

OLYMPUS

A group of four diverse business professionals (two men and two women) are seated around a table in a bright, modern office setting. They are all smiling and clapping their hands, suggesting a successful meeting or presentation. The woman in the foreground is wearing a white blouse and a watch, and is clapping enthusiastically. The man next to her is wearing a light blue shirt and a dark tie. The woman on the far right is wearing a light pink blouse. The man on the far left is wearing a light blue shirt and a tie. A glass of water is visible on the table in front of the woman on the left.

**OLYMPUS GLOBAL
THIRD PARTY CODE**

TABLE OF CONTENTS

INTRODUCTION	3
Our Purpose and Our Core Values	
SECTION 1	4
It Matters that We Create Quality Products and Services	
SECTION 2	5
It Matters to Provide a Safe, Inclusive, and Respectful Workplace	
SECTION 3	6-8
It Matters that We Conduct Business Lawfully and Ethically	
SECTION 4	9
It Matters that We Protect Company Information	
SECTION 5	10
It Matters that We Act with Integrity in Our Interactions with Customers, Business Partners, and Other Stakeholders	
SECTION 6	11
It Matters that We Are Good Corporate Citizens	
ASKING QUESTIONS AND RAISING CONCERNS	12
OLYMPUS INTEGRITY LINE	13

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

Third Parties

Any company, organization or individual not owned, or controlled or employed by or acting as executive for Olympus that is or is intended to be contracted to provide goods or services or engage in business activities with or on behalf of Olympus.

Olympus Corporation, including our subsidiaries, business groups, divisions, and operating entities (together “Olympus”), has adopted the Olympus Global Code of Conduct (“Olympus Global Code”), which incorporates our Corporate Philosophy consisting of [Our Purpose and Our Core Values](#).

We expect our **third parties** to share our values, follow the rules of free and fair competition and to act in accordance with the Ten Principles of the United Nations Global Compact. We also expect our third parties to act in accordance with UN Guiding Principles on Business and Human Rights, regarding human rights, working conditions, environmental protection, and the prevention of corruption.

The Olympus Global Third Party Code (“Third Party Code”) has been designed to provide guidance to our third parties on the fundamental values, principles, and standards of behavior which Olympus expects whenever a third party is engaged by or on behalf of the Olympus Group. We consider our third parties to be our partners in business and we expect the same high standard of integrity from them that we expect from our employees and managers.



IT MATTERS THAT 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 requirements. We continually improve our products, services, and processes to achieve outstanding customer satisfaction, patient health and safety, and device safety.

WHAT WE EXPECT:

- Follow required quality procedures, processes, and standards to help ensure the quality, safety and efficacy of our products and services.
- Report **any** adverse events or potential adverse events or product quality complaints **immediately** to our Quality Assurance department and others as required by local regulations.

IT MATTERS TO PROVIDE A SAFE, INCLUSIVE, AND RESPECTFUL WORKPLACE.

RESPECTFUL BEHAVIOR

Dignity and mutual respect are at the heart of our interactions with each other, with our third parties and with anyone we encounter in a business setting. We do not allow harassing behavior or discrimination based on personal characteristics and/or physical attributes like gender, age, nationality, ethnicity, skin color, disability, political views, sexual orientation, religious beliefs, or social background.

WHAT WE EXPECT:

- Treat everyone with courtesy, dignity, and respect.
- Use good judgment and comply with applicable health and safety regulations.
- Value a diverse and inclusive workforce.





IT MATTERS THAT WE CONDUCT BUSINESS LAWFULLY AND ETHICALLY.

BRIBERY AND CORRUPTION

We strive to conduct business fairly and with integrity. We do not tolerate any kind of corruption or bribery by our employees, contractors, or any other third parties engaged or acting on our behalf.

WHAT WE EXPECT:

- Conduct business lawfully and never by offering, authorizing, or giving any bribe, kickback, or other illicit payment or benefit to improperly induce or reward a customer or to obtain or retain business.
- Never offer gifts, meals, or entertainment in an attempt to improperly influence someone's business decisions.
- Follow all applicable requirements and procedures and manage assets appropriately if you provide demonstration or evaluation units or loan products.
- Speak up in case of concerns and contact the Olympus Integrity Line at olympus.ethicspoint.com

IT MATTERS THAT WE CONDUCT BUSINESS LAWFULLY AND ETHICALLY (CONT).

CONFLICTS OF INTEREST

Disclose existing, potential or perceived Conflicts of Interest that may exist when you enter into a business relationship with Olympus or when such conflicts emerge. Clearly communicating any possible conflicts can help ensure that there is no actual or perceived influence on business decisions.

