



**OLYMPUS**

**OLYMPUS GLOBAL CODE OF CONDUCT:  
BECAUSE WHAT  
WE DO MATTERS**

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AT OLYMPUS, OUR  
CORPORATE **PHILOSOPHY**  
CONSISTS OF OUR  
**PURPOSE** AND OUR  
**CORE VALUES.**



**Our Purpose** is our reason for being, the culmination of our efforts that motivates us all to come to work every day.

**Our Core Values** are the beliefs and principles we share. These are the elements that best describe the type of company we are and strive to be. Our Behaviors are the expression of Our Core Values through our day-to-day actions. When there is alignment between Our Core Values and Behaviors, our company culture flourishes. At Olympus, Our Core Values, Behaviors and Code of Conduct ensure a common understanding of who we are and what we stand for all over the world.

The Olympus Global Code of Conduct (Olympus Global Code) serves as our guide to ethical and responsible business conduct. What sets Olympus apart is our passion for what we do and our shared standard of excellence.

Today, our business is changing, but Our Core Values remain the same. We know it's not just about what we do but how we do it.

We know the way we work matters because what we do matters.



**STEFAN KAUFMANN**

DIRECTOR, REPRESENTATIVE  
EXECUTIVE OFFICER, PRESIDENT  
AND CHIEF EXECUTIVE OFFICER

# CEO LETTER

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Dear Colleagues,

Through our unwavering commitment to our purpose of making people's lives healthier, safer and more fulfilling, Olympus has evolved into a leading global MedTech company with a focus on innovation and value creation in the healthcare industry. We will continue to evolve Olympus into a more trusted and valued partner, aiming to ensure sustainable growth, and guided by our three strategic key priorities: Patient Safety and Sustainability, Innovation for Growth, and Productivity.

Among these key priorities for our future success, nothing is more critical than Patient Safety, and we must deepen our commitment to the health and safety of patients. Quality, Patient Safety, and compliance with applicable laws and regulations is the responsibility of each one of us. To ensure that Olympus is viewed as a consistent and trustworthy company, with a globally coherent quality mindset and culture of integrity, it is essential that you understand the principles of our Global Code of Conduct (Code).

Our Code explains the behaviors Olympus expects from each one of us in our daily work. Remember, you are a valued member of the Olympus Group, and the decisions you make lay the foundation

for trust with and in our company. I expect you to tackle problems with integrity and work together each day to do what is right. Together we will continue to build and maintain a company that is truly respected and deserving of trust, as we pursue Patient Safety, and demonstrate our Core Value of Integrity in our business dealings as we provide outstanding products and service to our customers around the world.

Our respectful relationship with one another at Olympus, regardless of a colleague's personal characteristics, is a matter that is very important to my own heart. With our Code's guidance, let us also continue to sensitize ourselves and make sure that Olympus provides a safe and respectful workplace for all of us.

Do you have questions about our Code, are you unsure or even have concerns? Please always feel encouraged to consult your manager, the GRC team, the Legal team, or Human Resources. Or use the Olympus Integrity Line.

Let's continue to be a trusted and valued partner in the world. Together.



**Stefan Kaufmann**





## WHY DO WE HAVE A CODE?

To remind ourselves, as our work environment becomes increasingly global and competitive, we must continue to run our businesses with integrity.

Through our work and dedication, each of us contributes to the good reputation of Olympus in society and in the industry. This can only happen if users trust us and our products. We have to earn and renew this trust every day.

## WHO MUST FOLLOW THE CODE?

We are all called upon to take responsibility, to show integrity and to do the right thing. The Code applies equally and without exception to all of us.

We also expect our business partners who act on our behalf to reflect a commitment to integrity consistent with our standards.

Only by combining our success in business with a responsible approach can we meet our objective of developing and offering products that make people's lives healthier, safer and more fulfilling.

## HOW SHOULD I USE THE CODE?

The Olympus Global Code tells us what behavior is appropriate as well as what is right and responsible for our company. It reflects Our Core Values, internal policies, voluntary commitments and principles, and national and international laws.

The Code principles should become a natural part of our work and our actions. We will only remain successful as a company if we all adhere to these basic tenets.

Olympus also has certain regional Codes or policies. We will follow the standards in the Global Code as well as any regional Codes, policies and procedures that apply to our work.

