



NIDEK CO., LTD.

# ESG Report 2021

## Editorial Policy

NIDEK continues to conduct our “Eye & Health Care” business globally while always being true to our core values and we observe the letter and spirit of all laws and regulations in Japan and abroad, and act with a strong sense of ethics and fairness to contribute to the development of a sustainable world society.

This report aims to inform those interested of our environmental and social activities of fiscal year 2020.

## Profile

### Basic Information

Covered Organization	NIDEK COMPANY LIMITED - Headquarter (Hiroishi Plant) - Hamacho Plant - Tsurugahama Plant - Higashihamma Plant - Osawa Plant
Covered Period	Apr. 1, 2020 - Mar. 31, 2021
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### ■ Guidelines Referenced

GRI (Global Reporting Initiative)  
GRI Sustainability Reporting Standards (2016/2018/2019)  
Model Color Palette for Color Universal Design  
(URL: <http://www.cudo.jp/colorset>)

For further information about our social responsibility activities, please see our website.



Web

<https://www.nidek-intl.com/csr/>

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Training and Education / Diversity / Fair Business Practices / Information Security  
/ Product Liability / Social Responsibility etc.

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Learn more about us in our official website

URL: <https://www.nidek-intl.com/>



# About NIDEK CO., LTD.

## Corporate Profile (As of March 31, 2021)

Company name	NIDEK CO., LTD.
Head Office	34-14 Maehama, Hiroishi-cho, Gamagori, Aichi, 443-0038, JAPAN TEL: 81-533-67-6611
President and CEO	Motoki Ozawa
Establishment	July 7, 1971 (Initiated: August 8, 1971)
Capital	461.89 million JPY
Employees	1,628 (Male: 1,269 / Female: 359) Note: Company officers and advisors are excluded.

## Business

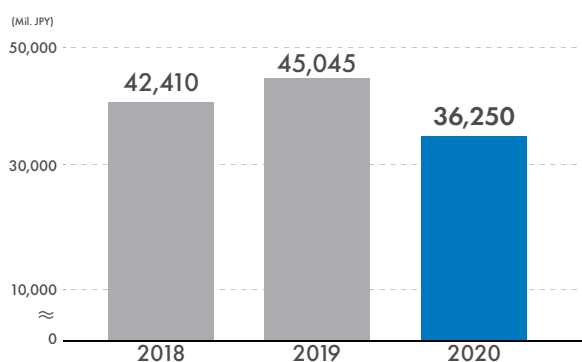
Business Fields	Major Contents
Ophthalmology & Optometry	The structure of the eye is complex and delicate. It is therefore essential to have precise and detailed examination data and accurate surgical equipment. Based on our long history of R&D, we have created a variety of products utilizing our advanced technology.
Lens Edging	High quality lenses and frames are not enough to make a comfortable pair of glasses — accurate and reliable lens processing technologies are necessary to deliver a perfect fit of lenses and frames. We remain committed to developing innovative lens edgers in order to promote comfortable vision life all over the world.
Coating	Our thin film coating technology enhances the performance of day-to-day advancements in electric displays and optical components. Combination of nano-level thin films allows transmission and reflection of specific light wavelengths according to customers' various needs.

## Offices

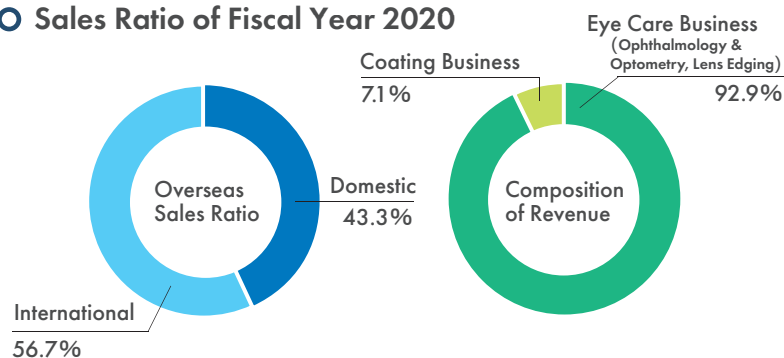


## Data

### Revenue



### Sales Ratio of Fiscal Year 2020



# Top Message

*To Continue Being a Company  
Providing Joy and Emotion*

NIDEK CO., LTD.  
President and CEO

小澤素生



## NIDEK's Initiatives for Fiscal Year 2020

I would like to offer my heartfelt sympathy to the people affected by the challenges of the novel coronavirus and would also like to express my deepest appreciation to all the health care professionals and others who are putting in the effort to prevent the spread of this infection.

The year 2020 was a year of great challenge for the entire world due to the spread of novel coronavirus. Although the economy, which fell sharply from April to June, has since been recovering, the novel coronavirus still has not yet subsided neither in Japan nor overseas. The growth rate of the world economy has fallen by 3%, the first negative growth in the 21st century, whereas for Japan there has been a 5% drop due to the restriction on economic activities including lockdowns and emergency declarations.

In this environment, we were able to release products for the prevention of novel coronavirus infection and remote-controlled products for opticians in fiscal year 2020. Also, we worked to gather and disseminate information through marketing and exhibitions to digitally support customer communication. This included the use of videos to introduce our services and products. Within the company, we introduced digital tools such as Office365 and business automation RPA, and implemented remote meetings and telework, making this year a year of even greater digitalization.

## Marking Our 50th Anniversary

As we are celebrating our 50th anniversary in August 2021, I would like to express my sincere gratitude to all our business partners, local residents, and all persons concerned.

We have renewed our corporate logo taking this opportunity of our 50th anniversary. In our logo, we express our determination to further globally contribute to healthcare as well as ophthalmology for the next 50 years. The growth curve in our logo represents the prosperity of both our customers and NIDEK.

In recent years, there has been an accelerating global movement to address social issues, such as the Sustainable Development Goals (SDGs) set forth by the United Nations. Under these circumstances, we believe that it is important to transform into a "solution-type company" that solves the problems of stakeholders and to meet their expectations. We will continue to aim at being a leading company in Eye & Health Care, providing solutions to our customers through our products and services and to start afresh to strive for our business goals.

# CSR Activities

## NIDEK Corporate Conduct Charter

We continue to conduct our “Eye & Health Care” business globally while always being true to our core values and we observe the letter and spirit of all laws and regulations in Japan and abroad, and act with a strong sense of ethics and fairness to contribute to the development of a sustainable world society.

### 1. Respect for Human Rights

We respect the human rights of all people. We do not give discriminatory treatment, undermine human dignity, or allow child labor or forced labor.

### 2. Promoting Transparent Corporate Activities

We promote highly transparent corporate activities by communicating with various stakeholders and disclosing corporate information as appropriate.

### 3. Ensuring Safety and Quality of Products and Service

We make an effort to create new opportunity for healthy and comfortable life of people, provide safe and high quality products and services, and try to obtain satisfaction and loyalty from our customers.

### 4. Proactive Environmental Responsibility

We recognize the importance of global and regional environment preservation and continue to improve activities to contribute to formation of a recycling society.

### 5. In Harmony with Society

We strive to promote social responsibility programs actively as good corporate citizens and be harmonized with the local community. In addition, we respect international cultures and customs and hopefully contribute to development of the region.

### 6. Creating a Wholesome and Comfortable Working Environment

We secure the safety and health of our employees in their workplace and establish an ideal working environment in order to bring about economic, mental and temporal comfort and affluence to our employees.

### 7. Banning any Relations with Anti-Social Forces

We do not have any relationship with anti-social forces, and resolutely deal with unreasonable demands by working with specialized external agencies.

Our top management recognizes the realization of the spirit of our corporate charter is their responsibility. Management will offer a good example and raise awareness of our charter to our employees. If incidents contrary to the principles of this charter occur, top management themselves must take the lead in solving problems, and take action to investigate the cause and prevent recurrence.

This corporate conduct charter is the foundation of our company's CSR activities. It is described in various tools including compliance manuals, corporate philosophy booklets and websites so that employees can refer to it at any time.



(Left) Booklet “NIDEK Spirit”. This summarizes NIDEK’s company philosophy.

