

Compliance

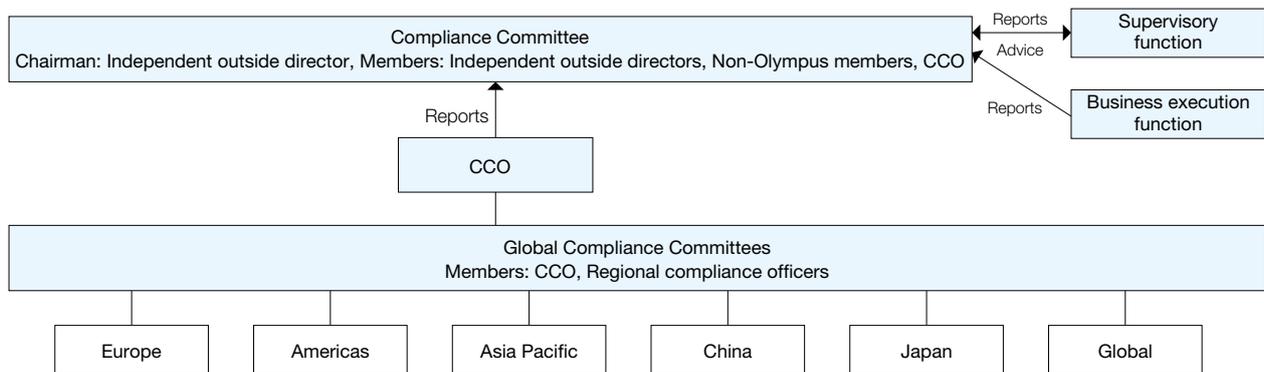
Promotion of Compliance

The Olympus Group strives to foster an environment within the organization in which no concern pertaining to compliance will be ignored, under any circumstances. At the same time, it maintains an understanding of the status of compliance systems and works to strengthen these systems. Realizing the immense responsibilities of the Company's Medical Business due to its provision of products related directly to people's lives, Olympus is committed to maintaining impeccable levels of product safety and quality. The Company has also established its own internal rules to ensure compliance with the various regulations in place in countries worldwide, and it is promoting awareness and conducting training with regard to these rules.

Compliance Promotion Structure

Olympus has appointed a chief compliance officer (CCO) whose task is to clarify compliance-related responsibilities as a global compliance supervisor. We have also established the Compliance Committee, chaired by an independent outside director and consisting of the CCO and non-Olympus members, as the advisory body to the Board. In addition, Olympus has established the Global Compliance Committee to be held on a quarterly basis for compliance officers from each regional headquarters worldwide. The purpose of these committees is to implement compliance-related policies and measures, identify issues, and enforce countermeasures as required, both globally and regionally.

Compliance Promotion System (As of June 30, 2019)



Whistleblowing System

The Olympus Group has established a Compliance Helpline with internal and external contact offices to enable consultation and reporting on compliance-related issues. It has been specified in internal rules that anyone may use the helplines anonymously, the confidentiality of the information will be upheld, and it is prohibited to treat the whistleblower

prejudicially. In April 2019, Olympus launched the Global Whistleblowing Desk "Integrity Line" to complement its existing Compliance Helpline. The Integrity Line is operated by outside parties and firm, thereby ensuring confidentiality. Anonymous whistleblowing is also possible with this line except in countries where this is not permitted by law.

Compliance Training

In order to raise compliance awareness and encourage an understanding of important laws and internal rules, as well as to ensure consistent compliance with them, Olympus is enhancing its compliance training. In Japan, departments responsible for promotion conduct training programs for various individuals using optimal tools. In addition, departments responsible for

ensuring compliance with important laws conduct training programs by selecting course participants and training methods in accordance with the characteristics of applicable laws. In other regions, we undertake compliance training in a systematic manner at each regional headquarters.