

Compliance

Promotion of Compliance

The Olympus Group strives to foster an environment of integrity and compliance within the organization. The new Olympus Global Code of Conduct was adopted in September 2019, and sets forth the expectations of the Company. It is available on the Olympus website in 18 languages. More details are available on the website below.

Olympus Global Code of Conduct

<https://www.olympus-global.com/company/philosophy/code.html>

Compliance Promotion Structure

Olympus has appointed a chief compliance officer (CCO), reporting to the CEO, whose task is to lead the program in accordance with global standards with high expectations of integrity. The Audit Committee of the Board of Directors, consisting of the outside directors, provides independent oversight. Olympus has established the Global Compliance Leadership Team, chaired by the CCO where Regional Compliance Officers and Global Compliance Department leaders participate. The purpose of the group is to implement compliance-policies and measures, share best practices and engage in continuous improvement both globally and regionally.

Compliance Promotion System (As of July 31, 2020)



Disclosure Program (Whistleblowing System)

The Olympus Group has established a Global Integrity Line which permits and encourages reporters to raise concerns through the web or by phone. The Integrity Line is operated by a third party, thereby ensuring anonymity if sought by the reporter (in accordance with local law). This resource complements a range of regional “helplines”, all designed to encourage the raising of concerns. Olympus is committed to assuring that good faith reporters are not the subject of retaliation.

Compliance Training

To raise compliance awareness and encourage an understanding of important laws and internal rules, as well as to ensure consistent compliance with them, we must give our employees the appropriate training. Olympus continues to enhance its compliance training and strives to integrate compliance principles into everyday business process and communications, with the goal of aligning business objectives with doing the right thing in order to maintain the trust of our stakeholders. We require employees and managers to complete compliance-related training courses regarding topics such as anti-corruption and fair competition. In Japan, for example, training programs for employees are tailored to their areas of responsibility and related compliance risk. In other regions, we undertake compliance training in a similar systematic manner.