

## Aligned Assurance

The business performance of Olympus Group may be materially affected by various risks (uncertainties) that could occur in the future. Olympus Group has established a comprehensive global Enterprise Risk Management framework to facilitate the attainment of its strategic business objectives, which framework encompass, among other aspects, Olympus' corporate philosophy and Guiding Principles. The Enterprise Risk Management structure implemented by Olympus Group is based on and operates in accordance with "the Company's formalized" "Policy of Risk Management & Crisis Response." Olympus Group is undertaking Enterprise Risk Management from the perspective of both opportunities and threats. Opportunities are seized through active and appropriate "risk taking, leading" to sustainable growth and value creation for Olympus Group. Threats are identified, prioritized, and addressed to ensure the achievement of business objectives and to prevent non-compliance.

The elements of the enhanced Enterprise Risk Management System are:

- A global Risk & Controls organization embedded into the LRC (Legal, Risk and Compliance) function
- An enhanced global Enterprise Risk Management methodology and approach
- A globally harmonized Enterprise Risk Management process

Those three elements aim to ensure a streamlined Enterprise Risk Management program that feeds into business and financial planning and safeguards the achievement of Olympus' business objectives and its delete company strategy by supporting informed decision making.

Further building on the global Enterprise Risk Management Portfolio for fiscal year 2024, Olympus conducted Risk Assessments with all relevant functions during the fiscal year 2025, to validate and update Olympus' regional and global Risk Portfolio.

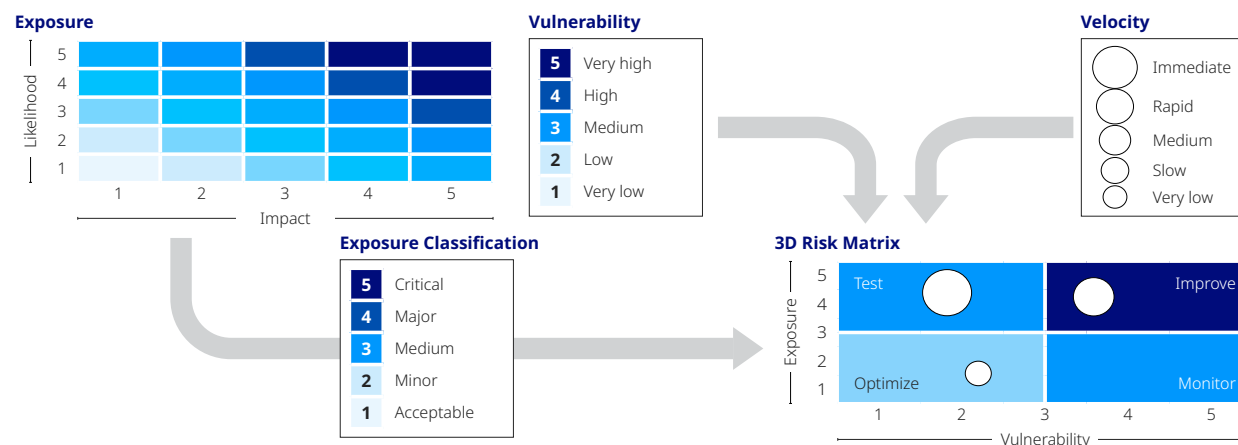
### Enterprise Risk Management Methodology and Approach

Olympus Group has established a global Enterprise Risk

### Enterprise Risk Management Risk Categories

Risk Categories	Risk Sub-Categories					
Strategic (incl. External)	• Planning & Resource Allocation	• Business Development & Investment	• Communication & Stakeholder Management	• Market Dynamics	• Force Majeure	
Operations & Product	• Research & Development	• End-to-end Supply Chain	• Sales, Marketing & Service	• Quality	• Physical Assets	• People & Human Resources
Financial	• Capital Structure	• Accounting & Reporting	• Liquidity & Credit	• Revenue Cycle	• Tax	
Governance	• Culture	• Legal	• Data Privacy	• Corporate Governance		
	• Regulatory	• Compliance				
IT & Digital	• IT Security & Cyber	• IT Applications	• IT Governance	• IT Infrastructure & Services	• Digital	

### Enterprise Risk Management Risk Evaluation Method



Management Methodology and Approach which includes five Risk Categories (1. Strategic (incl. External), 2. Operations & Product, 3. Financial, 4. Governance, and 5. IT & Digital) and corresponding Risk Sub-Categories.

Olympus Group bases the risk assessments on three Risk Evaluation Criteria (1. Exposure, 2. Vulnerability, 3. Velocity) to evaluate and demonstrate how risks might reasonably affect the achievement of Olympus' business objectives and company strategy.

