

OLYMPUS Global Artificial Intelligence Policy

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Chapter 1 General Provisions

Article1: Purpose

This Global Artificial Intelligence Policy OGR contains Olympus' rules for the development, and deployment of AI Systems globally.

Article2: Scope of Application

This Global Artificial Intelligence Policy OGR applies to Olympus Group entities, all Olympus directors, officers, executives, managers and employees, as well as contractors involved in the development, deployment, or management of AI Systems, including the use of AI Tools in product development.

Article3: Definition of Terms

a) Artificial Intelligence (AI)

Refers to any machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

b) AI Tool

A piece of software or machinery developed and/or deployed by Olympus that incorporates AI (and is not an AI Product).

c) AI Product

An Olympus product (medical or non-medical) that incorporates AI (and is not an AI Tool).

d) AI System

An AI Tool or AI Product.

e) AI Use Case

A set of specific problems, tasks, procedures or other processes where AI is used to create value, improve outcomes, or make processes more effective.

f) AI Risks

Specific risks that arise out of the development, deployment, and use of AI Systems.

g) AI Principles

Principles based on the Olympus Core Values that represent Olympus' approach to Artificial Intelligence as a technology and to the specific AI Risks that come with it.

h) AI Governance

A compliance framework that manages AI Risks by ensuring the ethical and responsible development and deployment of AI Tools, including their use in product development, and the development of AI Products.

i) AI Governance & Data Compliance Center of Excellence (AI Governance CoE)

Responsible team that oversees the creation and implementation of AI Governance.

Chapter 2 Olympus' AI Governance Framework

Article4: AI Risks

Artificial Intelligence introduces unique risks and intensifies existing risks. The purpose of this policy and of AI Governance is to identify and mitigate these risks appropriately.

AI Risks include, in particular:

- Inaccurate & harmful output risks, including hallucinations of generative AI applications or inaccurate output of other AI Systems, bias, obscene or inappropriate content;
- Confidentiality & copyright risks, including misuse of input for training of fine-tuning models by third parties, data exfiltration, or output that contains third-party copyright, copyleft or content that risks copyright infringement;
- Privacy & cybersecurity risks, including monitoring of input or output by third parties, prompt injection, or data poisoning attacks;
- Human-AI interaction risks, including lack of transparency, overreliance by users (automation bias), replacement of human agents, and lack of human oversight.

Article5: Olympus AI Principles

To effectively mitigate AI Risks, Olympus is committed to adhering to the following AI principles. They guide Olympus' approach to AI Systems and represent an extension of the Olympus Core Values.

5.1: Patient-Focused and Beneficial Use of Artificial Intelligence

Olympus aims to align the use of Artificial Intelligence with its mission to enhance patient safety and health outcomes and improve the quality of healthcare delivery. The application of AI Systems should be driven by the goal of ultimately benefiting patients and healthcare providers. Olympus strives to engage relevant stakeholders as necessary to achieve this goal.

Core Values: Patient Focus, Innovation, Impact, Empathy

We **DO**: Design and deploy AI Systems with the primary objective of improving patient outcomes and healthcare delivery.

We **DON'T**: Develop or deploy AI Systems in ways that prioritize commercial interests over patient health or compromise the quality of healthcare provided or patient safety.

5.2: Safety, Effectiveness, and Compliance

Being a major medical manufacturer brings with it significant patient safety and compliance responsibilities. We are committed to developing AI Products and deploying AI Tools that meet the relevant standards of quality, safety and effectiveness and adhere to relevant global regulations. This includes rigorous testing and continuous monitoring. We will employ best practices in machine learning and data science to ensure the reliability and security of our AI Products and

deployed AI Tools.

Core Values: Integrity, Empathy

We **DO**: Develop and deploy AI Systems that meet the high standards of quality, safety, and effectiveness and are compliant with applicable regulations.

We **DON'T**: Tolerate the use of AI Systems that have not been adequately validated or that pose unresolved risks to patient safety or regulatory compliance.

5.3: Fairness, Non-Discrimination, and Equity

We will actively work to identify, examine, prevent and mitigate possible biases in our AI Products. Olympus AI Products must be developed and deployed in ways that promote fairness and do not contribute to health disparities. Data used in AI Products and, where possible, deployed AI Tools, should be representative of diverse populations and demographic groups to ensure equitable outcomes.

