

A woman with long dark hair is carrying a young child on her back. They are in a grassy field with trees in the background. The sun is low on the horizon, creating a warm, golden glow and lens flare effects. The woman is wearing a light-colored top and dark shorts. The child is wearing a striped shirt.

OLYMPUS

OCA CODE OF BUSINESS CONDUCT:

BECAUSE WHAT
WE DO MATTERS

TABLE OF CONTENTS

CEO LETTER	3
INTRODUCTION	4
INTEGRITY MATTERS	9
Conflicts of Interest	10
Use of Company Resources	12
Insider Trading	13
Maintain and Manage Company Records	13
Political Activities	14
UNITY MATTERS	15
Providing Equal and Fair Opportunities	16
Demonstrating Respect for One Another	17
Maintaining a Safe and Healthy Work Environment	18

A LONG-TERM VIEW MATTERS	19	EMPATHY MATTERS	30
Conducting Business Honestly, Fairly, and Free from Corruption	20	Operating Responsibly and Sustainably	31
Interacting Appropriately with Health Care Professionals	21	Actively Contributing to Society	32
Fair Competition	22	Securing Information	33
Full and Fair Information about Our Products	23	Protecting Data Privacy	34
Protecting Company Knowledge and Intellectual Property	24	AGILITY MATTERS	35
Protecting Company Assets	25	Speak Up	36
Commitment to Product Quality, Safety, and Security	26	Listen Up	36
Media and Investor Inquiries	27	What to Expect If We Make a Report	37
Government Requests, Audits, or Investigations	27	INTERACTIONS WITH HEALTH CARE PROFESSIONALS	38
Managing Third Parties	28		
International Trade	29		



RICHARD REYNOLDS
PRESIDENT,
OLYMPUS CORPORATION
OF THE AMERICAS

PRESIDENT'S LETTER

DEAR OCA COLLEAGUES,

Our products and services significantly affect the quality of people's lives, and it is important that we consider our duty to customers, patients, colleagues, and the environment as we conduct business. While we always strive to deliver strong business results, the manner in which we achieve those results is even more important and hinges on our commitment to doing the right thing the right way.

This Code, along with the Olympus Global Code of Conduct and Core Values, help us navigate our complex business and regulatory environments. As we keep the patients at the forefront of our focus and act with integrity, we lead by example for others.

While no guide or policy can address every question or situation in a business like ours, I call upon you to take the responsibility to exercise good judgment and consistent demonstration of our Core Values. Raise questions or concerns when you have them or are uncertain. Be transparent and candid, and report activity that you believe may be in violation of the law or Company Codes or policies. Never retaliate or support retaliation against anyone who reports suspected violations.

By following the spirit of this Code and behaving in a manner consistent with our Core Values, we will persistently cultivate trust and respect with each other and those we serve, ensuring Olympus' success for years to come.



Richard Reynolds

A group of people in a meeting, overlaid with a teal tint. The image shows several individuals, including a man in a white shirt and a woman in a striped shirt, looking at documents on a table. A woman on the right is holding a clipboard. The background is blurred, suggesting an office or meeting room setting.

INTRODUCTION

OUR PURPOSE DRIVES OUR CODE

At Olympus, we have a Corporate Philosophy, which consists of Our Purpose, and Core Values and associated Behaviors.

OCA's Code of Business

Conduct ("Code") aligns with the Olympus Global Code of Conduct and serves as our guide to responsible business conduct.

In addition to following the Code, we all must:

- Be honest in all our dealings on behalf of Olympus
- Seek advice when we are unsure about what to do in situations that pose ethical challenges
- Know and follow the laws, regulations, and policies that affect our jobs
- Speak up if we encounter a violation of policy or law, or if we see or learn about something that concerns us or makes us uncomfortable

OUR CODE APPLIES TO EVERYONE

It is critically important that every Olympus employee, contractor, consultant — everyone — accepts their responsibility to act with integrity.

This Code applies to all of us. We also **expect that our third parties will adopt standards consistent with OCA's Code.**

Olympus managers have a heightened responsibility — not only to know and follow the Code but also to act as a role model for others, demonstrating integrity on a day-to-day basis.

Where can I find the Olympus Global Code of Conduct?

Access the Olympus Global Code of Conduct here **Olympus Global Code of Conduct.**

HOW TO USE THE CODE

Our Code is a point of reference for doing the right thing the right way and a statement reflecting our Core Values and ethical principles. It contains references to key Olympus policies, which contain further details regarding the Company's requirements and expected behaviors. There are additional Olympus policies and control documents that are not referenced in the Code, but which can provide further guidance. Use the Code, along with entity and business unit policies and procedures, to guide your decisions and actions.

Use the Code as a good-judgment guide for handling challenging situations and addressing difficult ethical questions and consider it a portal to more detailed policies, procedures, and control documents.

Read the Code to know what we expect and consult it if you need guidance or have questions about what's legal, fair, or right.



What if the Code doesn't answer my question?

This Code cannot answer every question in every situation.

If you have questions about how to follow the Code or live the Olympus Core Values in a particular situation, talk to your manager.

You can also consult Olympus entity and business unit policies, which contain more detailed requirements, or seek advice from OCA subject matter resources.

What happens if someone doesn't follow the Code?

We all have a responsibility to ask for help and seek guidance when we are unsure of what to do.

Anyone who fails to follow the Code may face corrective or disciplinary action, up to and including termination.

AT OLYMPUS,
WE HAVE OUR
CORPORATE
PHILOSOPHY,
WHICH CONSISTS
OF OUR **PURPOSE**
AND OUR **CORE**
VALUES.

Our Purpose, *Making people's lives healthier, safer and more fulfilling,* is our reason for being, the culmination of our efforts that motivates us all to come to work every day.

Our Core Values and Behaviors are the beliefs and principles we share. These are the elements that best describe the type of company we are and strive to be. These Values, supported by the 15 phrases of Our Behaviors, are shared among all global Olympus employees and reflected in everything we do at Olympus and in our day-to-day work to let us realize Our Purpose.

