

## Company Disclosure pursuant to the Australian Commonwealth Modern Slavery Act 2018

SLAVERY AND HUMAN TRAFFICKING STATEMENT – 23 December, 2022

This statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). Our statement demonstrates our measures and methodology to preventing Modern Slavery and Human Trafficking throughout our business and supply chain.

Olympus Australia Pty Ltd (**Olympus Australia**) recognises that slavery and human trafficking can occur in many forms, such as forced labour, domestic servitude, sex trafficking, and workplace abuse. These actions are an abhorrent criminal activity which is not isolated to individual business areas or countries.

Olympus Australia is committed to maintaining and improving its systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain, and our products.

### 1. Our Company

Olympus Australia is one of the Australia's leading distributors of optical products employing over 360 individuals. We provide an extensive range of products for use in a variety of different sectors. Our overall aim is to continue to produce sophisticated and effective products for use in the medical sector (and up until March 31, 2022 also in the scientific and industrial sectors).

As a market leader in the medical device industry, we are devoted to supporting public and private health care providers and institutions throughout Australia. It is critical to Olympus Australia that we continuously develop and improve upon our products and consistently provide medical devices which have a positive effect to patient care.

### 2. Organisation and Supply Chain Structure

Olympus Australia has over 140 suppliers who provide fundamental support to our organisation,

A significant amount of our suppliers originate from Japan, Europe, the United Kingdom, Australia and Vietnam. Our suppliers are all subjected to a stringent procurement and due diligence process prior to being contracted by us. Any indication or tolerance towards activities in contrary to the Modern Slavery Act will result in a re-evaluation by Olympus Australia which may result in a termination of the relationship.

Our Global Suppliers are requested to complete a web-based survey annually "Olympus Group Request to Suppliers." <sup>1</sup>

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<sup>1</sup> [https://www.olympus-global.com/csr/procurement/pdf/procurement\\_request.pdf](https://www.olympus-global.com/csr/procurement/pdf/procurement_request.pdf)

## 3. Due Diligence and Third-Party Management

As a company, we firmly believe that by understanding and acknowledging our customers' and suppliers' past and present activities, we may avoid engaging with them.

We conduct thorough due diligence checks on all of supplier and third parties before the commencement of any business relationship. Our Finance and Compliance Departments conduct initial screening of all locally based third parties of any activity in contrary to domestic or international legislation and our global entities conduct thorough screening for our global suppliers.

A higher level of scrutiny is applied to businesses operating within countries with a history of non-compliant activities and export control sanctions. Alongside this, we monitor and understand the possibility of non-compliance through re-sale with the following categories of third parties:



We continue to improve upon our existing rules and controls by performing routine internal monitoring and audits of all our third parties with additional regional oversight.

## 4. Policies and Code of Conduct— Slavery and Human Trafficking

Our commitment to human rights is outlined by our own principles documented in the Olympus Global Code of Conduct which is aligned to the United Nations Global Compact's 10 Principles related to human rights, labour, environment, and anti-corruption.

The Olympus Global Code of Conduct is a central reference point for all Olympus Australia employees to enable them to understand what behaviour is ethical, legal and responsible. It builds together our corporate core values, national and international laws, internal policies, voluntary commitments, and ethical principles.

We follow our global parent company policies for Human Rights and Labour and Procurement. These policies are based on the company management philosophy.

For suppliers, we set our expectations in areas such as respect for human rights, compliance with legislation, regulations and social norms, including the law concerning the exclusion of antisocial elements the prohibition of corruption, bribery and similar behaviour, the promotion of fair and equitable trading, and consideration for the environment.

## 5. Tackling Modern Slavery — Measures in Place

Olympus Australia utilises the services of an independent company to provide all employees, business partners and other parties an avenue to report violations of our Code of Ethics and Business Conduct, The EthicsLine.

The EthicsLine is available 24 hours a day, 365 days year with all reports kept strictly confidential and all calls untraceable. Personal information relating to the report will not be shared outside of Olympus without the explicit consent of the reporting individual.

Every reportable instance is thoroughly investigated by Olympus Australia. This reporting route is highlighted to all employees during mandatory training sessions conducted by the Compliance Department.

## 6. Modern Slavery Training

Olympus Australia provides mandatory internal awareness training for all employees on Global Code of Conduct, including ethical Supply Chain. In addition to this internal training, all employees are also required to complete Electronic Learning courses on our Global Code of Conduct.

We also monitor feedback provided by our colleagues on our awareness training and are continuously evolving our training program. We aim to provide further resources for employees including targeting training for key employees and additional E-Learning and podcast training materials for all employees.

## 7. Other relevant information – our contracts

In summary, we maintain responsibility and transparency within our supply chains through actions such as the following:

- building awareness of human rights and modern slavery risks with team members in all areas;
- including clauses and terms that address modern slavery risks in contracts with suppliers, third parties and contracts;
- conducting reviews of all business operations and those of suppliers and other business partners to identify areas where there may be a risk of forced labour and modern slavery practices; and
- Increasing awareness of privacy risks and input relevant controls to mitigate these risks.

We also have summarised our routine measures relating to the way we contract with third parties going forward:

Measures	Why	How
<b>Agree to Terms and Conditions</b>	We expect our suppliers and / or third parties to agree to our specific terms and conditions or to add to their own. This is to support corporate terms and conditions around policy and strategy.	Our suppliers and/ or third parties must indicate they have read and understood terms and conditions, prior to proceeding doing business with us.
<b>Declaration</b>	We may provide a Declaration in our agreements that our suppliers and/or third parties must agree to.  E.g. Anti-Slavery Human Trafficking Policy	A declaration may be provided to third parties to agree to when they register. Declarations may be set at required frequencies or when contracts are up for review (i.e. monthly, annual, etc.).
<b>Internal Audits or Assessments</b>	From time to time, our own audit teams will assess review of third party position by sending questions and requesting attachments.	By providing a list of questions sent to third parties to provide responses to and send back with attachments.  Responses and attachments can then be assessed by compliance and audit teams.

This assists us in managing our Modern Slavery requirements and to also procure declarations, support our internal audits, review documentation and request specific policies and procedures from suppliers / third parties.

## 8. Reporting and Feedback

If you become aware of any credible information linking Olympus to slavery and human trafficking, please report this information to Olympus at the e-mail address below:

[customerservice@olympus.com.au](mailto:customerservice@olympus.com.au)

Alternatively, you can report through our Ethics Line service by any of the methods below;

Telephone: 1800 549 716

E-mail: [www.olympus.ethicspoint.com](http://www.olympus.ethicspoint.com)

[www.ethicspoint.com](http://www.ethicspoint.com)

This statement was approved by the Board of Olympus Australia Pty Ltd on 23<sup>rd</sup> December, 2022.



James Bowe  
Managing Director Olympus Australia