(Middle) NIDEK’s compliance manual

(Right) NIDEK’s conduct policy. This is posted in all workplace.

## NIDEK's CSR Committee

We established the CSR committee to build good relationships with all stakeholders through CSR activities which coincides with our business in order to continue being a reliable and sustainable company.

### Roles of the CSR Committee

1. Make and plan CSR policies and activities.
2. Monitor and supervise the executing situation of CSR activities.
3. Manage internal and external disclosures of CSR-related information, and conduct public hearing activities.
4. Provide education and disseminate CSR.
5. Resolve CSR-issues, conduct necessary investigations or request relevant departments for investigations.
6. Instruct to take corrective action in CSR activities and to report the results.
7. Coordinate the efforts and outcomes of committees and departments related to CSR.

## Stakeholder Engagement

We have various stakeholders involved through our business. Our business actions reflect thoughts and requests heard through communication with stakeholders.

Stakeholder List	Responsibilities	Ways of Communication
Customers	<ul style="list-style-type: none"> <li>● Providing safe and high quality products</li> <li>● Promoting environmentally friendly design</li> <li>● Responding to inquiries</li> <li>● Offering suitable products and services</li> <li>● Providing appropriate support to customers</li> </ul>	<ul style="list-style-type: none"> <li>● Business activities</li> <li>● Cooperative researches</li> <li>● Support center</li> <li>● Contact form in NIDEK's website</li> <li>● Showrooms and exhibitions</li> </ul>
Business Associates	<ul style="list-style-type: none"> <li>● Enforce fair and square business trades</li> </ul>	<ul style="list-style-type: none"> <li>● Briefing sessions</li> <li>● Technology displays</li> <li>● Negotiating regularly</li> <li>● Information desks of each supply and sales department</li> </ul>
Employees	<ul style="list-style-type: none"> <li>● Development and utilization of human resources</li> <li>● Respect diversified human resources and working styles</li> <li>● Considering industrial safety and health</li> <li>● Respecting human rights</li> </ul>	<ul style="list-style-type: none"> <li>● Human resource development programs</li> <li>● Help desks</li> <li>● Company newsletters</li> <li>● Safety Management Committee</li> <li>● Company Benefits Committee</li> <li>● Conversations and Meetings</li> </ul>
Communities	<ul style="list-style-type: none"> <li>● Community contribution</li> <li>● Accident and disaster prevention in workplaces</li> </ul>	<ul style="list-style-type: none"> <li>● Volunteer activities</li> <li>● Taking part in community events</li> <li>● Plant tours</li> <li>● Visiting lectures</li> <li>● Emergency drills</li> </ul>
Government	<ul style="list-style-type: none"> <li>● Legal compliance</li> <li>● Labor management</li> <li>● Responding to legal reforms</li> </ul>	<ul style="list-style-type: none"> <li>● Trainings divided by hierarchy</li> <li>● Trainings divided by positions</li> </ul>



# Environment

環境



## Environmental Policy

NIDEK has recognized the importance of corporate social responsibility and global environment conservation. For this reason, we perform the improvement activities continuously which contribute to the establishment of a recycling-based society.

### Environmental Policy

1. NIDEK will identify the environmental effects resulting from our business activities. We will promote pollution prevention, usage of sustainable resources, addressing climate change and biodiversity along with ecosystem protection with all workers by having environmental targets. The environmental targets will be updated as necessary to improve environmental protection. We will also comply with environmental rules such as laws, ordinances, regulations and self-limitations, and respect stakeholders' opinions.
2. We will considerate the impact our business activities, product manufacturing and services have on the environment. We will particularly promote the environment conservation activities described below.
  - (1) Environmentally Friendly Design  
We will eliminate hazardous substances from our major products and promote green procurement. We will provide eco-friendly products which consider the effects on the environment from material procurement to product disposal.
  - (2) Energy Saving  
We will promote energy efficiency by introducing low-energy consumption processes in designing and manufacturing products.
  - (3) Waste Reduction and Resource Conservation  
We will reduce waste generation by promoting the "3R-rule (reduce, reuse, and recycle)" along with devising sustainable use of resources. We will also promote Zero Emission.
  - (4) Contribution to the Environment and Society  
We will contribute to environment conservation by providing environmental information and communicating with the community from the point of view of CSR.
  - (5) Proper Control of Chemical Use  
We will take an effort to prevent pollution to air, water, and soil. We will promote appropriate management of chemicals in order to protect biodiversity.
  - (6) Emission Control of Fluorocarbons  
We will protect the ozone layer and mitigate climate change due to global warming by appropriate management (prevention of fluorocarbons leakage and promotion of non-fluorocarbon substitutes) of refrigerators, freezers, and air conditioners for institutional use.
  - (7) Business Continuity Planning (BCP)  
When emergencies such as disasters that are assumed to be caused by climate change occur, we will minimize damage by the BCP and take actions to continue and restore business.
3. We will improve all employee awareness and understanding of environmental policy and sustainable global environment conservation by promoting environmental education and in-house publicity activities. We will also expect understanding and cooperation from affiliated companies with the environmental policy

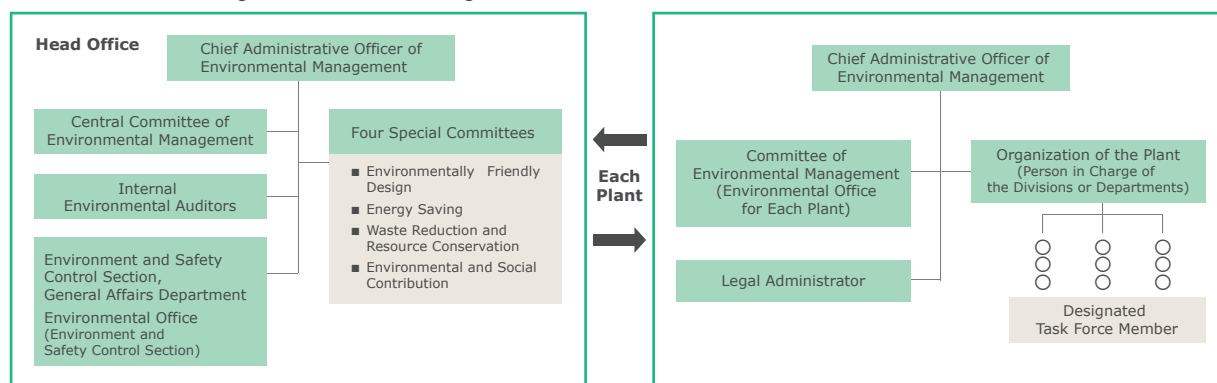


## Environmental Management System

We have the Central Committee of Environmental Management and four special committees under the Chief Administrative Officer of Environmental Management. Each plant has the Committee of Environmental Management to make efforts toward further environmental improvement.

Reports from each plant are shared for continuous improvement of the whole company.

### Environmental Management Promotion Organization Chart



## Environmental Accounting

Environmental accounting is a system for recognizing the costs of environmental conservation in business activities and the effects (economic effects) obtained from such activities, and for measuring them as quantitatively as possible. Items are reviewed as appropriate to promote appropriate initiatives in accordance with the Environmental Accounting Guideline 2005 issued by the Ministry of the Environment. In fiscal year 2020, we invested a total of 145.87 million yen in investments and expenses.

(Million yen)

Categories Corresponding to Business Activities	Contents	Breakdown	
		Investments	Costs
Business Area Cost			
Pollution Prevention Cost	Cost for preventing air, water, noise, vibration and odor pollution as well as ground contamination and sinkage.	0	4.63
Global Environmental Conservation Cost	Cost for energy conservation including expenses for curbing the emission of greenhouse gases.	1.07	36
Resource Circulation Cost	Cost for disposal and recycling of industrial and municipal waste.	0	70
Upstream / Downstream Costs	Costs for containers and packaging materials, resale, etc. (downstream cost).	0	0
Administration Cost	Cost for monitoring environmental impact and environmental training.	0	24.5
R&D Cost	Cost for environmental conservation in research and development.	—	—
Social Activity Cost	Cost for environmental conservation social activities such as clean campaigns with no direct relationship to the business activities of the company or other organization.	0	3.39
Environmental Remediation Cost	Cost to restore the natural environment back to its original state, cost to cover degradation suits connected with environmental conservation.	0	6.28
Total		1.07	144.8

Prepared with reference to Environmental Guidelines 2005.