### **Commitment to UN Global Compact**

As an organization, we uphold the 10 principles of the UN Global Compact, including a commitment to support human rights and work against corruption in all forms such as extortion and bribery.

The Olympus Global Code, which aligns with these principles, sets out how we act as a reliable company for our customers, business partners, and other stakeholders.

## WHAT HAPPENS IF SOMEONE VIOLATES THE CODE?

Incorrect behavior by any individual can threaten our relationships with stakeholders. It can break trust with customers and with the public. A violation of the Global Code may be addressed by further education or it can lead to corrective action up to termination. Where a violation of the Global Code is also a violation of law, it may also lead to fines and claims for damages.

IT MATTERS THAT

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WE CREATE  
QUALITY PRODUCTS  
AND SERVICES

# PRODUCT SAFETY, QUALITY AND SECURITY

Olympus stands for high-quality products and services. Our quality management processes and procedures help us comply with international standards and continually improve our products, services and processes. Follow applicable Olympus Quality policies and applicable procedures to continue to maintain and improve the effectiveness of its quality management system in full conformance with regulatory requirements. We want to achieve outstanding customer satisfaction, patient health and safety, and device safety.

## WHAT WE DO:

- Follow internal quality procedures, processes and requirements to help ensure the quality, safety and efficacy of our products and services.
- Comply with good regulatory and clinical practices, if you work with our medical products.
- Completely and accurately report quality testing results – never falsify, change or conceal a finding.
- Report **any** adverse events or potential adverse events or product quality complaints **immediately** to our Quality Assurance department and others required by local regulations.
- Consider cybersecurity and privacy risks management throughout the product development lifecycle.
- Identify product security vulnerabilities and communicate mitigation actions with stakeholders.



## And this matters too:

We treat quality complaints very seriously – including any related to our medical products.

A complaint about patient injury or harm is known as an “Adverse Event or Potential Adverse Event.” These should be reported immediately, without delay.

We must manage any such complaints quickly, putting the patient’s health first.

You should also share any information you learn about product security threats and vulnerabilities.



# DELIVERING INNOVATIVE VALUE

At Olympus, we want to look beyond the present to deliver future value to our customers, patients and stakeholders

## WHAT WE DO:

- Stay aware of trends around the world and pursue business ideas in tune with customer needs and desires.
- Strive to develop and provide safe, high-quality products and services that are meaningful from the customers' perspective.





IT MATTERS THAT

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WE PROVIDE A SAFE  
AND RESPECTFUL  
WORKPLACE

# RESPECTFUL BEHAVIOR

Dignity and mutual respect are at the heart of our interactions with each other, business partners and anyone we encounter in a business setting. We do not allow harassing behavior or discrimination based on personal characteristics like gender, age, nationality, ethnicity, skin color, political views, sexual orientation, religious beliefs, social background or disability. We want a healthy and encouraging work environment. Disrespectful behavior can lead to disciplinary action, up to and including termination.

## WHAT WE DO:

- Treat colleagues, customers and business partners with courtesy, dignity and respect.
- Show appreciation for diversity of people, views and work styles.
- Never discriminate against job candidates or employees.
- Avoid speaking generally about groups, including specific racial, gender, or religious groups.
- Never harass others and speak up if you see harassment take place.



## And this matters too:

What is harassment? We define it as unlawful verbal, physical, or visual behaviors that can be interpreted as personally offensive, impairing morale, and/or interfering with work effectiveness.

Examples of harassment may include:

- racist statements
- religious or sexual jokes
- insulting statements
- offensive posters or cartoons
- intimidation tactics
- offensive language in electronic messages
- the use, display or sharing of pornographic materials

Sexual harassment includes behavior such as asking for sexual favors, sexual advances or sexual jokes or any other behavior of a sexual nature.

It is important to remember that your intent may not matter. Instead, an action, joke or statement that is intended to be non-offensive can still be considered a violation of this Global Code if your co-worker is reasonably offended.

## SAFE AND HEALTHY WORKPLACE

Occupational health and safety is a major priority. We take proactive steps to prevent accidents and occupational illnesses at work. We want our employees to work in an ergonomic and work-friendly environment. At Olympus, we promote good health and wellness.

### WHAT WE DO:

- Use good judgment and act in a manner that is safe for you and others.
- Report safety concerns and work-related injuries or illnesses.
- Never joke about violence and report any violent threats or warning signs from others.
- Comply with applicable health and safety regulations.



