of origin and smelters related to the targeted minerals (3TG/Cobalt) using the industry standard Responsible Minerals Initiative: RMI<sup>\*3</sup>'s Reporting Template (CMRT/EMRT)).
3. Compare smelter information collected from procurement partners against the the Facility Database available for RMI members. We verify RMAP<sup>\*4</sup> eligibility, RMAP audit status, RMI's comments about due diligence actions required for each smelter.
4. Regarding RMAP not listed as conformant 3TG smelters, we checked whether the locations of the mines were in the Democratic Republic of the Congo and its nine neighboring countries (Dodd-Frank Act covered countries) or in the EU's Conflict-Affected and High-Risk Areas (CAHRAs<sup>\*5</sup>) listed countries (<https://www.cahraslist.net/>).

Regarding RMAP not listed as conformant Cobalt refiners, we checked whether the locations of the mines were in the CAHRAs defined by Dodd Frank Act or EU's CAHRA list.

<sup>\*3</sup> RMI: Responsible Minerals Initiative. Founded in 2008 by members of the Responsible Business Alliance and the Global Sustainability Initiative, the RMI is one of the most utilized and respected resources for companies from a range of industries addressing responsible mineral sourcing issues in their supply chains.

<sup>\*4</sup> RMAP: Responsible Minerals Assurance Process, auditing program for smelters/refineries run by the RMI.

<sup>\*5</sup> CAHRAs: Conflict-Affected and High-Risk Areas. Areas where there is political unrest or the domestic infrastructure has collapsed. In these areas, there are widespread violations of human rights and domestic and international laws.



STEP 2

### 3. Design and Implement a Strategy to Respond to Identified Risks

We have defined following criteria for the risk identified in the survey responses. Based on the risk rating, we work together with our procurement partners to take corresponding actions to mitigate the risks.

**Risk level 1: The suppliers reported no smelter information (including CMRT/EMRT rejected, or smelter information not disclosed/unknown.)**

Action 1: We ask the suppliers if they are willing to respond to our survey. We don't deal with the suppliers who are not willing. If they are willing but encounter any issues, we assist them resolve the issues.

**Risk level 2: The smelters were not eligible for RMAP audit because they were confirmed by RMI to be no longer in operation or not smelters.**

Action 2: We ask the suppliers to verify the current eligible smelters.

**Risk level 3: The smelters were RMAP Not listed as Conformant.**

Action 3: We ask the suppliers to provide their due diligence plans. Also we request the smelters directly or indirectly to participate in RMAP unless RMI cannot proceed with RMAP.

Priority 1: Mine location unknown

Priority 2: Mine located in Covered countries of US Dodd-Frank Act and CAHRAs by EU regulation

Priority 3: Mine located in Low-risk countries

**Risk level 4: The smelters were "Active" in the RMAP audit.**

Action 4: We monitor the status and make sure the smelters become RMAP conformant.

**Risk level 5: The smelters were RMAP Conformant.**

Action 5: We monitor the status and make sure the smelters renew the conformant status before it expires.



STEP 3

## 4. Carry Out Independent Third-Party Audit of Smelter/Refiner's Due Diligence Practices

One of the essential steps in promoting responsible minerals sourcing is to increase the number of smelters around the world that are confirmed as having no connection with armed groups. To actualize this, we joined the Responsible Minerals Initiative (RMI) in April 2014. As a member of RMI, we made use of the available information regarding independent third-party audit of smelters and refiners, and request the applicable smelters and refiners to participate the RMAP audits.

In addition to the RMI's initiatives, we participated in the "Responsible Minerals Trade Working Group" established by the Japan Electronics and Information Technology Industries Association (JEITA) in November 2012, to collect mineral supply chain information, and we continue to engage in industry group activities. We assumed the role of Deputy Leader for the Awareness and Public Relations Team starting in 2024 and we have been collaborating with domestic and international industry associations to advance industry-wide initiatives by organizing seminars on responsible mineral sourcing practices, conducting survey briefing sessions, and etc.