<Business Area Cost>

- Only the cost for major facilities are counted. (Major facility: A facility whose annual cost exceeds 1 million yen)
- Facilities that are related to both pollution prevention costs and global environmental conservation costs are accounted in one category.
- No cost prorating of applicable to composite costs has been performed.
- Electricity costs are not aggregated.

<Upstream and downstream costs>

- The cost of green procurement is not included.

## Green Supply Chains

Under our Environmental Policy, we promote environment-centric procurement by requesting suppliers to agree to organizing an environmental management system based on ISO 14001 certification.

## Eco-Friendly Products

We have reduced harmful substances from products as well as striven for the minimum environmental load in developing and manufacturing products.

We released three eco-friendly products in 2020. All accomplished lightweight, energy-saving and high degradability and material recyclability among with improving their performance and function.

### ● Multifunction Edger ME-1500

The ME-1500 is a high-end model lens edger that can receive shape data for editing and processing eyeglass lenses to be perfectly fitted into various frames.



- High base curve processing
- Step beveling/ partial step processing
- Multi beveling
- Mini beveling
- Automatic 3D drilling
- Design processing (design cut, special safety beveling, facet, beveled surface, partial grooving/ beveling, shape change)

Despite its multiple functions, the device itself weighs less than 52 kg and consumes a maximum of 1.5 kVA, making it both environmentally friendly and power saving.

### ● Intelligent Blocker ICE-1500

The ICE-1500 is a device intended for use in attaching a lens cup to a lens for processing (blocking).

A variety of functions related to the preparation of lens processing are integrated into this single unit.



- Automatic lens measurement and blocking
- Partial step measurement
- Equipped with a variety of shape editing functions
- High-wrap curve frame tracer (Except for NT type)

In addition to compliance with regulations on hazardous substances, the product weighs only 21 kg and the power consumption is an energy-saving 110 VA.

When we create eco-friendly products, we consider environmental influences from material procurement to disposal of waste. We place high importance on eco-friendly from the product planning and designing stage. Based on our Product Environmental Assessment Provision, we cooperate with our developing departments, manufacturing departments, and supply chains in using reusable materials, simplifying product structures for easy disassembling, reducing numbers of parts and screws used, saving package waste and providing disposal procedures as well as weight reducing and electric power saving. We will continue promotion of developing and producing eco-friendly product so that we can reduce environmental loads.

**Environmentally Friendly Design Committee**

## TOPICS Introduction of Solar Power Generation

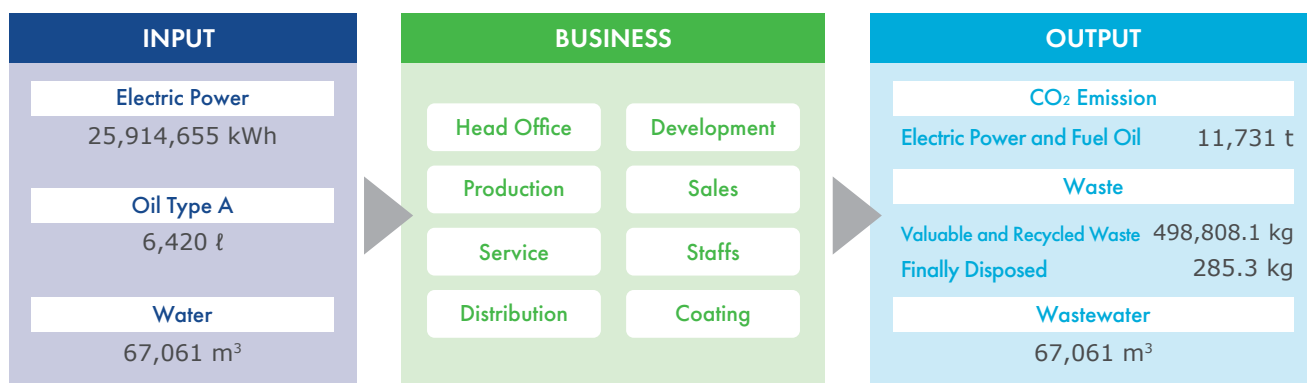
In order to reduce CO<sub>2</sub> emissions from fossil fuel use, we have installed solar power generation systems at our Hamacho Plant since 2009, our Osawa Plant since 2013, and the IOL Factory of our Hiroishi Plant since 2014. The actual monthly power generation capacity\* in fiscal year 2020 was approximately 1,158,980 kWh. In terms of CO<sub>2</sub> absorbed by the trees, the effect is the equivalent to planting approximately 26,030 cedar trees.

\*Power conditioner output power



Solar panels on the roof of our Osawa Plant

## Overview of Environmental Impact

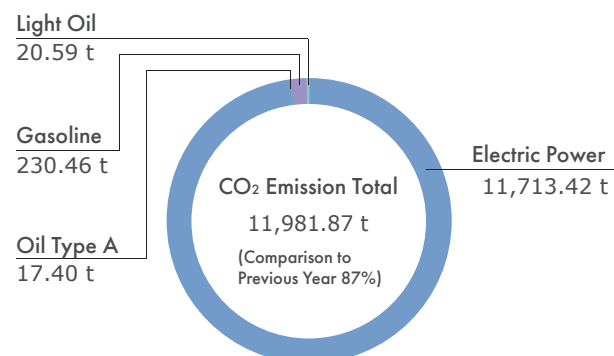


## Actions on Climate Change

We work on performing business activities which concerns the protection of the environment and protecting ecosystems by reducing CO<sub>2</sub> emissions.

Comparing the each resource's usage by converting them into CO<sub>2</sub> emissions, electric power emitted the most. Therefore, we conduct a company-wide basis power saving activity on daily basis.

### CO<sub>2</sub> Emission



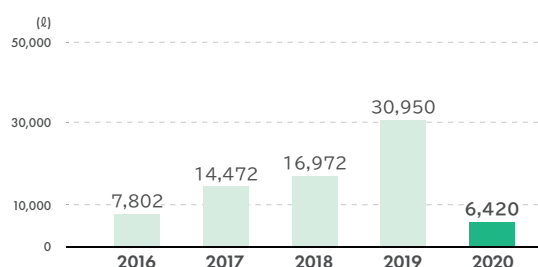
Note: Includes gasoline and light oil used in company cars of five plants and Gamagori branch.

### Electric Power Consumption

In 2020, during the decrease in production volume due to the impact of the novel coronavirus, we were able to reduce power consumption by energy-saving activities and replacement of equipment with energy-saving products.

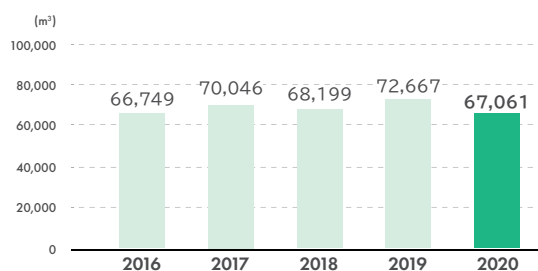


### Fuel Oil Consumption



### Water Consumption

In 2020, while production volume decreased due to the impact of novel coronavirus, we were able to further reduce water consumption through water-saving efforts such as improving the efficiency of the cleaning process.



## Reducing Waste Volumes

To achieve zero waste emission, we have been auditing our final disposals and improving the recycling rate. In 2020, we were able to recycle more than 99% of our waste.

	(kg)
FY 2020	
Valuables / Recyclables	498,808.1
Final Disposal	285.3
Total	499,093.4
Recycling Rate	99.9%

# Social

## 社会



### Safety Management Policy

NIDEK considers that securing health and safety of all employees is a foundation of company management and a social responsibility. We have made efforts to ensure a safe and healthy workplace by following the guideline of NIDEK's corporate conduct charter.

