

Compliance

# Compliance

Olympus strives to foster an environment of integrity and compliance within the organization. We have adopted the Olympus Global Code of Conduct, which builds on our tradition of over 100 years of innovation, positive contributions to society, and unwavering commitment to integrity. The Olympus Global Code of Conduct is the foundation for our policies, and our management team and employees act in accordance with this Code in their global corporate activities.

## Compliance Management System

Our Global Compliance function works to raise awareness of the Olympus Global Code of Conduct and related compliance policies by providing management teams and employees with the resources and training they need to do business with integrity, treat customers, suppliers, and third-party business partners fairly, and report concerns when they arise. The 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 is responsible for compliance with applicable laws and regulations within the business operations of the Olympus Group and has appointed the Global Chief Compliance Officer (CCO) who is responsible for the Compliance Management System within the Olympus Group. The Board of Directors and its Audit Committee receive periodic reports on compliance activities from the CCO, and they consult with the CCO as needed. The CCO, together with members of the Global Leadership Team, ensures that relevant internal regulations are observed in the regional business centers and that compliance activities are carried out in accordance with the requirements of the management systems overseen by the CCO and are reflective of best practices. During fiscal year 2023, the CCO led an organizational design activity that resulted in the integration of the Risk & Controls, Compliance, Privacy, and Information Security functions into the new and more unified Governance, Risk & Compliance (GRC) Function. This enhanced GRC Function and organizational design, effective April 1, 2023, will improve collaboration among these subfunctions and further strengthen risk management for Olympus.

## Integrity Line (Global Reporting System)

Olympus values a corporate culture of integrity and provides a safe and open workplace where employees can raise questions and concerns. We provide 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. The compliance function maintains a cross-functional team that meets regularly, collaborating to continuously improve the effectiveness of the reporting system and processes. In fiscal year 2023, improvements included the enhanced tracking of policy violations, the integration of additional regional reporting of conflicts of interest, and global adoption of the Olympus Internal Investigations Policy, which establishes the Global Internal Investigations Committee and provides the framework for our internal investigations process as we strive to ensure that legitimate reports of concern will be investigated and treated according to the same high standards regardless of location or department. The Global Compliance function raises awareness of the reporting system through consistent messaging about the Global Code of Conduct and related e-learning programs and communications. In fiscal year 2023, we received 809 reports through the Integrity Line or other means. 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 2023, 82.1% of closed reports were substantiated following review.

### Compliance Management System (As of April 2023)



## 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. Global initiatives for fiscal year 2023 are as follows.

Group training and e-learning related to anti-bribery and anti-corruption	Frequency of program: 1 Number of participants: 22,863 (attendance: approx. 97%)
Group training and e-learning related to Olympus Global Code of Conduct	Frequency of program: 1 Number of participants: 25,516 (attendance: approx. 96%)

Details : Olympus Global Code of Conduct: <https://www.olympus-global.com/company/philosophy/code.html>  
Compliance: <https://www.olympus-global.com/csr/governance/compliance/>