In 2018, the Nikon Group joined the Responsible Business Alliance (RBA), an industry association formed from companies in the electronics and electrical machinery industry in the U.S. and Europe. Through this, we aim to further promote issues relating to CSR in general including responsible minerals sourcing and cooperate with member companies in progressing with activities toward resolving these issues.

JEITA (Japan Electronics and Information Technology Industries Association)

Responsible Minerals Trade Working Group

[https://home.jeita.or.jp/mineral/eng/index\\_e.html](https://home.jeita.or.jp/mineral/eng/index_e.html)

RMI (Responsible Minerals Initiative)

<https://www.responsiblemineralsinitiative.org/>

RBA (Responsible Business Alliance)

<https://www.responsiblebusiness.org/>



## 5. Report on Supply Chain Due Diligence

Nikon reports the progress and status of its conflict minerals management program, and other responsible mineral sourcing activity, annually in Responsible Minerals Sourcing Report (this report) on Nikon's official website.

<https://www.nikon.com/company/sustainability/society-labor/supply-chain/>

### **Awareness of Survey Policy and Methods**

In November 2024, we held a sustainable procurement seminar for procurement partners (1,180 participants) and explained the purpose and benefits of engaging in responsible mineral sourcing, as well as the current social situation. We also explained the risks associated with not listed as conformant under the Responsible Minerals Assurance Process (RMAP), and requested cooperation in mitigating these risks. Furthermore, we provided an overview of Nikon's initiatives and emphasized the importance of adhering to Nikon's responsible mineral sourcing policy.

### **Reasonable Country of Origin Surveys**

#### **3TG (Tantalum, Tin, Tungsten, and Gold)**

We sent survey requests to 704 primary procurement partners from all business units in September 2024 and received the completed CMRT by January 2025 from 608 partners (86.4%).

#### **Cobalt**

We sent survey requests to 58 primary procurement partners from all business units in September 2024 and received the completed EMRT by January 2025 from 53 partners (91.4%).

### **Risk Assessment**

#### **3TG (Tantalum, Tin, Tungsten, and Gold) Risk Assessment**

We used the RMI's Facility Database to verify the RMAP audit status and conformant status of each SOR reported by our procurement partners. 325 SORs were found not eligible for the RMAP audit, because

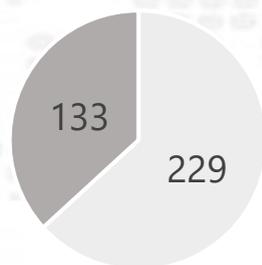


STEP 5

they were no longer in operation or found not to be SORs. 362 SORs were found eligible, of which 225 were conformant and 4 were active, resulting in a conformant rate of 62%. Of the 133 not listed as conformant smelters, 2 SORs were in communication with RMI about RMAP. Out of 131 SORs, 22 were not qualified for the RMAP audit. So we sent letters directly or indirectly to 109 SORs to request them to participate in/accept the RMAP audit and we requested our procurement partners to present their due diligence plans with the survey reply.

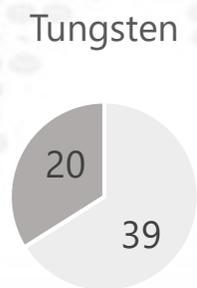
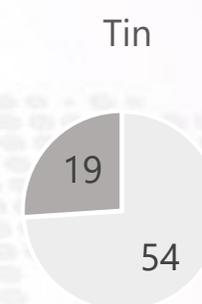
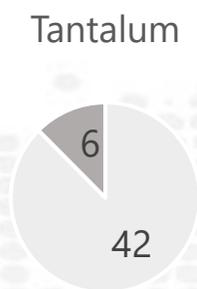
• 3TG Risk Assessment

Total Numbers of SORs:



- Conformant or Active SORs
- Not listed as Conformant SORs

Numbers of SORs by minerals:



- Conformant or Active SORs
- Not listed as Conformant SORs



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• 3TG Due Diligence Action and Number of SORs by Risk Level (as of 31 January 2025)

| Risk Level | RMAP Audit Status   | RMAP Conformant Status                                       | Action   | Nr of SOR |
|------------|---|--|--|-----------|
| 1          | No SOR information reported<br>CMRT rejected<br>SOR disclosed/unknown | -  | Ask the suppliers if they are willing to respond to our survey. We don't deal with the suppliers who are not willing. If they are willing but encounter any issues, we assist them resolve the issues. | -         |
| 2          | Not Eligible<br>(No longer in operation or not SOR)                   | -  | Ask the suppliers to verify the current eligible SORs.   | 325       |
| 3          | Eligible<br>Not listed as Conformant (RMAP)                           | Not listed as Conformant (RMAP)<br>(1) Mine location unknown | Ask the suppliers to provide their due diligence plans. Also request the smelters directly or indirectly to participate in RMAP unless RMI cannot proceed with RMAP.                                   | 133       |
| 4          | Eligible<br>Active  | (2) Covered countries and CAHRAs<br>(3) Low-risk countries   | Monitor the status and make sure the smelters become RMAP conformant.  | 4         |
| 5          | Eligible<br>Conformant  | Conformant   | Monitor the status and make sure the smelters renew the conformant status before it expires.   | 225       |



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- 3TG Mine Locations of the 133 RMAP Not Listed as Conformant SORs Are as Follows:
  1. Mine location is unknown or undisclosed: 5
  2. Mine location is in the Democratic Republic of the Congo and its neighboring countries: 44  
(Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda, Zambia)
  3. Mine location is on the EU’s Conflict Affected and High-Risk Areas (CAHRAs) list: 97  
(Democratic Republic of the Congo, Burkina Faso, Burundi, Central African Republic, Colombia, Egypt, Eritrea, Ethiopia, India, Mali, Mozambique, Myanmar, Niger, Nigeria, Philippines, Sudan, Turkey, Zimbabwe)
  4. RMAP non-conformant SORs with mine location not in the Democratic Republic of the Congo and its nine neighboring countries or EU’s conflict affected and high-risk areas: 27
  
- 3TG Mine Location Risk of 3TG Not Listed as Conformant Smelters (as of 31 January 2025)

| Mine Location                          | Not listed as Conformant | Not listed as Conformant Active | Not listed as Conformant Not active |
|--|--------------------------|---------------------------------|-------------------------------------|
| Mine location unknown / undisclosed    | 5                        | 1                               | 4                                   |
| Covered countries of US Dodd-Frank Act | 44                       | 1                               | 43                                  |
| CAHRAs by EU regulation                | 97                       | 2                               | 95                                  |
| Low-risk countries                     | 27                       | 1                               | 26                                  |

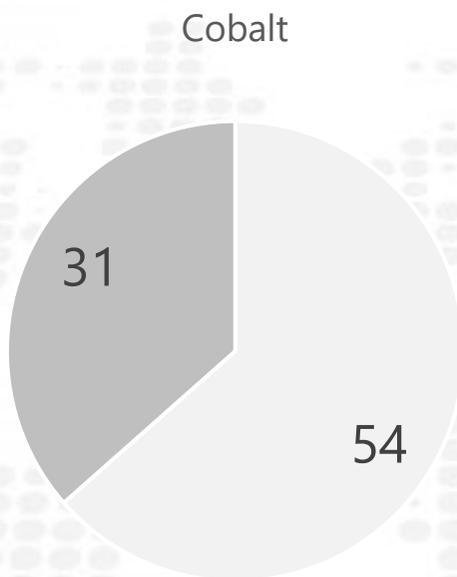


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### Cobalt Risk Assessment

We used the RMI's Facility Database to verify the RMAP audit status and conformant status of each SOR reported by our procurement partners. 8 SORs were found not eligible for RMAP audit because they were no longer in operation or found not to be SORs. 85 SORs were found eligible, of which 48 were conformant and 6 were actively participating in/accepting the RMAP audit, resulting in a conformant rate of 56%. Of the 31 not listed as conformant SORs, there're 7 SORs that RMI could not proceed RMAP. We sent letters directly or indirectly to 24 SORs to request them to participate in the RMAP audit.