WHAT WE EXPECT:

- Disclose any actual or potential conflicts of interest that exist when you enter into a business relationship with Olympus or when such conflicts of interest emerge.

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 competition laws. Violations of competition/antitrust laws can lead to high fines and penalties for the company and for individuals.

WHAT WE EXPECT:

- Never disclose sensitive information or 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 unduly influencing or fixing prices or dividing markets. Never improperly suggest ruling out business with certain customers.
- Never ask a potential customer for pricing or other selling terms put forward by our competitors.
- Compete fairly and avoid conduct that constitutes or may appear to be manipulation of a tender or bidding process.

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 your Olympus representative.

WHAT WE EXPECT:

- Recognize controlled products and obtain all 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.

IT MATTERS THAT WE CONDUCT BUSINESS LAWFULLY AND ETHICALLY (CONT).

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.

WHAT WE EXPECT:

- Adhere to applicable accounting standards and maintain complete and accurate accounting books and records.
- Comply with applicable tax laws and regulations.
- Never make false reports or claims. Never intentionally record incorrect information or manipulate accounting information or financial statements.

MANAGING THIRD PARTIES

Any illegal or unethical actions by our third parties can expose us to liability and reputational damage. We expect that our third parties will carefully evaluate and screen their potential third parties before working with them, and we reserve the right to terminate contracts with companies and individuals whose actions may put us at risk.

WHAT WE EXPECT:

- 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 those that work with Olympus to understand this Third Party Code and to abide by our requirements related to corruption, bribery and other illegal or inappropriate activities.





IT MATTERS THAT WE PROTECT COMPANY INFORMATION.

PROTECT DATA PRIVACY

Safeguarding personal information is fundamental to Olympus' commitment to patients, healthcare professionals, 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 expect our third parties to observe all requirements and applicable data protection and privacy laws when you collect, store, use and share personal information about individuals.

WHAT WE EXPECT:

- Never access or use protected personal information stored on Olympus equipment or systems, unless the services that you provide to Olympus require it and such access or use is in line with the original purpose for which the information was collected.
- Periodically review the Olympus-related information you create or hold and lawfully destroy or dispose of any personal information that you no longer need. Adhere to all applicable data and document retention requirements.
- Follow all applicable laws and regulations regarding data protection.
- In case of an incident involving personal data immediately involve your local data protection and information security teams.

IT MATTERS THAT WE ACT WITH INTEGRITY IN OUR INTERACTIONS WITH CUSTOMERS, BUSINESS PARTNERS, AND OTHER STAKEHOLDERS.

INTERACTIONS WITH HEALTHCARE PROFESSIONALS

Olympus sales, marketing and promotional efforts for healthcare and life science products are and must be focused on patient benefit. We expect that our third parties will respect the right of healthcare professionals to make the best decisions for their patients. Do not attempt to improperly influence those decisions.

WHAT WE EXPECT:

- Never offer or promise something of value to encourage or induce any healthcare professional to purchase or use our products.
- Only engage the services of healthcare professionals and organizations when they are legitimately needed, authorized, documented, and paid for according to fair market value for services rendered.
- Only provide information about Olympus products that is useful, accurate, supported by scientific evidence and presented honestly.

PROMOTING OLYMPUS PRODUCTS

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

WHAT WE EXPECT:

- Communicate all product information truthfully, clearly disclosing risks and benefits and never misstating, or omitting safety information.
- Use only promotional material that Olympus has expressly authorized.
- Follow local regulatory requirements when promoting products.



IT MATTERS THAT WE ARE GOOD CORPORATE CITIZENS.

ENVIRONMENT

Conservation of the global environment is our responsibility. Together, we shall engage in responsible waste management and responsible use of natural resources.

WHAT WE EXPECT:

- We expect that our third parties will operate in an environmentally responsible manner to minimize adverse impacts on the environment.
- Follow applicable environmental laws and regulations.

HUMAN RIGHTS AND FAIR LABOR PRACTICES

In all corporate activities, Olympus will respect human rights and will prohibit forced labor, child labor or illegal discrimination. We strive to avoid using suppliers that do not follow those principles.

WHAT WE EXPECT:

- Follow and support basic human rights, respect labor laws, and do not use any form of forced, compulsory or child labor.
- Act in accordance with the Ten Principles of the United Nations Global Compact, and the UN Guiding Principles on Business and Human Rights.
- Recognize 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.



ASKING QUESTIONS AND RAISING CONCERNS.