#### Safety Management Policy

1. NIDEK will comply with all laws, internal regulations and standards related to safety management activities.
2. All employees including management will make efforts to appropriately conduct an occupational health and safety management system according to their responsibilities and actions.
3. We will inform the importance of safety management activities to all employees and raise awareness through necessary training and educations.
4. We will conduct safety management activities with the cooperation of all employees, and endeavor to ensure the safety and health of all employees and their families.
  - (1) Health and Safety  
We will endeavor to create a comfortable workspace by properly managing risk assessment, risk prediction, near miss reporting and chemical substances control.
  - (2) Health  
We will endeavor to maintain the health of all employees by promoting mental and physical health activities.
  - (3) Traffic Safety  
We will work on decreasing traffic accidents by enhancing road safety and promoting road safety measures.
  - (4) Disaster Prevention  
We will secure employee safety including visitors by promoting proactive measures against possible disaster risk.

### Safety Management Activities

We have constructed a safety management system based on the Occupational Safety and Health Management System. Four special committees. (Safety and Sanitation / Health / Traffic Safety / Disaster Damage Prevention) are to ensure employees' safety and health.

#### ● Industrial Accident Prevention Programs

For the purpose of eliminating industrial accidents and enhancing safety consciousness, we conduct risk prediction educations and risk

assessment to new, mid-career and transferred employees. In fiscal year 2020, we created videos featuring examples of past industrial accidents with the theme of "Caution for motorcyclists from the perspective of car drivers" as a warning to all employees.

#### ● Emergency Drills

An emergency drill for employees is held every year in October or November.

Fire extinguisher training during an emergency drill



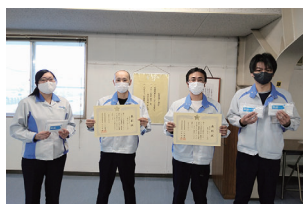
### ● Traffic Accident Prevention

We conduct road safety training for people who newly became outside duty workers.

### ● Perfect Driver 100-Day Campaign

Twelve teams participated in the Perfect Driver 100-Day Campaign sponsored by the Gamagori City Safety Driving Management Council. Ten teams achieved a perfect no-accident and no-violation record.

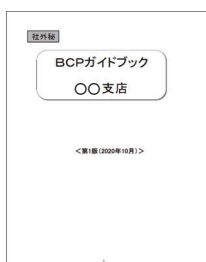
Awards ceremony for the representatives of the teams that achieved the goal.



### ● Business Continuity Planning

We have a business continuity plan (BCP)\* in preparation for large-scale disasters and such. In August 2020, we implemented an e-learning program for all employees to improve their understanding of disaster awareness. In November, we conducted a training session for Disaster Countermeasures Headquarters staff on the theme of "Review and countermeasures for the novel coronavirus" to apply them to activities hereafter.

Additionally, as part of the groupwide BCP promotion, we have created a BCP guidebook for the whole NIDEK group and put it into operation.



\*Business Continuity Plan outlines procedures of daily activities and emergency actions to enable prompt recovery/continuity of its business activities in the face of accidents/disasters. Such emergencies include natural disasters, fires, novel influenza and terrorism.

## Health Activities

### ● Aichiken Kenkou Keiei Suishin Kigyoi

In November 2019, we were registered as an organization which promotes maintaining and improvement of employees' health.



### ● 2021 Certified Health and Productivity Management Organization (Large Enterprise Category)

In March 2021, we were selected as "2021 Certified Health and Productivity Management Organization (Large Enterprise Category)" by the Ministry of Economy, Trade and Industry.



### ● Medical Checkup

We provide annual medical checkup for employees and in addition, special medical checkup for employees who handle hazardous substances. We also support employees who need secondary checkup.

To employees who became 35 years old, and employees who are 40 years old and over, we provide lifestyle disease checkup. To employees who need improvement in their lifestyle, we give specific health guidance.

### ● Health Promoting Activities

We have designated a three-month period from October 1 to December 31 as the "Health Challenging Period" with the aim of enhancing health promotion (health maintenance and prevention of modern diseases) and lifestyle improvement.

The program is open to employees and their families, and participants set goals to improve their lifestyles, such as quitting smoking, losing weight and building physical fitness. The participants then self-report their achievements.

In fiscal year 2020, 208 people participated in the program and 175 people achieved their goals.



A poster promoting Health Challenging Period

### ● Mental Health Care Promotion

Again in 2020, we conducted the annual Stress Check Program for the entire staff. We also have a consultation counter for employees and their families to support employees from the viewpoint of mental aspect.

**Stress Check Screening Rate** (%)

	2018	2019	2020
Stress Check Screening Rate	83.8	87.5	91.5

## Personnel System

We have renewed our personnel system in April 2019 in order to respond to requests from our employees about human resource development and performance rating.

### Concept of the New Personnel System

<b>Simple</b>	Easy to understand
<b>Communicative</b>	Value communication
<b>Challenging</b>	Create a challenging environment

## Training and Education Systems

### ● New Employees Education

The first two months from joining the company is training period for new employees. We have two programs, group training and on-the-job training.

### Education Systems

	New Employees	Regular Employees	Senior Staffs	Section Managers	General Managers and Officers
Training by Position	New Employees Education			Managerial Education	Workshop for Senior Managers and Directors
Training by Objective		Business Skills Training	Next Generation Leaders Program		
Foreign Language Trainings	TOEIC				
	Language Training				
Outside Trainings	Open Seminars, Academic Conference Attendance, etc.				

Autonomy and creation as a theme, we deepen the understanding of our company, deepen bonds between newly hired employees and teach the basics as working people and NIDEK employees.

Our own group training program is planned, reviewed, operated, and conducted by senior employees selected from within the company. Through group work and lectures, new employees learn how to prepare themselves as a member of society.

In the workplace training, new employees basically acquire the practical knowledge required for their respective assignments.

### ● Foreign Language Training

We strengthen our employees' foreign linguistic ability by providing trainings such as TOEIC IP tests and English conversation trainings.

### ● Education System in NIDEK

We reconsider our training program every year to make the system more effective. In addition, the knowledge and information necessary for each department is acquired through on-the-job training, outside seminars and academic conferences. We collect the latest technology and information to improve our knowledge, ability and technology.

### Major trainings held in 2020

Program	Summary
Next Generation Leaders Program	Training for next generation leader candidates
Promotional Training	Training for recently promoted employees
Evaluator Training	Training for newly appointed evaluators



## Respecting Diversity

### ● Working Hours Management

Long working hours may affect not only one's health but also their private life. In order to have everyone live a healthy and fulfilling life, we work on providing a good working environment by promoting the use of paid vacations and having no-overtime days and such.

In fiscal year 2020, we implemented telecommuting and staggered work hours in consideration of safety and health as a measure to prevent infection by the novel coronavirus. We will continue to promote support for "new lifestyles" and strive to minimize the risk of infection.

Monthly Average of Non-scheduled Working Hours per Employee (Hours)

	2016	2017	2018	2019	2020
Non-Scheduled Working Hours	17.79	18.88	16.00	19.33	11.05

### ● Paid Leave

We provide ten days of paid leaves for the first year. Thereafter, two days are added each year until up to twenty days. Conserved holidays can be carried over to the next year and up to forty days are granted for one year.

Average of Days Received for Paid Leave (Days)

	2016	2017	2018	2019	2020
Paid Leave	11.7	11.9	12.5	13.7	11.9

### ● Systems Balancing Childcare, Family Care and Treatment

Parental Leave Utilization Rate (%)

	2016	2017	2018	2019	2020
Mothers	100	100	100	100	100
Fathers	6	10	25	43	24

We provide a day-care center in Gamagori City for employees to return to work without anxiety.