- Cobalt Risk Assessment



- Conformant or Active SORs
- Not listed as Conformant SORs



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• Cobalt Due Diligence Action and Number of SORs by Risk Level (as of 31 January 2024)

| Risk Level | RMAP Audit Status   | RMAP Conformant Status                                     | Action   | Nr of SOR |
|------------|---|--|--|-----------|
| 1          | No SOR information reported<br>EMRT rejected<br>SOR disclosed/unknown |  | Ask the suppliers if they are willing to respond to our survey. We don't deal with the suppliers who are not willing. If they are willing but encounter any issues, we assist them resolve the issues. | -         |
| 2          | Not Eligible<br>(No longer in operation or not SOR)                   |  | Ask the suppliers to verify the current eligible SORs.   | 8         |
| 3          | Eligible<br>Not listed as Conformant                                  | Not listed as Conformant<br>(4) Mine location unknown      | Ask the suppliers to provide their due diligence plans. Also request the smelters directly or indirectly to participate in RMAP unless RMI cannot proceed with RMAP.                                   | 31        |
| 4          | Eligible<br>Active  | (5) Covered countries and CAHRAs<br>(6) Low-risk countries | Monitor the status and make sure the smelters become RMAP conformant.  | 6         |
| 5          | Eligible<br>Conformant  | Conformant   | Monitor the status and make sure the smelters renew the conformant status before it expires.   | 48        |



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- Cobalt Mine Locations of 31 RMAP Not Listed as Conformant SORs Are as Follows:
  1. Mine location is unknown or undisclosed: 1
  2. Mine location is in the Democratic Republic of the Congo and its neighboring countries: 15
  3. Mine location is on the EU’s Conflict Affected and High-Risk Areas (CAHRAs) list: 4
  4. RMAP non-conformant smelters with mine location not in the Democratic Republic of the Congo and its nine neighboring countries or EU’s conflict affected and high-risk areas: 19
  
- Cobalt Mine Location Risk of Not Listed as Conformant Refiners (as of 31 January 2024)

| Cobalt Mine Location                   | Not listed as Conformant | Not listed as Conformant Active | Not listed as Conformant Not active |
|--|--------------------------|---------------------------------|-------------------------------------|
| Mine location unknown / undisclosed    | 1                        | 0                               | 1                                   |
| Covered countries of US Dodd-Frank Act | 15                       | 0                               | 15                                  |
| CAHRAs by EU regulation                | 4                        | 0                               | 4                                   |
| Low risk countries                     | 19                       | 6                               | 13                                  |

- List of 3TG Smelters and Cobalt Refiners (Conformant and Active as of January 31, 2025) Identified by the 2024 Survey

[https://www.nikon.com/company/sustainability/society-labor/supply-chain/rmap\\_list.pdf](https://www.nikon.com/company/sustainability/society-labor/supply-chain/rmap_list.pdf)



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## Conclusion

In the 2024 surveys, we investigated whether sourcing of 3TG (tantalum, tin, tungsten, and gold) and cobalt could be a source of the risk of human rights violations, conflict, or social injustice not only in the Democratic Republic of the Congo and its neighboring countries but also in the areas on the Conflict Affected and High-Risk Areas (CAHRAs) list published by the EU. There were cases of responses not being received, smelter entry fields left blank, undisclosed entries, smelters not listed in the RMI reference smelter list, etc. Therefore, we cannot conclude that procurement partners provided sufficient information. As a result, within the scope of the 2024 surveys, we could not determine whether the target minerals contained in the surveyed products were a source of such risks, either directly or indirectly.