Use Good Judgment and Seek Advice

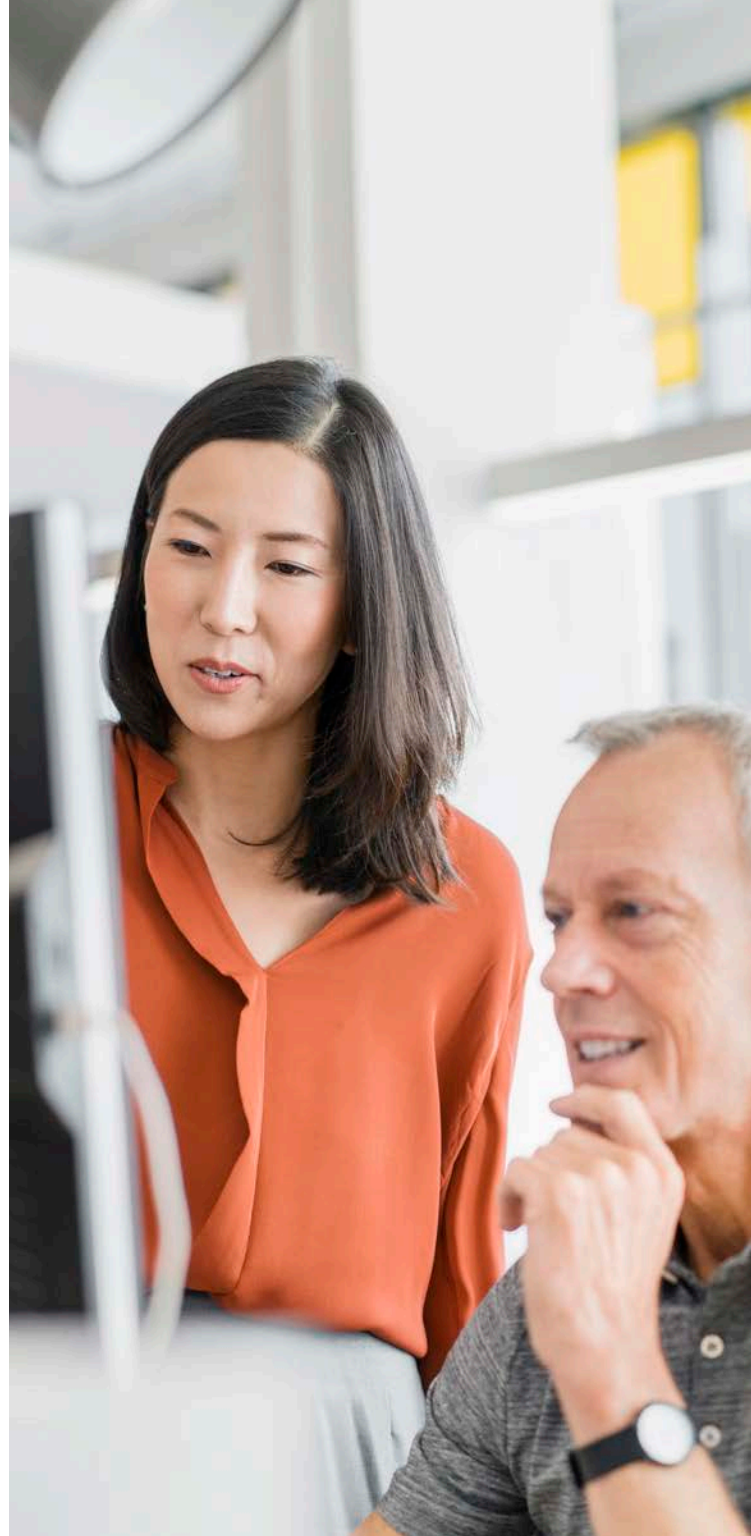
The guidelines contained in this Third Party Code are not exhaustive. If you are not sure how this Third Party Code or another standard applies, ask questions and seek advice.

Recognize and Respond to Incorrect Behavior

Be transparent with Olympus and seek immediate assistance if you make a mistake or witness the mistakes of others.

Everyone is required to report illegal behavior. 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 Olympus. You can contact your Olympus representative, or the Integrity Line.

Olympus does not tolerate discrimination or retaliation against individuals who, acting in good faith, report their concerns or take part in an investigation – even if in the end there is insufficient evidence to confirm a legitimate complaint or concern.



OLYMPUS INTEGRITY LINE

The Olympus Integrity Line at www.olympus.ethicspoint.com is a service offered by an independent company. It is available 24 hours a day, 365 days a year. All reports are treated confidentially and are investigated appropriately.

The Olympus Integrity Line is available to all employees and third parties who would like to report a possible violation. Your Integrity Line call or website inquiry cannot be traced. You will 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)