Inside the day-care center



## List of Systems

System	Summary
Systems Related to Child Care (Before Birth)	<ul style="list-style-type: none"> <li>● <b>Commuting Relaxation During Pregnancy</b> Employees who are pregnant can choose either staggering working hours or working fewer hours.</li> <li>● <b>Working Time Options</b> Used when doctor's appointment such as medical checkup is needed.</li> <li>● <b>Childbirth Leave</b> Up to six weeks (14 weeks in the case of multiple birth) are given to mothers.</li> </ul>
Systems Related to Child Care (After Birth)	<ul style="list-style-type: none"> <li>● <b>Child Care Leave</b> Child care leave can be taken until the day before the child's first birthday (up to child's second birthday for special reasons).</li> <li>● <b>Working Time Options</b> Short-time working system for child care can be used until the child reaches fourth grade. Up to two hours of shortage per day can be requested. If there are special reasons, working hours can be shortened to four and a half hours at the shortest.</li> <li>● <b>Sick/Injured Child Care Leave</b> Up to five days (ten days if there are more than two children who are under fourth grade) can be taken.</li> </ul>
Systems Related to Child Care (Others)	<ul style="list-style-type: none"> <li>● <b>Childbirth Attendance</b> One day as a special paid leave</li> <li>● <b>Restrictions on Overtime and Night Labor</b></li> <li>● <b>Staggered Work Hours</b> With the approval of the head of the department, work hours may be staggered within one hour before or after regular work hours until the employee's child reaches the fourth grade.</li> </ul>
Systems Related to Family Care	<ul style="list-style-type: none"> <li>● <b>Family Care Leave (Long term)</b> Up to 93 days can be taken.</li> <li>● <b>Family Care Leave (Short term)</b> Up to five days (ten days if there are more than two people who needs family care) can be taken.</li> <li>● <b>Working Time Options</b> Up to two hours of shortage per day can be requested for three years. If there are special reasons, working hours can be shortened to four and a half hours at the shortest.</li> <li>● <b>Restrictions on Overtime and Night Labor</b></li> <li>● <b>Staggered Work Hours</b> With the approval of the head of the department, work hours may be staggered within one hour before or after regular work hours.</li> </ul>
Health and Employment Supporting System	In order to support balancing continuous injuries or illness treatment and employment, we provide adjustment of work days, working time options, commuting relaxation and such.



### ● Next Generation Certification Mark

On June 25, 2020, we have achieved Kurumin Mark as a company supporting work and family-life balance, certified from the general of Aichi Labour Bureau.



### ● Aichi Josei Kagayaki Company

We are certificated by Aichi Prefecture as an "Aichi Josei Kagayaki Company (Aichi's Company with Active Participation of Women)", a company whose top management promotes active participation of women by expanding employment, expanding work areas, training, appointing managers, promoting work-life balance and creating an environment where childcare and nursing can be done while working.

We aim to enlarge women's "stability" and "success" in the workplaces.



### ● Respect for Human Rights and Prohibition of Discrimination

All employees at NIDEK respect the human rights of all people and act in accordance with the NIDEK Corporate Conduct Charter in order to create a workplace free of discriminatory treatment and actions that undermine individual dignity.

## TOPICS "Silver Prize for Healthy Declaration Excellence Office 2019"

On June 17, 2020, we were awarded "the Silver Prize for Healthy Declaration Excellence Office for the fiscal year of 2019" by Aichi Branch of the Japan Health Insurance Association (Kyokai Kenpo).

Aichi Branch of the Japan Health Insurance Association awards "Healthy Declaration Excellence Office" to workplaces that have been particularly proactive in maintaining and promoting employees' health. This is the first time we have received the Silver Award.

Based on the recognition that ensuring the safety and health of our employees and their families is the foundation of our corporate management and our social responsibility, we will continue to take proactive measures to ensure a safe and secure work environment.



A link to Aichi Branch of the Japan Health Insurance Association "Healthy Declaration Excellence Office" Awards System Website:

<https://www.kyoukaikenpo.or.jp/shibu/aichi/cat070/2018080200/201808062221/2019032881/>

## Quality Policy

NIDEK's business is to realize "Invisible to Visible" and "Lively and Healthy Society." For people's healthy and comfortable life, we will create new opportunities and provide safe and high quality products and services.

Based on our quality policy, we are working on maintaining and improving quality on a company-wide basis. We have regular internal audits and in addition, we work on "quality education" for our employees.

### 1. Contribution to the improvement of QOV

NIDEK will provide high-quality products and services which meet the requirements to contribute to the improvement of patient's QOV (Quality of Vision).

### 2. Quality Assurance from the Customer's Perspective

We will assure quality from customer's perspective in all stages of product design, production, and service.

### 3. Continual Improvement of the Quality Management System

We will establish a quality management system and make continual improvements to maintain its effectiveness.

### 4. Setting Quality Targets

We will set quality targets for each fiscal year and strive to achieve these targets in order to implement our quality policy.

### 5. Publication and Review of the Quality Policy

We will present the quality policy in order that it is clearly understood by all employees. In addition, we will reconsider the policy as necessary to maintain its suitability.

## Approaches to Quality

### ● Quality Assurance System

Based on the international standard ISO 13485, we have product development, production and sales activities under our quality management system. Each process has strict quality reviews to work continuously on improvements. Customers' voice and market information collected will be used to make better products.

Additionally, we review the effectiveness of our quality management system in regular meetings of our quality assurance committee.

### ● Quality Management System (QMS)

Our business is to develop, manufacture, sale and have customer service of medical devices based on our business domain "Eye & Health Care." Medical devices could be sold only when they pass the laws of each country, related to QMS and are permitted to sell only products manufactured according to the law.

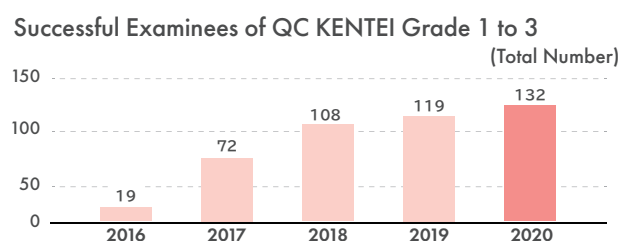
In recent years, QMS review tends to be stricter due to the growing needs for quality and safety for medical devices. For this reason, we established a

project team to restructure QMS in 2015. The aim of the team is to enhance compliance and improve product quality. In 2018, we had training with the people concerned before QMS surveillance and made QMS become established.

### ● Quality Management Education

We are working on raising awareness to quality in order to gain knowledge that is useful in our operation such as quality management's way of thinking, methodology and problem-solving process. In the relevant departments, employees take the QC KENTEI (Quality Management and Quality Control Examination)\*. A total number of 132 people passed grade 1 to 3 (March 2021).

\*QC KENTEI which is held under the Japanese Standards Association and the Union of Japanese Scientists and Engineers, can objectively evaluate the knowledge about quality control.



## ● Periodic Internal Audit

We conduct internal audits regularly to confirm that our quality management system complies with the laws and regulations of medical devices in each country. We operate our business based on our manuals and that our quality management system.

## ● Implementation of Quality Control

In order to improve quality in general and mass produce products of particularly high quality, we have developed our own quality control system.

Since fiscal year 2020, important indicators such as "complaint rate," "non-conformance rate," and "CAPA (corrective and preventive action)" have been displayed on the factory electronic display with automatic updates every hour. In addition, traffic signal color-coded indicators (green: normal, yellow: caution, red: warning) have been introduced as monitoring indicators.

## ● Certification of International Standards

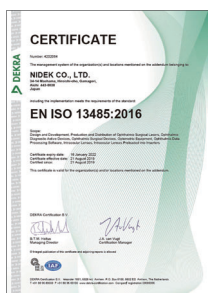
We are certified ISO 9001 and ISO 13485 Medical devices.



### ISO 9001

Registration Institution (2021):  
TÜV Rheinland Cert GmbH

Registration Number (2021)  
01 100 107201



### ISO 13485

Registration Institution (2021):  
DEKRA Certification B.V.

Registration Number (2021)  
4202064

## ● Customer Support

We have a system for customer support by the product and the areas of customers' in order to respond to customers inside and outside the country.