## Future Measures to Mitigate Risks

- We have increased the number of business units targeted for the cobalt survey every year. Now we have added FPD Lithography Business Unit to the cobalt survey in 2024 as scheduled. We conducted the cobalt survey on some products of 8 business units in total (the Digital Solutions Business Unit, the Industrial Metrology Business Unit, the Imaging Business Unit, the Glass Production Unit, Healthcare Unit, Semiconductor Lithography Business Unit, Customized Products Business Unit, and FPD Lithography Business Unit (newly added)). We will conduct continuous investigations, plan to verify the effectiveness of due diligence in our Human Rights Subcommittee, and make improvements as needed.
- By promoting the reuse and recycling of Nikon products, we will totally reduce the risk of sourcing/using newly mined minerals.
  - (1) Refurbishing and selling used lithography equipment and refurbishing projection lenses: In the Nikon Group, we have commercialized the service of reclaiming no-longer-used semiconductor lithography equipment manufactured by Nikon from customers and performing recycling, parts replacement, adjustment, and installation for new customers in Japan and other countries. We are also working on extending the service life of lithography equipment by refurbishing or replacing projection lenses that are no longer able to maintain basic exposure performance due to deterioration from long term use at customer sites using Nikon's latest technologies.



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- (2) Battery recycling: In the Japanese market, Nikon recycles the collected rechargeable batteries used in digital cameras and other products.
- (3) In the Nikon Group, we are promoting efforts to fulfill our obligation to collect and recycle Nikon products including digital cameras. We perform assessments at the product design phase to promote easy-to-disassemble designs, a reduction in the types of raw materials used, and active utilization of recycled resources. To date, we have registered to participate in collection organizations in more than 30 countries, and have established recycling systems in each country. Furthermore, as an initiative to promote the reuse of digital cameras collected from customers, we perform repairing and maintenance on them and sell them as refurbished products.

### Nikon Sustainability Report 2024

[https://www.nikon.com/company/sustainability/report/2024/sr2024\\_all.pdf](https://www.nikon.com/company/sustainability/report/2024/sr2024_all.pdf)



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## Activities Contributing to the DRC and Its Adjoining Countries

Starting from 2023, the Nikon Group has been consistently donating to the resilience improvement project conducted by the Certified Nonprofit Organization Terra Renaissance to support the people of the Democratic Republic of Congo, where human rights abuses related to minerals have become a significant issue. Our donation have supported various initiatives, including dressmaking skill training programs (benefiting 184 individuals) and beekeeping production support (aiding 148 individuals). These programs help women affected by conflict and reduce the risk of the most impoverished populations and youth being forced into armed groups or conflict mineral-related businesses. Beyond one-time charitable donation, the Nikon Group is committed to raise awareness about the importance of “responsible mineral sourcing” and current challenges in the region. As part of this commitment, we invited the Certified Nonprofit Organization Terra Renaissance’s representative to our corporate headquarter to conduct the seminar for middle and high school students from the neighboring school and our employees. We sincerely hope that our activities and donations will be meaningful for people in the Democratic Republic of Congo. The Nikon Group will continue to collaborate with the Certified Nonprofit Organization Terra Renaissance in our ongoing efforts to create a better world.

## Compliance With the UK Modern Slavery Act

The Nikon Group strives to identify and mitigate human rights risks throughout its supply chain. As part of these efforts, we conduct conflict minerals survey annually and promote initiatives. Our commitment is also clearly stated in the Nikon Group Slavery and Human Trafficking Statement.

**Link to Nikon Corporation Slavery and Human Trafficking Statement**

<https://www.nikon.com/company/sustainability/society-labor/human-rights/>