Based on the three dimensions, Olympus Group actively identifies, mitigates and monitors risks. Mitigation measures are

regularly reviewed and tested for effectiveness. Olympus Group utilizes a 3D-Risk Matrix to effectively visualize and manage risks. This matrix combines Risk Exposure levels with assessed Vulnerability and incorporates Risk Velocity. The 3D-Risk Matrix is divided into four quadrants, each providing specific guidance on appropriate risk response strategies. Olympus Group has implemented an enhanced IT system featuring integrated databases and visual dashboards to enable more effective and data-driven risk-based decision making. During fiscal year 2025, the ERM IT system has been upgraded with in-house design and tested artificial intelligence tools to optimize the risk

portfolio completeness, while simultaneously structuring, categorizing, and standardizing risk descriptions to enhance clarity and comprehension.

[Business Risks](#)

## Compliance

What we do at Olympus Group matters to the people we serve, and how we do our work matters to our stakeholders. To help our management team and employees put Our Purpose and Our Core Values into practice, we have developed a single, simplified resource, the Olympus Global Code of Conduct (the Code). The Code was updated in fiscal year 2025, and is available online in 18 languages. It reflects our enduring legacy of innovation, meaningful impact, and unwavering commitment to integrity. The Code is the foundation for our policies and is required to be read, understood, and followed by our management team and employees. We are committed to acting in accordance with the Code in our global corporate activities.

### ■ Compliance Training

To raise compliance awareness and promote an understanding of important laws and internal rules, as well as to ensure consistent compliance with them, the Global Compliance function strives continually to enhance compliance education programming.

### ■ Compliance Management System

Our Global Compliance function works to raise awareness of













the Code and related compliance policies by providing management teams and employees with the resources and training they need to do business with integrity, treat patients, customers, suppliers, and third-party business partners respectfully and fairly and report concerns when they arise. Olympus Group is committed to fostering a business culture that follows the highest standards of business integrity in all our relationships. The Chief Executive Officer (CEO) is ultimately responsible for compliance with applicable laws and regulations within the business operations of Olympus Group. He has appointed the Global Chief Compliance Officer (CCO), reporting into the Global General Counsel, to be responsible for the Compliance Management System within Olympus Group. The Board of Directors and its Audit Committee receive periodic reports on compliance activities from the CEO, consulting with the CCO as needed. The CCO, together with members of the CCO's Global Leadership Team (GLT), including the Regional Chief Compliance Officers (RCCOs), work with the Regional Compliance teams to ensure that compliance activities in the Olympus regions are carried out and that they reflect best practices through the compliance management system.


During fiscal year 2025, the Legal Function and the Governance, Risk & Compliance Function combined into one organizational team, now known as the Legal, Risk & Compliance Function (LRC) under the leadership of the Global General Counsel. This enhanced LRC Function and


organizational design will improve collaboration among these subfunctions, create a more streamlined and effective team, and further strengthen risk management for Olympus.

### ■ Integrity Line (Global Reporting System)

As stated in the Code, all employees are responsible for immediately reporting any suspected violation of the Code or Company policy. Olympus provides a global reporting system, the Olympus Integrity Line, which is available to all Olympus employees, business partners, and other third parties who wish to report a concern. This system is managed by an independent third party, and reports can be made anonymously, where permitted by local law. The compliance function maintains a cross-functional, cross-regional team that meets regularly, collaborating to continuously improve the effectiveness of the reporting system and processes. In fiscal year 2025, improvements included streamlining internal reporting to enhance the Global Internal Investigations Committee's oversight capabilities, and providing training for stakeholders across regions about the Olympus Global Policy for Internal Investigations further enhancing investigation skills, and harmonizing management of reported concerns and the conduct of internal investigations. The Global Compliance function, at the direction of the CCO and the RCCOs, raises awareness of the reporting system through consistent messaging about the Code and related e-learning programs and communications. In fiscal year 2025, we received 612 reports through the Integrity Line or other means. Olympus takes all reports of concerns seriously. If a concern of misconduct is substantiated following appropriate review, we take corrective action, including policy/process remediation, enhanced training and education for individuals/groups, issuance of warning to individuals, and, in serious cases, termination in accordance with local regulations. In fiscal year 2025, 54% of closed reports were substantiated following review.

	Japan		Americas		EMEA		APAC		China		Global (total)	
												
Olympus Global Code of Conduct Training	10,675	94%	5,098	100%	4,791	94%	2,442	100%	1,838	99%	24,844	95%
Anti-Bribery and Anti-Corruption Training	10,780	94%	4,901	100%	5,975	95%	2,442	100%	1,771	99%	25,869	97%
Third Party (Compliance Risk) Management Training	3,419	94%	2,868	100%	3,500	93%	2,026	100%	1,452	98%	13,265	97%

 Number of assignments to e-learning course

 Completion Rate (% of assigned employees who have completed the course)

[Olympus Global Code of Conduct](#)

[Compliance](#)