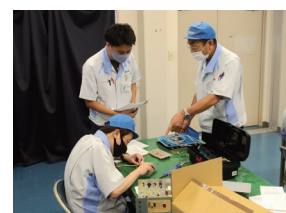
## ● Effort to Obtain National Trade Certificates

In order to develop human resources who are responsible for manufacturing, we actively support the acquisition of trade skill tests for "Electronic Equipment Assembling\*" and "Optical Instruments Manufacturing\*\*", which are designed to help employees at production sites acquire practical skills and knowledge.

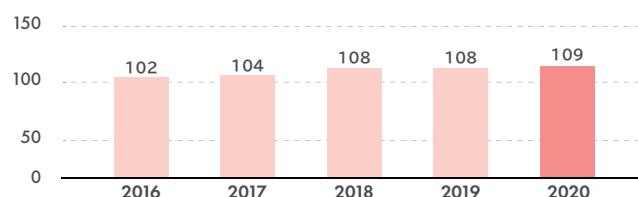
Employees who have passed the exam in the past serve as instructors for the voluntarily organized in-house study sessions resulting in a total of 121 employees who have passed the exam (as of March 2021).

\*Academic and practical tests for assembling electronic equipment conducted by the Prefectural Vocational Ability Development Association.

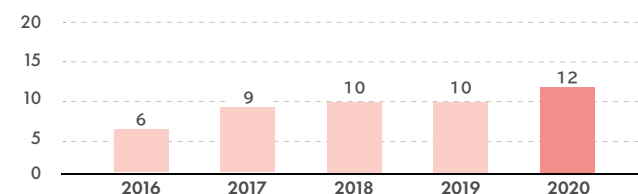
\*\*Academic and practical tests for manufacturing optical equipment conducted by the Prefectural Vocational Ability Development Association.



Trade skill tests for Electronic Equipment Assembling  
Total number of successful applicants (Expert to 2nd Grade)  
(Total Number)



Trade skill tests for Optical Instruments Manufacturing  
Total number of successful applicants (1st Grade)  
(Actual Number)



## Guidelines for Procurement

In order to continue to be a company that is trusted by society based on the Charter of Corporate Behavior, we aim to build a good relationship with all stakeholders connected to our company. In our procurement activities, we will promote the establishment and maintenance of fair and appropriate relationships with our business partners.

### 1. Fair and Equitable Transaction

We will always strive to enhance communication with our business partners and conduct fair and equitable procurement activities.

### 2. Compliance with Laws and Regulations

We will comply with the laws, regulations, and other social norms of the countries and regions where our business partners operate, and strive to build relationships of trust with our business partners. In addition, we will appropriately protect and manage the information of our business partners obtained through our procurement activities.

### 3. Environmental Conservation and Protection

In accordance with our "Environmental Policy", we will strive for green procurement that considers environmental conservation, such as procuring parts and materials as minimal environmental impact as possible.

### 4. Promotion of CSR Procurement

We will strive to promote CSR activities together with our business partners to realize a sustainable society. We will seek the understanding and cooperation of our business partners based on "the Supply Chain CSR Procurement Promotion Guidebook."

## Supply Chain Management

### ● Briefing Sessions

At the beginning of each year, we hold a presentation for "Optica," the group of companies that manufacture and supply the parts used in our products. The purpose of this presentation is to clarify our current situation, present our future plans and policies, align our vectors, and deepen our understanding and cooperation in production activities.

We are always appreciative of the cooperation the Optica companies have provided to take measures to improve the quality of our products.

The presentation was held remotely in 2020.



### ● Supply Chain CSR Procurement Promotion Guidebook

CSR activities, which are the social responsibility of a company, began with environmental issues and have expanded to include human rights issues and information security. Interest in CSR activities is increasing year by year. In April 2020, we

created the Supply-Chain CSR Procurement Promotion Guidebook to promote a common understanding throughout our supply chain.

### Supply Chain CSR Procurement Promotion Guidebook Main Issues

- Human Rights and Labor
- Health and Safety
- Environment
- Fair Trade and Ethic
- Quality and Safety
- Information Security
- Social Responsibility

## Social Contribution Activities

We are engaged in various social contribution activities including environmental preservation such as local clean-up and environmental preservation.

Following are some of our activities of social contribution in 2020.

### ● Donation to the Japan Braille Library

Donation to the Japan Braille Library is becoming periodically. In 2020, the donation was used to make a book for people with visual disability and as operating funds for the library.



Audio book and player

### ● Collecting Eco-Caps

Since 2009, we have been rolling out the "Eco Cap Movement" to exchange collected plastic bottle caps for vaccines. In 2020, 191,393 caps (about 223 vaccines) were collected throughout the company.

### ● Collecting and Donating Used Stamps

We have collected 1.26 kg of old stamps in 2020, and donated them to the General Support Center for the Visually Handicapped.

### ● Lectures for Local Elementary and Middle Schools

We have continued lectures for students in elementary and middle schools since 2009 to have them more interested in eyes. In 2020, 2,226 students in 13 schools listened to our lecture.



### ● Sponsorship to the Para-sports Sailing Association of Japan (PSAJ)

We have been supporting PSAJ since November 2016. We will support the association continuously.

### ● Donating Face Guards

We donated face guards with anti-reflective coatings on both sides of the shield using the same vacuum deposition method\* used for NIDEK's eyeglass lenses to sign language interpretation facilities in Gamagori, Tokyo, and Kanagawa.

\* Vacuum deposition is a coating method. For details, please see [https://www.nidek-intl.com/product/coating\\_technical/coating\\_technique\\_1.html](https://www.nidek-intl.com/product/coating_technical/coating_technique_1.html).



### ● Sponsorship to Light-Up in Green

We lighted up a wall of our plant in green on March 11, 2021 during the World Glaucoma Week\*\* to participate in the Light Up in Green campaign held by Japan Glaucoma Society.

Light Up in Green is an event to raise awareness of Glaucoma by lighting up famous landmarks in green.

\*\*World Glaucoma Week is an event by World Glaucoma Association. It is held all over the world since 2008.



## TOPICS Response to Novel Coronavirus Infections

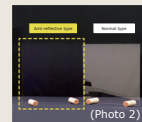
### Efforts to Combat Novel Coronavirus Infections through Business Activities

We offer products for splash protection that utilize our own anti-reflective coating technology.

- Face Guard (Photo 1)
- Acrylic Protection Board (Photo 2)
- High Transparent Aerosol Box (Photo 3)



(Photo 1)



(Photo 2)



(Photo 3)

## Infection prevention measures and response in the event of an outbreak

We have set up a task force headed by the president, who is responsible for overall infection prevention and business continuity, to determine, disseminate, and implement the necessary measures.

Daily precautions for employees and measures to be taken in case of infection or suspected infection are as follows.

### Infection prevention measures while at work

#### 1 Individual Health Management

- Employees should make it a habit to take their temperature before going to work.
- Employees who feel unwell should immediately notify their supervisor and return home.

#### 2 Masks

- Ensure that masks are worn in the company.
- Mask must cover nose and mouth.

#### 3 Notes on Lunch Time and Work Breaks

- Refrain from talking when mask is removed to eat or drink.
- Avoid sitting face-to-face or next to each other.
- Do not talk loudly, even when wearing a mask.

#### 4 Caution when Smoking

- Refrain from talking in the smoking room.

#### 5 Business trips and visitors

- Refrain from accepting domestic business trips and visitors by trying to postpone or hold online meetings. Consult with your immediate manager as necessary.
- Overseas business travel is generally prohibited for the time being.

#### 6 Notes on meetings

- Maintain sufficient space between people to avoid crowding.
- Keep meetings as short as possible.
- Proactively use online meetings.

#### 7 Prohibition of Business Meals

- Eating with business acquaintance is generally prohibited. If necessary, consult your immediate supervisor.

#### 8 Other

- Make effective use of Seminar Halls A and B to avoid crowds in the workplace.
- Ventilate adequately.
- Participation in seminars and other events that attract an unspecified number of people is generally prohibited. If necessary, consult your immediate supervisor.