Core Values: Integrity, Empathy

We **DO**: Ensure that training, validation and testing data sets are relevant, sufficiently representative, and to the best extent possible, free of errors and complete in view of the intended purpose of the specific AI Products.

We **DON'T**: Develop or deploy AI Systems that demonstrated to provide biased outcomes that could create or worsen disparities across different patient populations or our employees

5.4: Transparency, Explainability, and Accountability

AI Systems will be developed and used in a way that allows for appropriate traceability and explainability, while making users aware that they communicate or interact with an AI System. We are committed to providing comprehensive information to all relevant stakeholders about capabilities and limitations of AI Systems. Relevant controls mechanisms will be in place to ensure that any negative impacts of our AI Systems are identified and addressed.

Core Values: Integrity, Impact, Empathy

We **DO**: Ensure that our AI Systems are developed and used in a way that allows for appropriate traceability and explainability and that a control framework is in place to identify and address any negative impacts.

We **DON'T**: Develop or deploy AI Systems that do not provide appropriate transparency and therefore, do not support informed decision making by the AI Systems' deployers or

where there is no clear accountability framework for addressing problems

5.5: Privacy and Security

Protecting patient and employee data is paramount. We will ensure that our AI Systems comply with relevant data protection laws and best practices. AI Products will be designed to secure personal data and respect privacy rights. When deploying AI Tools, we will protect confidential company and third-party information and aspire not to infringe upon the intellectual property rights or legitimate confidentiality obligations of our partners.

Core Values: Patient Focus, Integrity, Empathy

We **DO**: Design and deploy AI Systems with robust security measures that protect personal data, respect privacy rights, and safeguard confidential information in accordance with applicable data protection laws and best practices.

We **DON'T**: Use AI Systems that compromise personal data, violate applicable data protection regulations, or risk exposing confidential information

5.6: Continuous Monitoring throughout the AI System Life Cycle

Artificial Intelligence as a technology is constantly evolving, and so must our practices. We commit to regularly reviewing and addressing experience gained from the use of our AI Systems in real-life settings throughout the entire life cycle. Such experience includes but is not limited to user feedback, enrichment of data sets as well as advancements in technology. Olympus is committed to updating its ethical standards to reflect new developments in AI research and societal expectations.

Core Values: Innovation, Impact

We **DO**: Ensure proper post-market monitoring of our AI Systems' performance in real-life setting along the entire life cycle of the AI System including cooperation with relevant actors along the AI value chain. Special emphasis is put on designing transparency and the control of bias into the AI System to ensure its safety and effectiveness.

We **DON'T**: ignore emerging developments in AI technology, user feedback, and ethical considerations that could enhance system performance and trustworthiness

Article6: AI Governance

To effectively mitigate AI Risks and implement the AI Principles, Olympus creates and maintains an AI Governance program.

This compliance framework ensures the ethical and responsible development and deployment of AI Systems and ensures that AI Systems are aligned with legal, regulatory, compliance and other applicable requirements.

The AI Governance & Data Compliance Center of Excellence (AI Governance CoE), as directed by the Chief Compliance Officer and Head of GRC, is responsible for overseeing the creation, implementation, and maintenance of the AI Governance program.

The basic rules of the AI Governance program for AI Tools (Article 7) and AI Products (Article 8) are laid out below.

Article7: Basic Requirements for Developing, Deploying and Using AI Tools

Olympus observes the following principles when developing, deploying and using AI Tools:

- Olympus implements human oversight measures in the deployment and evaluation of AI Tools, ensuring that humans can always intervene to correct or stop the AI Tools when necessary.
- Olympus does not use AI Tools to automatically evaluate or discipline workers in ways that violate their privacy, autonomy, or dignity. We ensure human oversight is present in these processes, providing workers the opportunity to address concerns.
- Olympus provides adequate transparency about AI Tools.
- Olympus protects the personal data of workers, customers, partners, and other stakeholders when deploying AI Tools. The development, deployment and use of AI Tools must follow OGR-32-001-00 (Global Privacy Policy).
- Olympus protects confidential information when deploying AI Tools. The development, deployment and use of AI Tools must follow OGR-29-010-00 (Confidential Information Management Rules).