IT MATTERS THAT

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WE CONDUCT  
BUSINESS LAWFULLY  
AND ETHICALLY



### **What is a third party?**

In the context of our bribery rules, a third party is any external company, organization or individual, not owned, controlled or employed by an Olympus Group company that we have hired or intend to contract to provide goods or services or engage in business activities with or on behalf of an Olympus Group company.

## **BRIBERY AND CORRUPTION**

We strive to conduct business fairly and with a high level of integrity. We do not tolerate corruption or bribery in our company.

### **WHAT WE DO:**

- Never offer, give or accept bribes or payoffs, either directly or through a third party.
- Avoid even small gifts if they are intended to influence the recipient to provide a service in return.
- Understand that government officials must comply with high legal and moral standards, including some that prohibit gifts and other benefits.
- Follow the Five Principles outlined below.
- Contact the Compliance or Legal departments for support and advice.







## **The Five Principles**

### **01 Separation**

It is not acceptable to influence purchase decisions by awarding inappropriate or illegal benefits. These include invitations to professional training events, meal invitations and gifts. Always follow the relevant guidelines (e.g. value limits) in order to avoid the appearance of attempted influence.

### **02 Transparency**

Our relationships with business partners must be transparent and adhere to all national and local laws, regulations and codes of conduct that apply to the professional groups concerned.

### **03 Equivalence**

If business partners are instructed to provide a service for or on behalf of Olympus, the performance and consideration must be reasonably proportionate and based on the fair market value.

### **04 Documentation**

Our relationships with business partners must be managed and documented in writing in such a way that it is possible to examine and trace communications at all times. This includes recording the nature and purpose of any cooperation as well as the performance and consideration, responsibility for costs and payment and evidence of the services provided (e.g. activity reports, etc.).

### **05 Image and Perception**

Even a legally permissible relationship should always be evaluated critically to consider how it will reflect on Olympus. Public perception is important for both our reputation and our business success.

# GIFTS, MEALS AND ENTERTAINMENT

While exchanging items of modest value can help build business goodwill, we are thoughtful about gifts, meals and entertainment, recognizing their ability to sway judgment.

## WHAT WE DO:

- Follow all gift policies and limits, including local guidelines.
- Never offer gifts, meals or entertainment in an attempt to influence someone's business decisions.
- If you invite business partners to business meals and events, make sure the costs are reasonable and the recipient did not request the invitation.
- Never ask a business contact for a gift.
- Never accept benefits or gifts that could influence – or even appear to influence – your own business decisions.
- Only accept invitations to business meals and events if the financial value is appropriate and the invitations are made only occasionally.
- Be transparent and disclose the gifts and other invitations you receive to your supervisor.
- Follow applicable Olympus Global Rules and regional compliance policies. Specific and strict rules about meals and gifts apply to government officials and in healthcare and life science markets.



## CONFLICTS OF INTEREST

At work, we expect you to disclose any possible conflict between your private interests and the interests of Olympus. This includes if you work with friends or family or hold a financial interest in a company with which we do business. Clearly communicating any possible conflicts can help ensure that there is no actual or perceived influence on business decisions as a result of such collaboration.

### WHAT WE DO:

- Recognize that employees owe a duty of loyalty to the company.
- Watch for conflicts of interest – including situations where others may perceive a conflict.
- Disclose any conflicts of interest that exist when you come to work at Olympus or that may emerge later.
- Work with the company to address and resolve any conflicts. This might involve removing yourself from decision making related to the conflict.



### This matters:

The following situations can lead to conflicts of interest:

- **Financial interests and investments:** For example, you or a relative has an ownership interest in an Olympus supplier, competitor, service provider or customer.
- **Family members and close personal relationships:** For example, you hire, evaluate or manage a family member, close friend or romantic partner.
- **Outside involvements:** For example, you take a political or charitable role outside of work that interferes with the company's best interest or your job duties.

If you think you have a conflict, disclose it by talking to your manager, Compliance or Human Resources. Many conflicts can be addressed and resolved without serious issue.



### And this matters too:

Occasionally employees establish romantic relationships at the workplace. We respect your privacy, and there is no reason to hide a personal relationship within the company.

However, contact either the HR department or your manager if you notice or suspect a conflict at work due to your relationship. Relationships between managers and their employees call for particular sensitivity. The company will work with you, in confidence, to seek a suitable solution.