OUR CORE VALUES



PATIENT FOCUS

We put patients at the heart of everything.



INTEGRITY

We do the right thing.



INNOVATION

We look for new ways to make things better.



IMPACT

We take accountability and get things done.



EMPATHY

We care for one another and work together.



INTEGRITY MATTERS



WE ARE
TRUSTWORTHY,
HONEST, AND ACT
IN GOOD FAITH

CONFLICTS OF INTEREST

As employees of Olympus, we owe a duty of loyalty to the Company and must make fair and objective business decisions. This means we need to avoid or address any situation that creates a real or perceived conflict between our personal interests and Olympus's interests. Many actual and potential conflicts of interest can be addressed and resolved without a serious issue.

WHAT WE DO:

- Identify situations where our personal interests or relationships could influence the decisions we make
- Identify situations where our personal interests or relationships could be perceived by others to influence the decisions we make
- Disclose, via the **Conflict of Interest Disclosure Form**, any conflicts of interest that exist when we come to work at Olympus and those that arise during the course of employment.
- Work transparently with Olympus to determine whether or not there is an actual or potential conflict of interest, and if so, whether or not the conflict may be waived
- Cooperate fully and honestly in any internal review, investigation, or audit of a potential conflict of interest

Key Concept to Remember

A "family member" includes spouse, domestic partner, significant other, someone with whom you have an intimate, romantic, or dating relationship, sibling, parent, child, step-parent, step-child, in-law, grandparent, grandchild, aunt, uncle, or other close personal relationships that could create a conflict of interest.

THE FOLLOWING SITUATIONS CAN LEAD TO CONFLICTS OF INTEREST:

Financial interests and investments – for example, if:

- You or a family member has an ownership interest in an Olympus competitor, supplier, service provider, or customer
- You have any influence or decision-making authority in an Olympus business transaction or business decision in which you or a family member may have a personal or financial interest
- You accept part-time employment, enter into a contract for services, or engage in a business transaction with an Olympus competitor, supplier, service provider, or customer

Personal relationships – for example, if:

- A family member is employed by Olympus or an Olympus competitor, supplier, service provider, or customer

ADDITIONAL RESOURCES:

- [Conflicts of Interest Policy](#)

Business Opportunities – for example, if:

- You use Olympus time or contacts to promote personal interests of a party other than Olympus
- You pursue or support a business venture related to a confidential or proprietary idea pursued by Olympus or that directly competes with Olympus

Outside employment, volunteerism, and service on boards – for example, if:

- You serve as an officer, director, or board member of a competitor, customer, supplier, vendor, or partner if your position could permit you to participate in any transaction with, or influence Olympus's relationship

Gifts, entertainment, and business courtesies – for example, if:

- You offer or receive items of value, such as meals, gifts, or entertainment in the course of conducting business with customers, suppliers, distributors, and consultants with whom Olympus currently has or is likely to engage in a business relationship

For specific guidance related to business courtesies with HCPs, see the [Interactions with Health Care Professionals](#) section of this Code.

WE MUST ALL BE TRUE TO OLYMPUS BY IDENTIFYING POTENTIAL CONFLICTS OF INTEREST AND ADDRESSING THEM WITH CANDOR AND TRANSPARENCY.



Business Courtesies (excludes Health Care Professionals)

- Must be modest in value
- May not create commercial irregularities or cloud judgment
- Olympus employees may never solicit business courtesies
- Cash or cash equivalents may not be given or received to or from a business colleague

For specific guidance related to business courtesies with HCPs, see the [Interactions with Health Care Professionals](#) section of this Code.

USE OF COMPANY RESOURCES

We are expected to show common sense and good judgment when using Company resources. Remember, these resources include both tangible items, such as computers, telephones, etc., as well as non-tangible items, such as our colleagues' time. Always keep personal use of Company resources to a minimum.

WHAT WE DO:

- Use OCA resources for business purposes and to fulfill our mission, but never for illegal or inappropriate activities (e.g., pornography or gambling)
- Avoid waste, abuse, and inappropriate practices
- Recognize that our computers, devices, and networks belong to OCA, and OCA may review or retrieve information from them at any time
- Exercise professionalism when using computing resources and social media tools in order to protect the Olympus brand
- Use OCA resources to support Company business and not for a personal business, consulting effort, or outside fundraising activity



Can I use my Olympus phone to make personal calls?

In general, we should use corporate assets for the benefit of OCA and for authorized Olympus business purposes only — not for personal use or for the benefit of any other individual or entity. However, OCA will permit personal use of Company resources if such use is of a reasonable, incidental, and insignificant nature and such use does not adversely affect our business interests.

INSIDER TRADING

Through our work at Olympus we may learn critical inside information that has not been publicly released and that could influence Olympus Corporation's share price, such as financial results, proposed acquisitions, or plans to commercialize new products. We all have a responsibility to keep this information private and not act on it inappropriately.

WHAT WE DO:

- Keep critical inside information from being released to the public prematurely
- Ensure critical inside information does not affect our decisions to buy or sell Olympus shares
- Ensure critical inside information that relates to other companies does not affect our decisions to buy or sell other companies' shares
- Keep confidential information secret and do not tip others to buy stock or securities based on inside information about Olympus or any other company

ADDITIONAL RESOURCES:

- [Insider Trading Policy](#)

MAINTAIN AND MANAGE COMPANY RECORDS

Our books and records must fairly, accurately, and completely represent our operations to internal and external stakeholders, who must be able to rely without question on the integrity of those records.