### Measures to be Taken in Case of Infection or Suspected Infection

- If you consult with your family doctor or other familiar medical institution in the community, or a consultation center (public health center), report the information to the company.
- If an employee or a family member living with the employee is identified as a close contact, the employee should immediately report to the company and stay at home during the health observation period determined by the public health center (currently 14 days).
- If an employee tests positive, follow the instructions of the health authorities. Infected employees will be hospitalized at a medical institution or receive medical treatment at home or a hotel.

## Response Under a State of Emergency

We have implemented work shifts that limit the percentage of employees who come to work based on the status of the state of emergency, and maximize the use of work from home and staggered work hours.

### ① Eligible persons to work from home

- Employees with underlying medical conditions (including those who are pregnant)
- Public transportation users
- Workers in areas under a state of emergency

### ② Eligible persons for staggered work hours

- Public transportation users
- Employees whose children's elementary schools are closed
- Employees who are pregnant and have been instructed by their doctors to take precautionary measures
- Employees who have been judged by their supervisor to have no significant disruption to work due to staggered work hours as a measure to avoid the three Cs (closed spaces, crowded places, close-contact settings).



# Governance

## コーポレートガバナンス



### Compliance Policy

NIDEK considers that acting in accordance with common rules and norms of society is essential for continuing business and it is an important task for us to take the initiative. We do not just observe laws in letter as well as spirit, but also fulfill our ethical and social responsibilities which are required by rules and social norms.

We urge all of our employees to comply with "NIDEK Corporate Conduct Charter" not to break the trust of any stakeholder including our customers.

#### Basic Regulations and Handbook on Compliance

##### Compliance Manual

It explains the purpose of each action guideline and what should be observed in accordance with the NIDEK Corporate Conduct Charter.

##### Personal Information Protection Regulations / Specific Personal Information Protection Regulations

[https://www.nidek-intl.com/information/privacy\\_statement.html](https://www.nidek-intl.com/information/privacy_statement.html)

##### The EU General Data Protection Regulation

A basic policy regarding the protection of personal data obtained in the course of business activities in the European Economic Area.

##### Regulations for the Handling of Personal Health Information

A basic policy regarding the handling of personal information as to the physical and mental conditions of our employees.

##### Transparency Guidelines (Japanese)

<https://www.nidek.co.jp/csr/transparency.html>

##### Basic Policy on Prevention of Improper Use of Public Research Funds (Japanese)

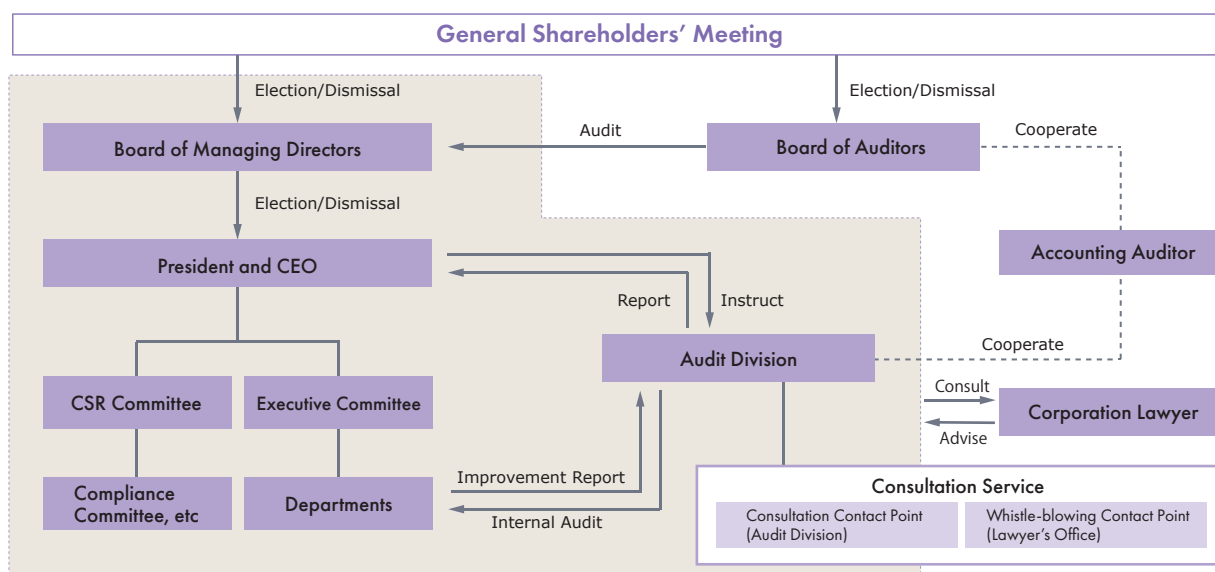
[https://www.nidek.co.jp/csr/public\\_research\\_spending.htm](https://www.nidek.co.jp/csr/public_research_spending.htm)

##### Procurement Policy (Supply Chain CSR Procurement Promotion Handbook) (Japanese)

[https://www.nidek.co.jp/csr/procurement\\_policy.html](https://www.nidek.co.jp/csr/procurement_policy.html)

### Corporate Governance System

We have established a highly objective and transparent governance system, including the establishment of an external consultation service.





## Compliance System

We have established the Compliance Committee to understand the compliance condition, to prevent violations of laws and regulations, and to prepare appropriate measures against the violation of laws and regulations.

### Roles of the Compliance Committee

1. Establishing, maintaining and managing the internal compliance system
2. Formulating and reviewing the compliance manual
3. Providing education and enlightenment on compliance
4. Monitoring implementation status of compliance activities
5. Investigating and addressing problems regarding compliance
6. Being in charge of a compliance consultation desk

## Efforts for Compliance

### ● Conduct Policy of our Employees

In order to raise the awareness of compliance among our employees, we have created a poster of "NIDEK Conduct Policy" and posted it in each workplace.

In this poster, the NIDEK Corporate Conduct Charter, the compliance test (checklist), information about the whistle-blowing desk and such are described.

### ● Compliance Education

We focus on compliance education for our employees and provide regular training programs by job class and job category according to the annual agenda established at the beginning of the fiscal year.

We set the common theme in each year and provide an opportunity to discuss in each workplace in order to improve the awareness and call out attention toward compliance.

## Educations and Trainings in 2020

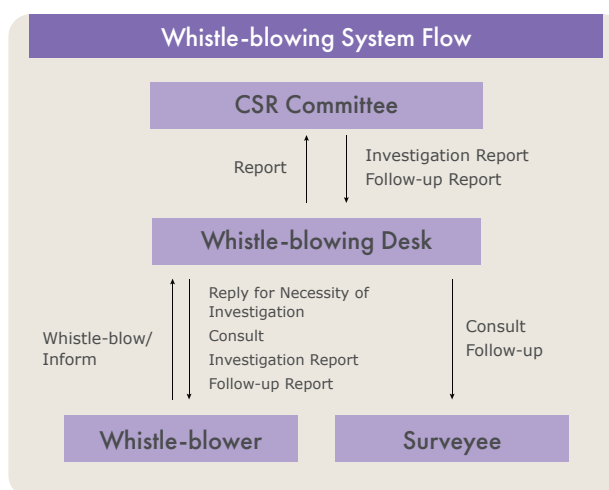
Managers	<ul style="list-style-type: none"> <li>● Compliance Training</li> <li>● Labor Management Education</li> </ul>
Employees of Sales Departments	<ul style="list-style-type: none"> <li>● Compliance Training for sales persons (Domestic/International)</li> </ul>
Employees of Development Departments	<ul style="list-style-type: none"> <li>● Research Ethics Education</li> </ul>
Newly Entered Employees	<ul style="list-style-type: none"> <li>● Compliance Training</li> </ul>
All Employees	<ul style="list-style-type: none"> <li>● Information Security Training</li> <li>● Workplace Harassment Prevention Training</li> </ul>

## Whistle-blowing System

### ● Whistle-blowing System

We have a "Whistle-blowing desk" outside the company and promoting it to our employees. Employees can consult or report the organizational or personal violation of laws to this desk. This system is aimed at early detection and correction of fraudulent acts and the enhancement of compliance.

Additionally, in order to prevent unfair disadvantages of the employee who reported or consulted, we have established a company regulation.