## FAIR COMPETITION AND BUSINESS INTELLIGENCE

Our business relations are based on free and fair competition. We do not apply unfair business practices, and we adhere to all laws concerning the restriction of competition. Violations of competition or antitrust laws can lead to high fines and penalties for the company and may also apply to employees.

### WHAT WE DO:

- Be extremely careful when communicating with competitors – especially during informal discussions.
- Openly identify yourself as an employee of Olympus.
- Never discuss confidential topics with competitors, such as pricing, business areas, sales volumes or the type and quantity of products sold or produced.
- Never talk to competitors about dividing markets or suggest ruling out business with certain customers.
- Never fix or discuss fixing sales prices with competitors.
- Compete fairly and avoid conduct that constitutes or may appear to be manipulation of a tender or bidding process.

### And this matters too:

We do not make agreements with competitors on topics like:

- prices
- coordinating of bids
- terms or conditions of sale
- research and development plans
- market division or customer allocation
- production volumes

## INTERNATIONAL TRADE

We are required to adhere to import and export laws governing cross-border trade and to play an active role in control measures. This is a complex and technical area – if you are involved in international trade, work closely with Olympus Trade Compliance management.

### WHAT WE DO:

- Recognize controlled products and obtain any required import and export licenses.
- Never export to restricted parties, countries or entities.
- Provide accurate and truthful information to customs and regulatory agencies.
- Comply with applicable trade laws and regulations.

## FINANCIAL INTEGRITY AND FRAUD

At Olympus, we practice transparency at every level and make it a priority to prevent and detect fraud. We know our shareholders require honest and accurate information to evaluate our financial and company performance. We show integrity with our reporting, following all required accounting standards.

### WHAT WE DO:

- Report and record all financial data, including revenue and expense transactions, honestly, accurately, completely and in the proper accounting period.
- Comply with applicable tax laws and regulations.
- Never make false reports or expense claims. Never intentionally record incorrect information or manipulate accounting information or financial statements to secure profits, achieve sales budgets, fulfill budgeted expenses, or for any other reason.
- Follow all reporting and disclosure requirements and cooperate with any internal or external auditors.



### And this matters too:

Money laundering is a serious global problem and a financial crime that touches many businesses. Remain alert to unusual behavior related to financial transactions, such as:

- Evasiveness or a reluctance to provide information
- Incomplete or inconsistent information, such as documents that can't be verified, multiple tax identification numbers or attempts to shield the identity of the people involved
- Requests for unusual money transfers or transactions
- Negative news coverage of an involved individual or company

# MANAGING BUSINESS PARTNERS AND OTHER THIRD PARTIES

We feel responsible for the entire lifecycle of our products — from product design, material sourcing and production to environmental disposal. Any illegal or unethical actions by a business partner can expose us to liability and reputation damage. We carefully evaluate and screen potential third parties and business partners before working with them, and we reserve the right to terminate contracts with companies and individuals whose actions put us at risk.

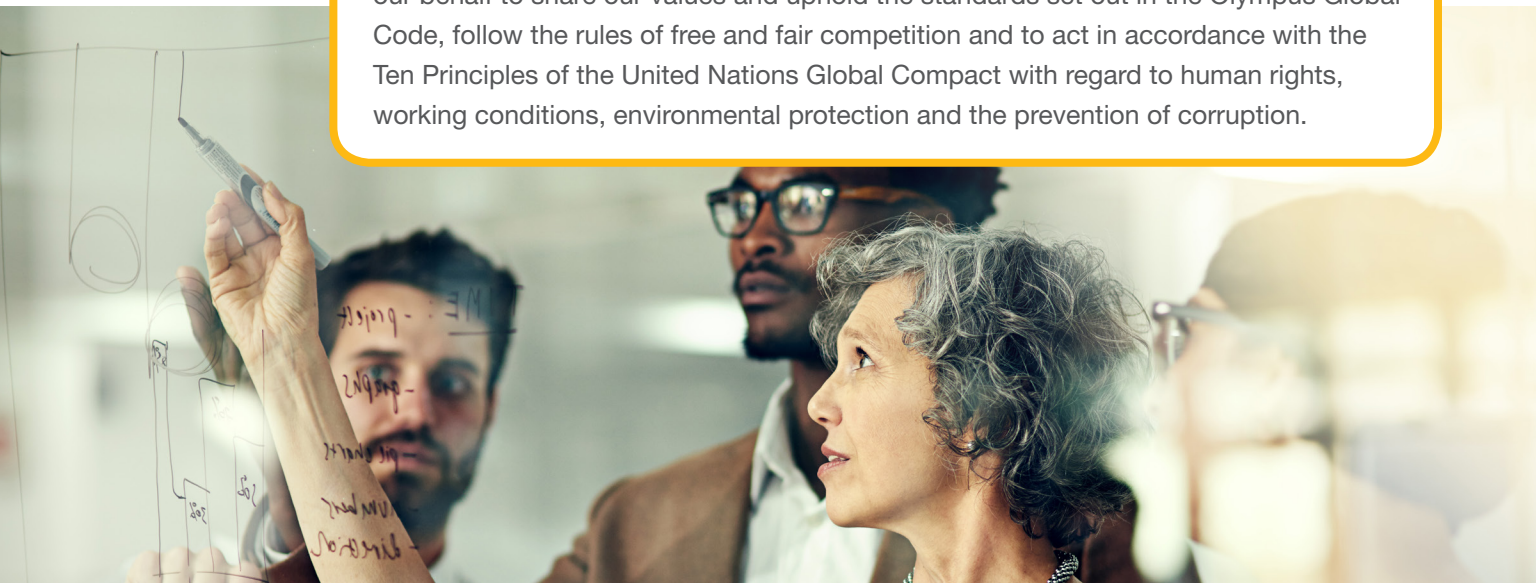
## WHAT WE DO:

- Only work with qualified contractors, business partners and other third parties.
- Screen third parties and potential business partners before engaging in business relationships and re-evaluate existing relationships regularly.
- Require that those who we work with will abide by our requirements related to corruption, bribery and other illegal or inappropriate activities.
- Monitor, and, when possible, secure and exercise the right to audit, the contractors, business partners and other third parties we work with regularly and watch for signs of unethical or illegal actions.



### And this matters too:

We expect our business partners, suppliers, distributors and third parties who act on our behalf to share our values and uphold the standards set out in the Olympus Global Code, follow the rules of free and fair competition and to act in accordance with the Ten Principles of the United Nations Global Compact with regard to human rights, working conditions, environmental protection and the prevention of corruption.



IT MATTERS THAT

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WE PROTECT  
COMPANY ASSETS  
AND INFORMATION

# COMPANY ASSETS AND INFORMATION

We are all responsible for protecting the assets of our company. Customers, suppliers and other parties also entrust their assets to us. We ask you to ensure that any company assets entrusted to you are sufficiently secure.

## WHAT WE DO:

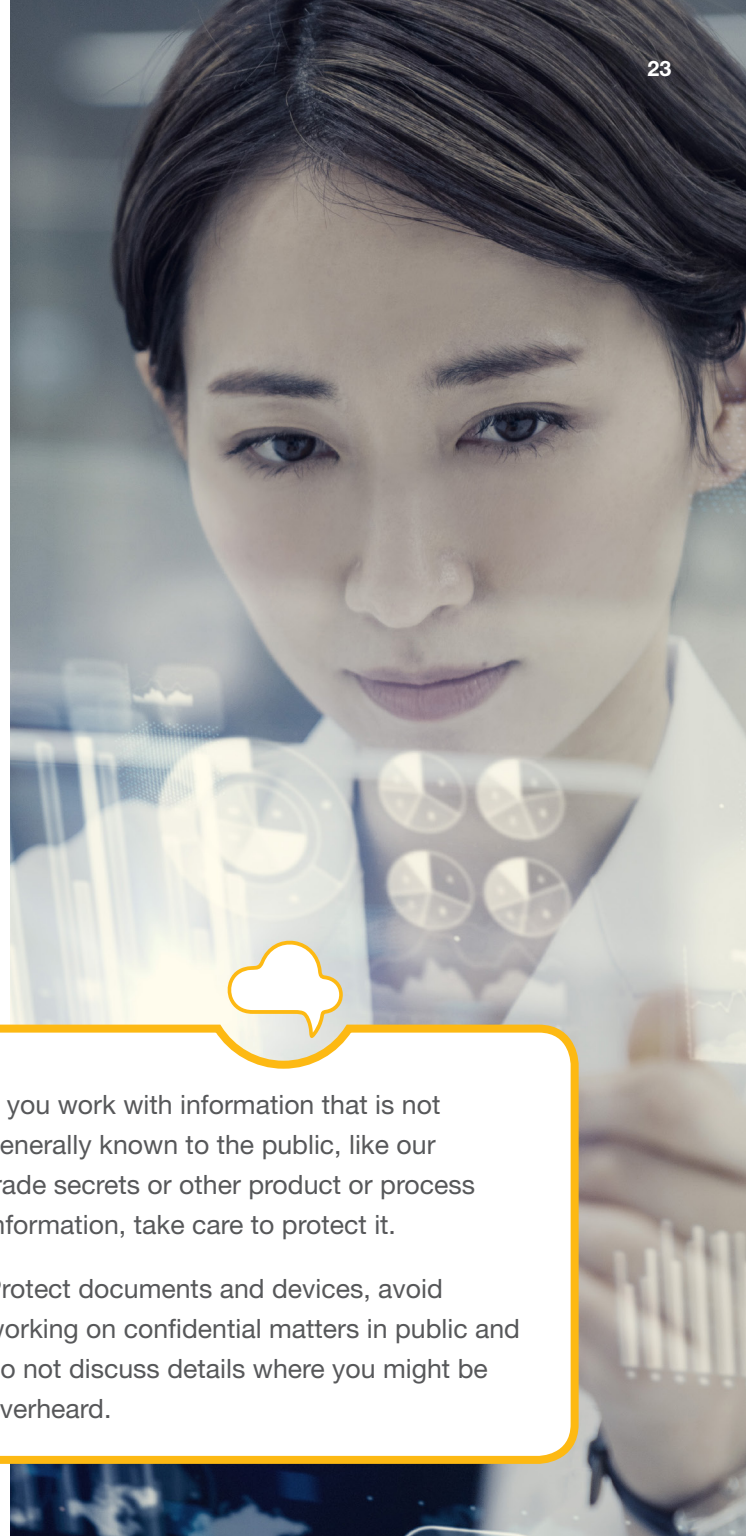
- Only use company resources – for example, capital, personnel, software or work equipment for legitimate business purposes.
- Never take company assets for personal use.
- Take care of material assets, like equipment and buildings.
- Never sell, pledge, loan, transfer or modify our assets in a way that reduces their value, unless you have reasonable business grounds and your manager's approval.

### And this matters too:

Our company's competitive advantage is based on certain confidential and proprietary information, including intellectual property such as product schematics or manufacturing technology. Improperly revealing this information could seriously damage our business.

If you work with information that is not generally known to the public, like our trade secrets or other product or process information, take care to protect it.