WHAT WE DO:

- Record all transactions honestly, accurately, candidly, and in accordance with OCA policies and procedures
- Be diligent in the storage and retention of company records
- Follow guidance specified in the Olympus Document Retention Schedule maintained by OCA Legal — the Record Retention Schedule can help you determine how long to keep content and prevent early disposition of information
- Conduct business only on OCA-approved systems, applications, and data storage repositories
- Store paper and other physical records in OCA secured locations

POLITICAL ACTIVITIES

As a company, we do not make contributions to political parties or individuals. We value free political affiliation and expression, however, and encourage employees to participate in community affairs and the political process.

WHAT WE DO:

- Avoid speaking for the Company politically or express political affiliations on the Company's behalf
- Take proper precautions to ensure that your personal political activities are not interpreted as Olympus supporting any particular political party, activity, representative, or candidate
- Avoid politically charged commentary on social media, where your identity may be affiliated with Olympus
- Prevent contributions of Company funds to government officials, political candidates, or others to promote the Company's political or commercial interests
- Avoid soliciting contributions or political support from other Olympus employees



Can OCA make a political contribution?

No, contributions of Olympus funds to promote the Company's political or commercial interests are prohibited by Company policy.

Employees may contribute to candidates, parties, and civic organizations on a voluntary basis while on the employee's own time and at the employee's own expense. OCA will not reimburse personal political contributions.



UNITY MATTERS

WE ARE STRONGEST
WHEN WE WORK
TOGETHER AS A TEAM



Did You Know?

Olympus has several Employee Resource Groups (ERGs) including the Women's, LGBTQ+, and Veterans ERGs.

PROVIDING EQUAL AND FAIR OPPORTUNITIES

We are proud of our commitment to a respectful, fair, and welcoming workplace. We believe it drives business success. We recruit, hire, assign, and promote based on merit, skill, and experience and provide equal access to our benefits.

WHAT WE DO:

- Share knowledge and help others make progress
- Recruit, hire, assign, and promote based on merit, skill, and experience
- Follow all applicable laws and regulations relating to wages, benefits, and working hours
- Support basic human rights, respect labor laws, and do not use any form of forced, compulsory, or child labor
- Report any human rights abuse immediately

ADDITIONAL RESOURCES:

- [Anti-Harassment and Non-Discrimination Policy](#)

DEMONSTRATING RESPECT FOR ONE ANOTHER

We recognize that employees are our most valuable resource, and we embrace the diversity of people, views, and work styles. By celebrating our differences, we build a stronger, more compassionate company.

WHAT WE DO:

- Treat co-workers with courtesy, respect, and dignity regardless of position
- Demonstrate appreciation for diversity of people, views, and work styles
- Be inclusive of people with diverse perspectives and backgrounds
- Support an open exchange of ideas and healthy debate
- Be open to working with people of different abilities
- Support those who speak up without risk of retaliation
- Accept others and do not discriminate nor tolerate discrimination by others
- Be respectful and do not harass nor tolerate harassment by others



What should I do if I hear someone make an offensive joke?

If you feel comfortable, try talking to the person privately to share why the joke is offensive. If that is not an option, talk to your manager or HR.



MAINTAINING A SAFE AND HEALTHY WORK ENVIRONMENT

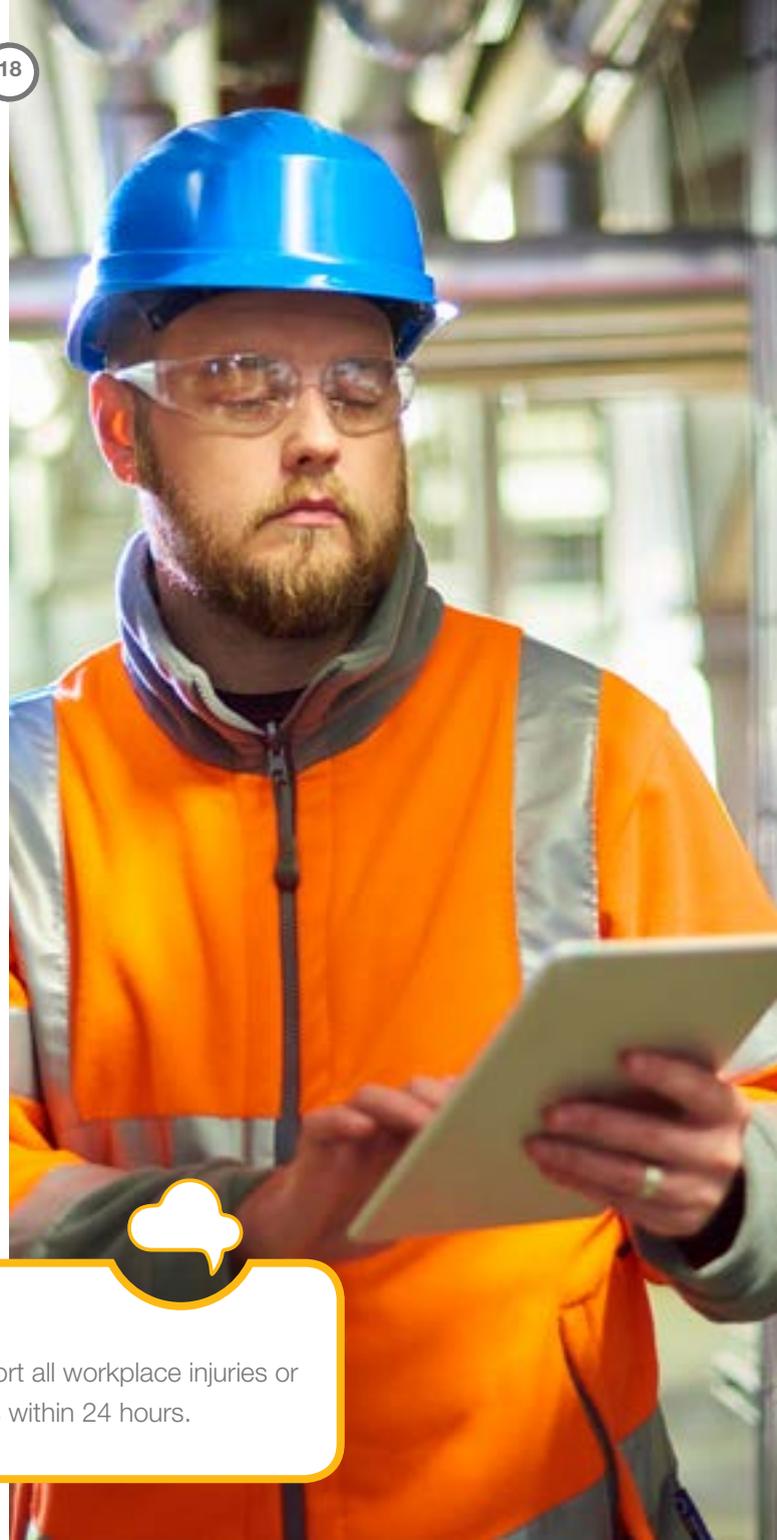
When we have a safe and healthy workplace, everyone benefits. We are all responsible for complying with global safety standards and taking steps to reduce threats and avoid accidents.