7.1 Guidance on AI Tools Usage

The AI Governance CoE publishes guidance on how to comply with these requirements and the Olympus AI Principles in practice.

7.2 List of Approved AI Tools

The AI Governance CoE maintains and published a list of AI Tools that have been evaluated and approved for use by Olympus employees.

When using AI Tools for official business, with Olympus information, or on Olympus IT systems, employees must only use the AI Tools listed there and adhere to the restrictions and requirement for the respective AI Tool.

7.3 Overview of AI Use Cases

The AI Governance CoE maintains and publishes an overview of AI Use Cases that have been evaluated against applicable AI Risks.

This overview of AI Use Cases also outlines generally permissible, “High-Risk”, and impermissible AI Use Cases:

- **Permissible AI Use Cases** may be utilized by any employee with any approved AI Tool, while observing the restrictions and requirements for that AI Tool.

Examples: Brainstorming, text summary or translation, document or email drafting.

- **“High-Risk” AI Use Cases** may only be utilized by specialized employees with specially designed and approved AI Tools, in alignment with the AI Governance CoE.

Examples: Using AI Tools to develop AI Products, code generation, legal review, human resource tasks, biometrics.

- **Impermissible AI Use Cases** may never be utilized by any employee for any reason, and include the following:
 - Emotion recognition (except for medical/safety purposes)
 - Biometric categorization using sensitive characteristics
 - Subliminal manipulation that can cause physical or psychological harm through unconscious influence
 - Exploiting vulnerabilities of specific groups through behavioral manipulation
 - General-purpose social scoring based on social behavior or personality
 - Individual crime prediction based on personality profiling

Article8: Basic Requirements for Developing AI Products

Olympus involves relevant internal and external stakeholders, as necessary, in the relevant stages of the AI Product lifecycle, from conception to deployment and maintenance.

Olympus maintains a post-market monitoring system to monitor the operation and performance of AI Products by collecting, documenting and analyzing relevant data which may be provided by users of Olympus' AI Products or other relevant information throughout the AI Product lifetime.

Olympus will establish and maintain a Risk Management System to identify and address known and reasonably foreseeable risks for its AI Products and throughout their lifecycle. This system will be adapted as necessary based on post-market monitoring.

- Olympus implements and maintains a Data & Data Governance framework that ensures relevant data quality aspects and data privacy. Olympus ensures that training, validation and testing data sets are relevant, sufficiently representative, and to the best extent possible, free of errors and complete in view of the AI Product's intended purpose.

- Olympus maintains a Quality Management System to ensure continuous improvement and compliance with evolving regulatory requirements for AI Products.
- Olympus ensures record-keeping practices to monitor the AI Products' operation and to facilitate post-marketing monitoring during the AI Product lifecycle.
- Olympus commits to transparency in AI Product development, communicating the purposes, capabilities, and limitations of its AI Products sufficiently to relevant stakeholders.
- Olympus incorporates human oversight mechanisms, where feasible, to monitor AI Products and to enable users to intervene when necessary
- Olympus enables its customers and other stakeholders to use Olympus AI Products responsibly by providing adequate education and resources.

Article9: Non-Compliance

Failure to follow the Olympus AI Principles can have serious consequences for Olympus and our stakeholders. Here are some potential outcomes:

- **Loss of Trust**

A violation of the Olympus AI Principles can lead to losing trust by customers, the public, or other stakeholders. This can damage our reputation and make it more difficult to maintain relationships with stakeholders.

- **Legal Penalties**

If a violation of the Olympus AI Principles also violates the law, it may lead to fines and claims for damages. This can result in significant financial losses for Olympus as well as a compounded loss of trust.

- **Disciplinary Action**

We promptly respond to potential violations of this Policy and corresponding Procedures, and we will take disciplinary action as appropriate according to applicable laws and regulations. While each situation will be considered on a case-by-case basis, we are committed to taking consistent and appropriate actions to address inappropriate conduct, including violations of this Policy, and to deter future violations.