Protect documents and devices, avoid working on confidential matters in public and do not discuss details where you might be overheard.







## DATA PROTECTION

Olympus holds a great deal of valuable information on our company networks and servers, some of which is confidential or sensitive. We all share a responsibility to help protect this information and avoid taking actions that could lead to the information being lost, stolen or accidentally disclosed and adopting good cyber hygiene.

### WHAT WE DO:

- Take appropriate measures to protect our computers, devices and company networks.
- Use strong passwords and do not share passwords.
- Store confidential information on authorized company networks and systems.
- Let your manager know if you have access to personal information that you don't need.

## PROTECT DATA PRIVACY

Safeguarding personal information is fundamental to Olympus' commitment to patients, healthcare professionals, external business partners, employees and consumers. We show respect for people's privacy rights by safeguarding personal information about individuals and protecting it from unauthorized or unlawful disclosure or misuse. In addition, we observe all company guidelines and applicable privacy laws when we collect, store, use and share personal information about individuals, whether they are employees, customers or others.

### WHAT WE DO:

- Never access personal information stored on our systems, unless your job requires it and the use is in line with the original purpose for which the information was collected.
- Periodically review the information you hold and discard any personal information you have that you no longer need.

# INSIDER TRADING

It's possible that, in the course of our jobs, we may learn information about Olympus or other companies that is not known to the general public. When this happens, we must avoid trading the stock or other securities of those companies, or tipping others to trade those stocks or securities.

## WHAT WE DO:

- Recognize when you are working with inside information.
- If you have inside information, do not trade company shares or other financial instruments until the information is public.
- Never tell anyone else to trade on the basis of inside information.