WHAT WE DO:

- Use good judgment and act in a manner that is safe for all of us
- Support a workplace free of illegal drugs
- Reject joking about, engaging in, or tolerating violence or threats of violence, and report any threatening or potentially violent situations to HR or Security immediately

ADDITIONAL RESOURCES:

- [Environmental, Health, and Safety Policies](#)
- [Incident Reporting Policy](#)
- [Workplace Violence Prevention Policy](#)



Did You Know?

We are required to report all workplace injuries or illnesses to supervisors within 24 hours.

A LONG-TERM VIEW MATTERS

WE LOOK BEYOND
THE PRESENT
TO DELIVER
FUTURE VALUE

CONDUCTING BUSINESS HONESTLY, FAIRLY, AND FREE FROM CORRUPTION

We have a responsibility to each other, to our customers, to our stakeholders, and to society to conduct business honestly and fairly by acting with integrity and respecting the laws and regulations of the places in which we conduct business. We prohibit corruption and bribery by our employees, contractors, or any other third parties acting on our behalf.

WHAT WE DO:

- Conduct business lawfully and not by offering, authorizing, or giving any bribe, kickback, or other illicit payment or benefit in order to improperly induce or reward a customer or to obtain or retain business
- Keep complete and accurate records and supporting documentation of all payments and business expenses
- Actively supervise contractors or any other third party working on our behalf to prevent illegal conduct or conduct that could give the appearance of being illegal
- Promptly report any activity that we believe may be in violation of the law, this Code, or corporate policies

ADDITIONAL RESOURCES:

- [Anti-Corruption Policy](#)
- [Public Procurement, Tenders, and Sales to Public Entities in Latin America Policy](#)
- [Interactions with Health Care Professionals Section of this Code](#)



Remember

A bribe may be monetary or non-monetary. Be aware of the anti-bribery guidelines when giving or receiving anything of value — including, but not limited to, a charitable contribution, compensation, consulting arrangement, free use of our equipment, gift, grant, job offer, or travel.

INTERACTING APPROPRIATELY WITH HEALTH CARE PROFESSIONALS

When we interact with our health care customers, we follow the same guidelines for conducting business honestly, fairly, and free from corruption, which builds trust with patients, health care professionals, institutions, and governments. In addition, there are some specific principles that guide our interactions with these stakeholders.

WHAT WE DO WHEN WE ENGAGE HEALTH CARE PROFESSIONALS:

- Our interactions with HCPs are driven by business need
- We pay or charge HCPs a fair market value for all goods and services
- We document any transfer of value to HCPs transparently
- We treat all HCPs fairly and consistently and do not show special treatment to key opinion leaders or important customers



What is a Health Care Professional (HCP)?

An HCP is an individual or entity that can influence the purchase or use of any Olympus product or service, including physicians, nurses, and office staff.

For specific guidance, see the [Interactions with Health Care Professionals](#) section of this Code.



FAIR COMPETITION

We are committed to maintaining long-term business relationships with our customers and business colleagues, demonstrating integrity in each of our interactions, and dealing fairly with third parties. We will not engage in behavior that interferes with fair competition. We want customers to do business with us because of the quality of our products and services and the performance of our team.

WHAT WE DO:

- Keep Company secrets by never discussing or exchanging business information with a competitor, including: price, market strategy, potential innovation, or prospective mergers or acquisitions
- Compete fairly by avoiding conduct with competitors that constitutes or may give the appearance of unfair competition, including: agreements to fix prices, divide customers, markets, or territories, or manipulate the results of a bidding process
- Exercise care in all communications and avoid terms such as “control” or “dominate” that could be misinterpreted to suggest anti-competitive actions
- Obtain competitive intelligence only through appropriate methods and sources



Remember

Never misrepresent your identity to obtain competitor information. Before attending trade association meetings, make sure that you understand the rules about talking with competitors.

ADDITIONAL RESOURCES:

- [Fair Competition Policy](#)
- [Public Procurement, Tenders, and Sales to Public Entities in Latin America Policy](#)



**Remember**

Our product communication and promotion policies apply to written, oral, graphic, or broadcast material.



FULL AND FAIR INFORMATION ABOUT OUR PRODUCTS

Taking a long-term view in our interactions with customers means being completely honest about our products at all times. That builds trust with our stakeholders. Being true to our customers includes promoting our products only in a clear, fair, and understandable way and consistent with regulatory requirements. For our medical products, this means that all product communication must be fair and balanced, truthful, not misleading, and meet other regulatory requirements so that health care professionals can make unbiased clinical decisions based on accurate information.

WHAT WE DO:

- Treat Olympus customers and service providers in an ethical and professional manner
- Offer objective commercial information and patient-customer oriented benefits
- Highlight the advantages of Olympus products and/or services observing applicable legislation and fair competition parameters
- Only use product communication material that has been reviewed and approved through the appropriate channels

PROTECTING COMPANY KNOWLEDGE AND INTELLECTUAL PROPERTY

At Olympus, we are committed to protecting Company knowledge and operating in compliance with applicable laws and regulations designed to protect sensitive and proprietary information. During your employment, you may have access to Company information that is confidential/top secret, patented, proprietary, or sensitive. This may include information from customers or third parties in the course of business activities.