### ● Global System for Whistle-blowing

We have established a point of contact for whistle-blowing in which an external lawyer receives reports as well as expanded the entire whistle-blowing system in China since 2020.

In addition, we are working on the establishment of system and mechanism for whistle-blowing at all overseas subsidiaries for future operation.

## Basic Policy on Prevention of Improper Use of Public Research Funds

Based on guidelines such as Guidelines for Managing and Auditing Public Research Funds at Research Institutions, we have established a basic policy for proper operation and management to prevent unauthorized use of public research funds.

**1. Observe Guidelines, Rules and Guiding Principles**  
NIDEK will observe laws relating to prevention of unauthorized use of public research expenses and such guiding principles and guidelines by countries and funding agencies.

**2. Clarification of Allocation of Responsibilities**  
The allocation of responsibilities are as below.

Person in Charge	Job Title
Chief Administrator	President and CEO
General Manager	General Manager of Administration Division
Compliance Controller	Person in charge of public research funds in each division / department

**3. Establishment of Regulations and Operation Rules**  
We will establish codes of conduct, regulation of managing public research funds and prevention of unauthorized use as well as any other operation rules and procedures related to them, and inform them to all of our employees (researchers, office workers, person in charge) who are concerned with public research funds.

**4. Formulation and Implementation of Plan to Prevent Unauthorized Use**

A plan to prevent unauthorized use of public research funds will be formulated and implemented.

**5. Monitoring**

To execute public research funds properly, we will check the state of implementation of ordering / acceptance / payment and fiscal statements, and conduct inspection of materials.

**6. Establishment of Help Desks and Contact Offices**

We will establish help desks and contact offices for accusation of unauthorized use of public research funds and wrongdoings in research activities.

## Fair Business Practices

### ● Elimination of Anti-Social Forces

We have no relationship with any anti-social forces and will take a resolute attitude and cooperate with outside specialized agencies against unreasonable demands.

### ● Prevention of Corruption and Bribery

We determine in our compliance manual that we must not allow any illegal money transfer and unappropriated receptions and gifts, and strengthen anti-corruption through our whole business activities.

### ● Transparency with Medical Institutions

We disclose funds paid to medical institutions and other organizations based on the "Transparency Guidelines for the Medical Device Industry and its Relationships with Medical Institutions and Other Organization" by the Japan Federation of Medical Devices Associations (JFMDA) to improve the transparency and credibili-

ty of the relationship with medical institutions and other organizations and to contribute to the development of Eye & Health Care.

### Prohibition of Bribery, Inappropriate Gifts or Such and Conflict of Interest Transactions

#### ● Prohibition of Bribery

- We must not offer benefits such as money to take unfair advantages.
- We must not receive money in return for unfair advantages of customers and clients.
- We must not make demands for unfair advantages by using an advantageous position.
- We must not compel the distributors or people concerned, or to be involved in illegal transaction to take unfair advantages.

#### ● Prohibition of Inappropriate Gifts or Such

- We must not provide or receive excessive gifts or such in terms of conventional wisdom and common sense.

#### ● Prohibition of Conflict of Interest Transactions

- We must not engage in competition that leads to a company's disadvantage such as establishing the additional posts of executive officers or employees of other companies or doing a profit-oriented business.
- We must not conduct business with a company or for oneself or for a third party, such as selling products.
- Actions that might be contrary to the interest of the company must be openly revealed.
- We must not pocket company's fund or personal use of information obtained in work.

## Information Security

We believe that it is essential to achieve and maintain a high level of information security to protect our customers' and business partners' information. As a comprehensive measure of information security, we have established the Information Security Management System (ISMS) and have made efforts to protect our information assets from any threats.

### ● Information Security System

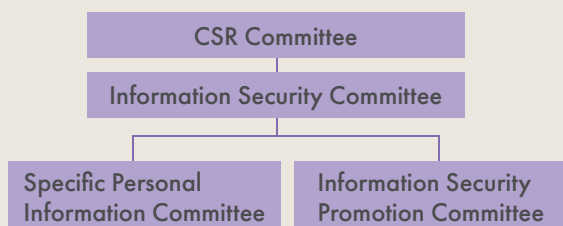
We have the Information Security Committee to maintain and strengthen information security. The committee decides company-wide information security policies such as data breach crisis management.

The committee consists of two subcommittees; the Specific Personal Information Committee and the Information Security Promotion Committee.

The Specific Personal Information Committee creates internal rules for proper handling of Social Security and Tax Numbers, develops and repairs systems that support them, considers management measures for specific personal information and conducts in-house trainings and educations.

The Information Security Promotion Committee perform substantive maintenance and management of information security such as preparing, revising and deliberation of discarding documents.

Information Security Organization Chart



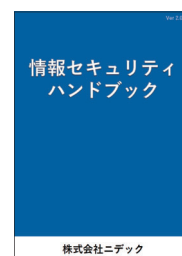
### ● Information Security Education

We have been training our employees to improve consciousness to information security on a regular basis.

In 2020, we conducted e-learning education for all employees (including officers, advisors, and employees who are transferred overseas) on the theme of strengthening measures against information leaks. We are working to reduce risks by strictly handling and managing external storage media such as USB flash drives.

In addition, we created the Information Security Handbook in Japanese so that employees can check the rules at any time. We also prepared English and Chinese versions of that Information Security Handbook and distributed them to our local subsidiaries.

Information Security Handbook  
(Japanese)



### ● ISMS Certification of Registration

We have received the external surveillance audit for the ISMS of the department's handling information assets. Our ISMS Information Security Management System was recertified in January 2021 to satisfy and maintain the requirements of ISO/IEC 27001: 2013 and JIS Q 27001: 2014.

We will continue to strengthen our internal information security measures and work to maintain our certification registration.



**ISO/IEC 27001: 2013  
JIS Q 27001: 2014**

Registration Institution (2020):  
British Standards Institution

Registration Number (2020)  
IS 580917

Note: This Registration operates system at the Information System Department and the NAVIS Support Center.

# GRI STANDARDS INDEX

This chart shows the correspondence between the contents of the ESG Report 2021 and the GRI Sustainability Reporting Standards document. The ESG Report 2021 refers to the GRI Sustainability Reporting Standards document.

	Description		Reference	Page
<b>GRI 102: General Disclosures 2016</b>	<b>Organizational profile</b>			
	102-1	Name of the organization	Corporate Profile	p.3
	102-2	Activities, brands, products, and services	Business	p.3
	102-3	Location of headquarters	Corporate Profile	p.3
	102-4	Location of operations	Corporate Profile	p.3
	102-5	Ownership and legal form	Corporate Profile	p.3
	102-6	Markets served	-	-
	102-7	Scale of the organization	Corporate Profile	p.3
	102-8	Information on employees and other workers	-	-
	102-9	Supply chain	Supply Chain Management	p.18
	102-10	Significant changes to the organization and its supply chain	-	-
	102-11	Precautionary Principle or approach	Eco-Friendly Products	p.9
	102-12	External initiatives	Quality Management System (QMS)	p.16
	102-13	Membership of associations	-	-
	<b>Strategy</b>			
	102-14	Statement from senior decision-maker	Message from the President & CEO	p.4
	102-15	Key impacts, risks, and opportunities	Message from the President & CEO	p.4
	<b>Ethics and Integrity</b>			
	102-16	Values, principles, standards, and norms of behavior	NIDEK Corporate Conduct Charter	p.5
	102-17	Mechanisms for advice and concerns about ethics	Compliance System Whistle-blowing System Use of Public Research Funds	p.22 p.22 p.23
	<b>Governance</b>			
	102-18	Governance structure	Corporate Governance System	p.21
	102-19	Delegating authority	Corporate Governance System	p.21
	102-20	Executive-level responsibility for economic, environmental, and social topics	-	-
	102-21	Consulting stakeholders on economic, environmental, and social topics	-	-
	102-22	Composition of the highest governance body and its committees	Corporate Governance System	p.21
	102-23	Chair of the highest governance body	Corporate Governance System	p.21
	102-24	Nominating and selecting the highest governance body	Corporate Governance System	p.21
	102-25	Conflicts of interest	-	-
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