## What does inside information look like?

Inside information is any information that might cause a reasonable investor to buy or sell stock or other securities. For instance:

- Unreleased financial results
- Plans to acquire another company
- Planned announcements of new products
- Discussions about making a substantial investment in another company
- A decision to outsource a large volume of business
- Plans to cancel a large supplier's contract



# CAREFUL COMMUNICATIONS AND RECORDS MANAGEMENT

Communicating in written language be it on paper, in electronic documents, in e-mails, or on social media, requires special attention. Statements can be taken out of context and suddenly express something completely different from what the author originally intended. Always communicate professionally, recognizing that it's possible for any communication to be retrieved and read in the future, without the benefit of your intentions or the original context.

## WHAT WE DO:

- Be open and honest – make sure that your communication is always fact-based, objective, transparent, professional and honest.
- Always retain documents as required by company records retention schedules. Never destroy records that are, or could be, relevant to a potential or impending official investigation or court case.
- Never communicate with the media or respond to investor inquiries on the company's behalf unless you are expressly authorized.





IT MATTERS THAT

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WE ACT WITH  
INTEGRITY IN OUR  
INTERACTIONS WITH  
CUSTOMERS,  
BUSINESS PARTNERS  
AND OTHER  
STAKEHOLDERS

# INTERACTIONS WITH HEALTHCARE PROFESSIONALS

Our sales, marketing and promotional efforts for our healthcare and life science products should be focused on patient benefit. We respect the right of healthcare professionals to make the best decisions for their patients, and we will not attempt to improperly influence those decisions.

## WHAT WE DO:

- We never offer or promise something of value to encourage or induce any healthcare professional to purchase or use our products.
- We engage the services of healthcare professionals and organizations only when they are legitimately needed, and documented, and we pay according to fair market value for services rendered.
- We bill accurately and honestly for the use of our products and services.



### And this matters too:

All of our scientific and promotional activities with healthcare professionals and organizations are intended to ensure the effective use of our products and enhance patient care.

Any information provided should be useful, accurate, supported by scientific evidence and presented honestly.



## MANAGING FIELD ASSETS

If we provide demonstration or evaluation units or loan products, we follow all company policies and procedures.

### WHAT WE DO:

- Understand when we can supply an asset to a healthcare professional and in what circumstances it may not be permitted.
- Cooperate with any auditing or monitoring processes.
- Keep track of all assets, and be aware when they must be returned to the company.

## PROMOTING OUR PRODUCTS

Our patients, other stakeholders and the public at large trust us to provide honest and accurate information about our products. We promote our products only in a clear, fair, understandable way and consistent with regulatory requirements.

### WHAT WE DO:

- Communicate all product information truthfully, clearly disclosing risks and benefits.
- Never misstate or omit safety information.
- Use only promotional material that the company has reviewed and approved.
- Follow local regulatory requirements when promoting products.

### **We have a responsibility to the patients who participate in our clinical trials. We must:**

- Communicate honestly about our research so human subjects can make informed decisions about participating.
- Never participate in a clinical trial if we have an interest that could compromise our ability to be objective and fair.
- Publicly disclose all clinical trial information as required by law.

IT MATTERS THAT

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WE ARE A GOOD  
CORPORATE CITIZEN



## SOCIAL RESPONSIBILITY

Olympus regards itself as a citizen in the communities where employees live and work. We will always respect the culture and practices of the countries and regions where the company engages in business. Our Purpose is to make people's lives healthier, safer and more fulfilling – first and foremost through our products, but also through our activities in the community.

### WHAT WE DO:

- Remain mindful of the impact of our decisions on stakeholders and society.
- Strive to develop mutual understanding with people living in the countries and regions where we conduct business.
- Support community projects that reflect our business by donating money or materials to charitable organizations and offering grants to support education, training and professional development.
- Draw on our own skills and expertise to volunteer in society.

## ENVIRONMENT

Conservation of the global environment is our responsibility. We have taken a responsible and conservative approach to using natural resources, employ sustainable technologies whenever possible at our production sites and develop environmentally-friendly products for our customers. We take action to improve our carbon footprint year after year, with the aim of becoming more carbon-neutral in the long term.

### WHAT WE DO:

- Follow applicable environmental laws and regulations, as well as stringent internal standards.
- Whenever possible, avoid use of materials or methods that create environmental or health risks when suitable alternatives are available.
- Save energy and resources, and promote recycling, using renewable sources where possible and optimizing company processes to be more efficient.
- Continuously improve our environmental activities, following our Environmental Management System.