WHAT WE DO:

- Safeguard confidential information about Olympus and discourage others from disclosing confidential information they might have about other companies
- Take precautions to protect Olympus intellectual property and confidential information, including safeguarding your laptop and other electronic devices
- If you're not sure whether certain information is confidential, treat it as confidential until you learn otherwise
- Disclose confidential information outside Olympus only after obtaining approval from your manager and consulting the Legal Department about the need to sign a confidentiality agreement
- Report any copying or misuse of Olympus intellectual property, as well as any loss of confidential information on your laptop or other electronic devices
- Execute Confidentiality or Non-Disclosure Agreements only in accordance with processes and forms established by OCA Legal



Remember

We want to keep our confidential information and intellectual property secret.

Always protect internal Company information such as: pricing and marketing information, meeting minutes and materials, internal manuals, emails, reports, technical documents, information related to future products, manufacturing technology, services or research, customer confidential data, and any other data marked as confidential or top secret.

PROTECTING COMPANY ASSETS

We have a responsibility to manage our valuable Olympus assets (e.g., equipment we may use in the field or loan to customers) prudently and to know the whereabouts of these assets at all times. This responsibility includes tracking Company assets with 100% accuracy and completeness.

WHAT WE DO:

- Manage and document asset transfers in accordance with Olympus policies, procedures, and work instructions
- Take action and alert your manager when asset discrepancies occur
- Facilitate asset retrieval procedures at the conclusion of an arrangement (e.g., Evaluation or Demonstration) or after the predetermined time outlined in written documentation
- Provide accurate reporting of all assets in your possession following Olympus procedures
- Cooperate in asset inventory audits

ADDITIONAL RESOURCES:

- [**Evaluation and Demonstration Policy**](#)



COMMITMENT TO PRODUCT QUALITY, SAFETY, AND SECURITY

At Olympus, we are truly committed to the quality, safety, and security of our products and services. We know that we must ensure that our products are manufactured and distributed in accordance with all applicable quality standards. To be a company that continually contributes to the “healthier, safer, and more fulfilling lives” of people around the world, we all must engage in our day-to-day business activities with a clear understanding of the requirements for quality and safety of our products.

WHAT WE DO:

- Comply with good regulatory, manufacturing, and clinical practices to ensure the quality, safety, and efficacy of our products and services as well as the safety of our customers
- Follow label instructions and promote our products correctly
- Ensure the regulatory and clinical information we generate internally or submit to the authorities is true, accurate, and complete
- Understand the information we need to collect when documenting a product quality complaint or adverse event, and report any adverse event or product quality complaint to our Quality Assurance Department on a timely basis
- Consider cybersecurity and privacy risks management throughout the product development and service lifecycles
- Identify product security vulnerabilities and communicate mitigation actions with stakeholders

MEDIA AND INVESTOR INQUIRIES

We value unity and speak with one voice to external stakeholders. Only certain Olympus employees are designated to speak on behalf of the Company. This ensures that our internal company information, such as financial developments, or incidents that may draw the attention of the media, like accidents, crises, key corporate transactions, and management changes, are communicated with a consistent approach.

WHAT WE DO:

- Refer all media inquiries to OCA Corporate and Medical Communications to avoid potential misstatements in the press
- Use caution when posting Olympus-related information to social media sites, which can be a source of information for media publications
- Refer to Company policies for additional requirements

ADDITIONAL RESOURCES:

- [External Communications Policy](#)
- [Social Media Policy](#)

GOVERNMENT REQUESTS, AUDITS, OR INVESTIGATIONS

As a Company, we communicate with representatives of federal, state, and local government agencies in good faith, with clarity, and with appropriate transparency.

WHAT WE DO:

- Refer all communication requests from federal, state, or local government agencies to an authorized Company representative
- Make sure that all communication with government agencies and entities regarding our role as a federal contractor are conducted by an authorized marketing or support contact
- Direct any other inquiries from government representatives to the OCA Legal Department — do not attempt to answer them yourself



MANAGING THIRD PARTIES

At Olympus, we are committed to maintaining the highest legal and ethical standards while conducting business, including through third parties. We do this through compliance with anti-corruption laws, anti-bribery laws, and other legal requirements.

Olympus will only do business with third parties that will commit to complying with national and/or international laws, regulations, and Olympus policies. Our Third Party Management Program helps ensure that there is a consistent approach throughout OCA.

WHAT WE DO:

- Adequately screen third parties before engaging in business relationships and re-evaluate existing business relationships regularly
- Ensure that third parties understand and agree to abide by Olympus's policies prohibiting corruption, bribery, and other illegal or inappropriate activities
- Effectively manage, control, and account for third-party relationships and periodically review business relationships with third parties
- Mitigate the risks associated with engaging third parties, including the risk that a third party may engage in an illegal act like bribery
- Monitor and, when possible, secure and exercise the right to audit

ADDITIONAL RESOURCES:

- [Anti-Corruption Policy](#)
- [Sales and Marketing Intermediaries & LAD Service Providers - Third Party Management SOP](#)
- [LAD Manual of Policies and Guidelines](#)



WHAT TO WATCH FOR:

Be cautious if a third party:

- Has no track record in the industry
- Mentions close ties to government officials
- Is vague on details about their company or business structure
- Requests unusual payment arrangements, such as payments being sent outside the country or to someone else
- Lacks transparency related to finances
- Involves someone else in the transaction who seems to contribute no value

**If you have a question,
please contact**

Compliance@olympus.com



INTERNATIONAL TRADE

As a global business, we engage in frequent international trade. We must follow import and export laws governing international trade and any required restrictions, including economic sanctions. Those laws and regulations can be very complex, so seek guidance when needed.

WHAT WE DO:

- Provide accurate and truthful information to customs and regulatory agencies
- Avoid prohibited trade practices, boycotts, and trade restrictions
- Only engage in import and export activity in a legal and ethical manner
- Raise questions and concerns with the OCA Legal Department



Remember

Consult the OCA **Document Center, EndoWise**, and other repositories for entity and business unit policies and procedures, which contain more detailed requirements, or seek advice from OCA subject matter resources.

EMPATHY MATTERS



WE CARE ABOUT ALL
OUR STAKEHOLDERS

OPERATING RESPONSIBLY AND SUSTAINABLY

We follow environmental laws and regulations and are committed to taking steps to protect the environment.

WHAT WE DO:

- Keep our workplace safe and clean and take action to correct unsafe work practices or conditions promptly
- Reduce energy consumption and use of natural resources and reuse and recycle materials where possible
- Avoid use of materials and methods posing environmental and health risks when suitable alternatives are available
- Follow proper procedures for hazardous chemicals and waste disposal
- Periodically review and exercise emergency procedures that apply to our roles



If I observe an environmental, health & safety issue, do I really need to report it?

All EHS events must be reported as soon as possible, preferably within 24-48 hours of the event, to the

[Olympus Incident Reporting Portal.](#)

ACTIVELY CONTRIBUTING TO SOCIETY

We strive to play an integral role in society, sharing its values and contributing as good corporate citizens.

WHAT WE DO:

- Support and promote cultural, educational, and volunteer activities
- Work toward sustainable growth together and support advancements in research, education, and development via Olympus Grants and Charitable giving programs
- Endeavor to realize better health and happiness for people by being integral members of society and sharing common values

ADDITIONAL RESOURCES:

- [Global Guideline for Charitable Donations](#)
- [Healthcare-Related Charitable Contributions \(Donations and Corporate Charitable Sponsorships\)](#)
- [Educational Grants Policy](#)
- [Global Rule for Investigator Initiated Trials](#)



SECURING INFORMATION

We share responsibility for securing the confidentiality, integrity, and availability of data. For that reason, make sure that sensitive data is protected and take appropriate measures to protect Olympus's computing devices (e.g., computers, smartphones, iPads, and notebooks).

WHAT WE DO:

- Follow the safeguards and standards in our information security policies
- Keep usernames or passwords private
- Only open or forward file attachments from recipients you recognize
- Be cautious when using external memory devices since they may be infected with viruses
- Secure (e.g., lock up) computing devices that are not in your possession

ADDITIONAL RESOURCES:

- [Electronic Communications Policy](#)
- [Information Security Intranet Page](#)
- [Data Privacy Intranet Page](#)



Who should I report information security concerns to?

Report concerns directly to the IT Security Department at IT.Security@olympus.com.



Take care to protect your work computer and devices.

Use common sense security measures

- Don't leave them unattended
- Don't check them as baggage when traveling
- Don't leave them behind in a car
- If you are staying in a hotel, put them in the safe when you go out

PROTECTING DATA PRIVACY

We are trusted stewards of personal information provided to us and we show respect for each other and the Company by protecting personal, confidential, and sensitive information. We handle personal data and health information in ways that protect the privacy rights of everyone involved and we do not share the data with others who do not have a need to know or use such data.

WHAT WE DO:

- Obtain and retain only the minimal amount of personal or sensitive information needed to conduct business
- Use sensitive or proprietary information only for its intended purpose
- Share sensitive or proprietary information on a need-to-know basis or need-to-use basis and according to applicable laws and customer expectations



What should I do if I find personal information in an unsecure area or on a common printer?

Report concerns directly to the IT Security Department at

IT.Security@olympus.com.

AGILITY MATTERS

WE CHALLENGE THE
STATUS QUO WITH
OPEN MINDS, FOCUS,
AND SPEED

WE DEMONSTRATE OUR AGILITY BY PROMPTLY REPORTING CONCERNS AND POTENTIAL VIOLATIONS OF OUR CODE AND COMPANY POLICIES. IF MISCONDUCT HAPPENS HERE, WE NEED TO ADDRESS IT. WE SHOULD ALL FEEL COMFORTABLE TURNING TO OUR INTEGRITY RESOURCES.

SPEAK UP

We ask questions when we need guidance. We speak up if we think something is wrong.

LISTEN UP

We are committed to a workplace where open communication and dialogue is expected and encouraged.

If you are a manager and someone raises a concern, take it seriously.

OUR INTEGRITY RESOURCES

Have concerns? You can:

- Seek support from your manager/supervisor
- Contact your Compliance Business Partner or Compliance at (484) 896-4472 or compliance@olympus.com
- Contact Human Resources, the Legal Department, or the Chief Compliance Officer
- Contact the Olympus Integrity Line at olympus.ethicspoint.com or at:
 - U.S., Canada, & Puerto Rico: 1-844-277-1698
 - Canada (French): 1-855-350-9393
 - Chile: 800914382
 - Brazil: 0800-892-0649
 - Mexico: 001-855-232-1301

WHAT TO EXPECT IF WE MAKE A REPORT

Expect that we will be treated fairly. Olympus prohibits retaliation against anyone who raises concerns in good faith. We take this very seriously.

Expect Olympus to take action. We will review the situation and, if warranted, conduct a fair and objective investigation.