## HUMAN RIGHTS AND FAIR LABOR PRACTICES

In all corporate activities, Olympus will respect all internationally-recognized human rights and will prohibit forced labor, child labor or illegal discrimination. We perform due diligence so we can avoid using suppliers that offer unsafe products and services, violate applicable law, use child workers or forced labor or subject employees to corporal punishment.

### WHAT WE DO:

- Support basic human rights, respect labor laws, and do not use any form of forced, compulsory or child labor.
- Know the signs of human trafficking and forced labor and report any human rights abuse immediately.
- Never work with or encourage, either directly or indirectly, any antisocial forces or organizations that threaten the order and safety of society.



A man with dark hair, wearing a white dress shirt and a red tie, is smiling and talking on a black mobile phone. He is looking upwards and to the right. The background is a bright, modern interior with white structural beams. Overlaid on the left side of the image is the text "ASKING QUESTIONS AND RAISING CONCERNS" in a blue, sans-serif font.

ASKING  
QUESTIONS  
AND RAISING  
CONCERNS

## USE GOOD JUDGMENT AND SEEK ADVICE

No Code can cover every imaginable situation you may encounter. Every decision and situation that you face calls for good personal judgment and thoughtful consideration.

Be prepared to question yourself and your actions. If you are in any doubt, seek help from others and take advice. You can get in touch with the contacts named in this document or your Compliance Department at any time.







## WHAT IF I DON'T FIND AN ANSWER IN THE CODE?

The guidelines contained in the Olympus Global Code are not exhaustive. There are also national specifications and internal operating procedures that apply to your individual area.

If you're not sure how the Code or another standard applies, ask yourself these six questions:

### **Do I have sufficient information?**

It is better to ask for more details than to know too little.

### **What do the Olympus guidelines say about how I should behave?**

If you are unable to find any applicable information, the Compliance Department will be happy to help you find the guidelines.

### **Do I have a bad feeling about the decision?**

If so, reflect on why you feel that way. Your gut feeling is often an important indicator.

### **Would I have any concerns about justifying my decision to management?**

This may be the case if your decision is not in line with our expectations in terms of ethical behavior.

### **Could I explain the situation to my friends and family?**

Most of the people we know in private wish us well in life, but they are not directly related to Olympus. Imagine telling these people about the situation. What advice would they offer?

### **What would happen if my situation were discussed in the media?**

It is often not only a question of right or wrong, it also matters what impression others may have of a situation. Always ask yourself how a situation would be regarded and judged by a third party.

## RECOGNIZE AND RESPOND TO INCORRECT BEHAVIOR

We are open when dealing with mistakes. Be transparent with the company and seek assistance if you make a mistake or witness the mistakes of others. Only by discussing problems can we find solutions and improve as a team.

Everyone is required to report illegal behavior by employees, managers, suppliers and business partners, for example, in case of financial fraud or violations of competition law. We understand it is not always easy to raise concerns about possible misconduct, and we encourage you to come forward and report any concern to the Compliance Department, your Manager, Human Resources, or the Legal Department or to the Integrity Line.

By speaking up, you will help prevent damage to Olympus.

## ACT TO CREATE TRUST

Olympus has been living an open-door policy for years. Share your concerns. Taking action to protect our values is always right and appreciated at Olympus.

We do not tolerate discrimination or retaliation against individuals who report their concerns or take part in an investigation in good faith – even if insufficient evidence is found to confirm a legitimate concern.

If you seek advice or identify incorrect behavior, you do not have to deal with the situation alone.

### Colleagues

One of your colleagues may have been in a similar situation before. Talk openly about your concerns and seek advice.

### Management

Your manager is there to support you at work. This includes providing advice in relation to the Olympus Global Code and following up on your concerns.

## Compliance

If you have any questions or concerns about the Olympus Global Code, our colleagues in the Compliance Department will be pleased to help. Of course, we will respect the confidential nature of your inquiries and reports.

### Global Integrity Line

The Integrity Line is a service offered by an independent company, available 24 hours a day, 365 days a year. All reports are treated as confidential and are investigated appropriately.

The Integrity Line is available to all employees, business partners and other parties who would like to report a possible violation of the Olympus Global Code.

Your Integrity Line call or website inquiry cannot be traced. You may be able to remain anonymous when making a report, to the extent possible by local law.





**SPEAK UP: OLYMPUS INTEGRITY LINE**

[OLYMPUS.ETHICSPPOINT.COM](https://olympus.ethicspoint.com)

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