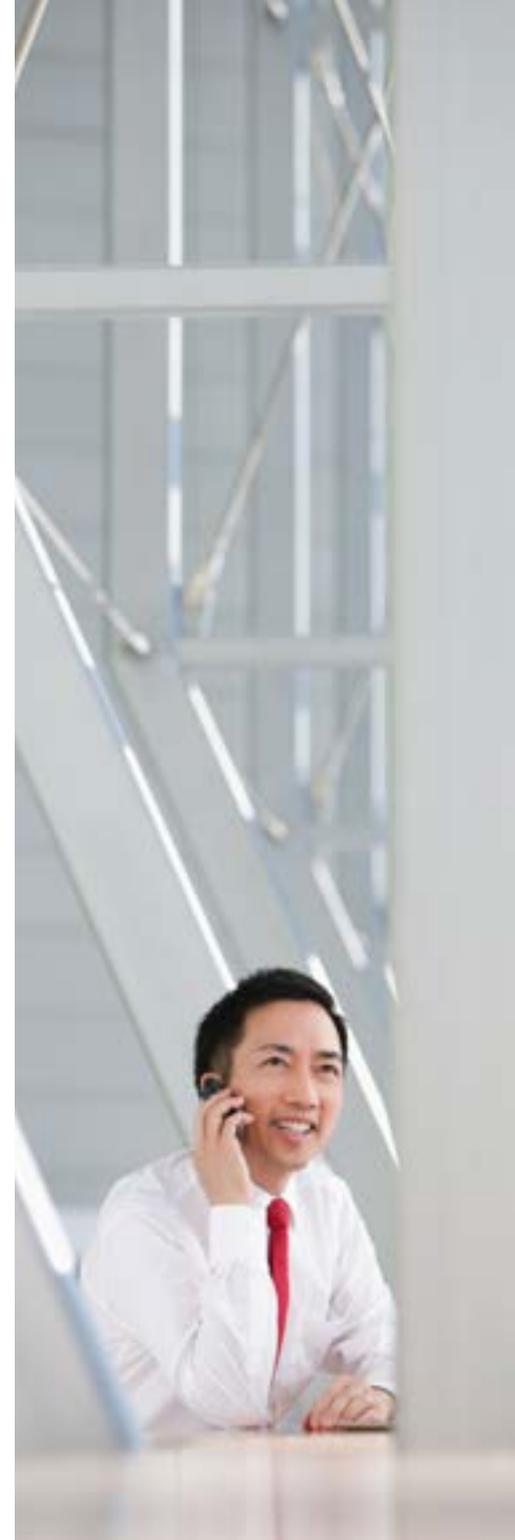
Expect to be treated with respect. We will keep reports as confidential as possible and follow up to the extent we are able.

CAN WE BE ANONYMOUS?

Yes, we've put a system in place to allow anonymous, confidential reporting.

The Olympus Integrity Line is maintained by a third party, EthicsPoint. Here's how it works:

- Make a report 24 hours a day, 7 days a week, every day of the year, by telephone or by using the internet, with translation services for up to 70+ languages
- Reports are treated with the utmost discretion and investigated by a subject matter resource in a prompt and thorough manner





INTERACTIONS
WITH HEALTH CARE
PROFESSIONALS

As a manufacturer of medical devices and life science products, we innovate to create value for patients and customers.

To ensure that our efforts remain focused on patient benefit, we need to be thoughtful about the way we interact with health care professionals.

To learn more about what we expect, please see the additional resources referenced in this section.

MARKETING AND PROMOTIONAL OPPORTUNITIES

We promote our products in accordance with the cleared or approved indications and do not promote off-label applications.

- [Product Communications Policy](#)

We may seek commercially reasonable marketing and promotional opportunities. Those opportunities must meet a legitimate business need and be consistent with fair market value

- [Commercial Sponsorships Policy](#)
- [Jointly Conducted Education and Marketing Programs Policy](#)

- [Meals Provided to Health Care Professionals; Prohibition on Entertainment Policy](#)

SALES, LEASE, AND RENTAL ACTIVITIES

We take care that our sales discounts or rebates are appropriate, accurately reported, clearly disclosed in writing, and in line with our policies.

- [Discount, Rebates, and Other Price Concessions Policy](#)
- [Combination Marketing and Prohibition on Product Tying Policy](#)
- [Sale, Lease, Rental or Leveraged Contracts Policy](#)

ASSET MANAGEMENT

We follow our internal policies when supplying HCPs with products for evaluation, loan, or similar purposes, including documenting these agreements in writing, keeping accurate and up-to-date inventory records, retrieving assets timely or making sure that product is disposed of correctly, and adequately training OCA Representatives.

- [Evaluation and Demonstration Policy](#)
- [Seeking Feedback from Health Care Professionals on Products Policy](#)
- [Warranties and Repairs Policy](#)

CONDUCT IN A CLINICAL SETTING

We understand how to conduct ourselves in a clinical setting, including when serving as a technical advisor on the use of our products.os.

- [Business Associate Obligations Under Service and Support Activities Policy](#)
- [Conduct of OCA Representatives in Clinical Settings Policy](#)

PROVIDING ITEMS OF VALUE TO HCPS

We document all agreements and transfers of value.

- [Health Care Professional Consulting Arrangements Policy](#)
- [Transparency Tracking and Reporting for Transfers of Value to Health Care Professionals](#)

We do not provide entertainment or recreation, and we provide only modest business meals, which meet the stated policy standards, including strict spending limits.

- [Meals Provided to Health Care Professionals; Prohibition on Entertainment Policy](#)

We only occasionally give modest educational items to HCPs that benefit patients or serve a genuine educational function for HCPs and have a fair market value of less than \$100.

- [Educational & Patient Benefit Items Provided to Health Care Professionals; Prohibition on Gifts](#)

We provide appropriate and accurate coverage, reimbursement, and health economics information about our products when applicable

- [Value-Added Services Provided to Health Care Professionals Policy](#)
- [OCI Compliance Directive – Value-Added Items Included in a Tender Process for Healthcare Entities Located in Canada](#)

We may collaborate with HCPs, patients, and organizations representing their interests, to achieve government and commercial payor coverage decisions, guidelines, policies, and adequate reimbursement levels that allow patients to access Olympus products.

- [Product Communications Policy](#)
- [Value-Added Services Provided to HCPs Policy](#)

Local Restrictions

Know and follow any local restrictions.

Some OCA regions have enacted restrictions on the provision of meals to HCPs that are more limiting than otherwise permitted by these principles.



HCP CONSULTING, PROFESSIONAL EDUCATION AND GRANTS

When appropriate, we offer fair-market-value compensation to qualified and adequately trained HCPs for providing services that meet a legitimate business need. We fully and accurately document these agreements in writing.

- [Health Care Professional Consulting Arrangements Policy](#)
- [Travel for Health Care Professionals Policy](#)

We offer or furnish training on the safe and effective use of Olympus Product and educational programs to HCPs which meet the policy standards.

- [Jointly Conducted Education and Marketing Programs Policy](#)
- [Product Training and Education Programs Policy](#)

We may offer continuing education programs, at fair market value,

to HCPs regarding the care and handling of Olympus Products, as well as programs on clinical topics and related devices.

- [Professional Continuing Education Programs Policy](#)

Through the Grants Committee, we provide grants and/or health care-related charitable support, to bona fide independent, educational, scientific, and policymaking organizations that promote scientific knowledge, medical advancement, and the delivery of effective health care.

- [Healthcare-Related Charitable Contributions \(Donations and Corporate Charitable Sponsorships\)](#)
- [Educational Grants Policy](#)
- [Global Rule for Investigator Initiated Trials](#)

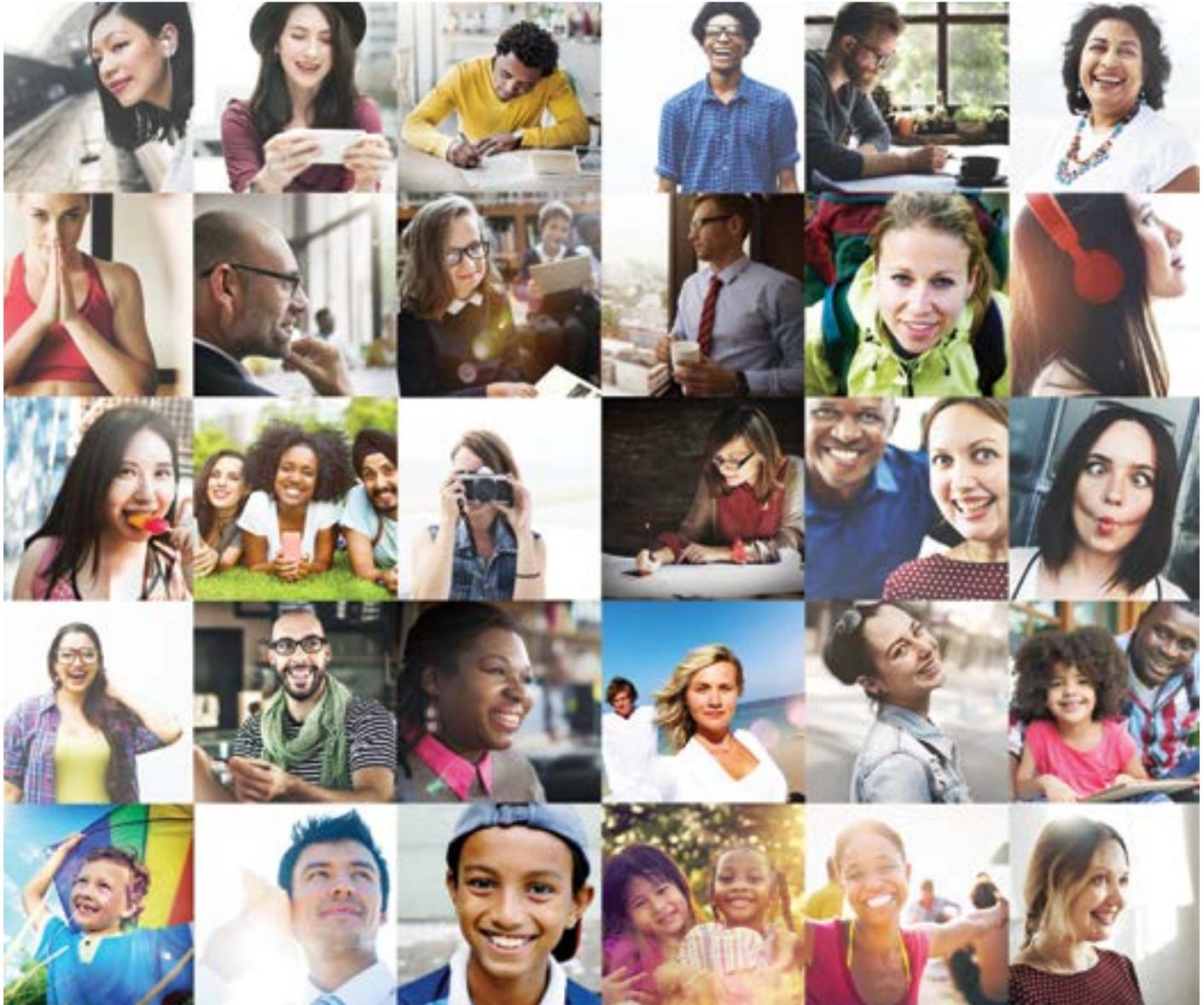
ROYALTY PAYMENTS

We may provide an HCP fair-market-value royalties that are based on factors that preserve the objectivity of medical decision making and avoid the potential for improper influence, in exchange for intellectual property and as defined in a written agreement.

Did You Know?

Only the OCA Grants Committee can approve monetary or in-kind grants to support educational programs, research, and charitable activities.





SPEAK UP: OLYMPUS INTEGRITY LINE

[OLYMPUS.ETHICSPPOINT.COM](https://olympus.ethicspoint.com)

US, CANADA, PUERTO RICO 1.844.277.1698 | CANADIAN FRENCH 1.855.350.9393

BRAZIL 0800.892.0649 | MEXICO 001.855.232.1301 | CHILE 800914382