

1 July 2011

For the personal attention of:

To whom it may concern

Dear Reader

ANTI-BRIBERY & CORRUPTION – STATEMENT OF INTENT

Following the introduction of the UK Bribery Act 2010 (UKBA), Olympus KeyMed and its subsidiaries (the Group) have reviewed the relevant practices, policies and procedures to ensure that once the UKBA comes into force on 1 July 2011, the Group will comply with all of the acts requirements.

As part of the review, the Group looked closely at its relationship with third parties, to ensure that the Group's relationship with them is legitimate and lawful, in line with the requirements of the UKBA. This is something that the Group has always sought to achieve through its various ethical policies.

Your organisation has been identified as a third party with whom the Group has an agreement, as such, the Group would like to ensure that its relationship with your organisation is not one that may expose it to prosecution under the UKBA.

The UKBA encompasses the bribery offences that have existed for many years, under the 'UK Prevention of Corruption' legislation. These are broadly the acts of being bribed and bribing. However, the UKBA introduces a 'new offence under section 7 of the act, which can be committed by commercial organisations which fail to prevent persons associated with them from committing bribery on their behalf'.

The offence of failing to prevent bribery can be avoided where an organisation can demonstrate that it has adequate procedures in place to prevent bribery. Those procedures can only be effective where they extend to third parties. Accordingly, the Group want to verify that any third party with whom it trades with has adequate procedures in place to prevent bribery.

In ensuring the Group has adequate procedures to prevent bribery it shall routinely undertakes the following activities:

Issue1, KMF 05564, CR 02587 11 July 2011

- Carry out detailed due diligence at the inception of commercial relationships and periodically throughout that relationship
- Audit procedures and practices of third parties in relation to the prevention of bribery (in addition to the usual contractual compliance audit requirements)
- Monitor the performance of third parties against both the Group's and their own prevention of bribery policies
- Operate and support a whistle-blowing procedure available to internal and external third party whistle blowers
- Maintain a gifts and hospitality register in support of the Group's Code of Ethics
- Monitor compliance aligned to local law and to the Group's Code of Ethics and Business Conduct policies
- Carry out due diligence review in relation to employees and contractors for red-flag behaviours or occurrences and
- Train all relevant Group employees in relation to the UKBA compliance requirements, avoiding bribery arising and red flag behaviour

As part of the Group's support to its customers, suppliers and associates it will make UKBA guidance and information available on all of the Olympus KeyMed Group company websites.

The Group expects its customers, suppliers and associates to adopt, as a minimum, standard practices and procedures equivalent to those measures that the Group is putting in place to ensure compliance with the UKBA. However, it remains the responsibility of each customer, supplier and associate to ensure that it complies with the UKBA.

Risk assessments will be performed on the Group's existing customer, supplier and associate lists in the short term, and detailed audits may be carried out on a number of customers, suppliers and associates, as and when required, to ensure compliance to the UKBA, and that adequate procedures are in place to prevent bribery.

It is the Group's policy across all its businesses, in all territories worldwide, to adopt zero tolerance to bribery and corruption. Where the Group, acting reasonably and in good faith, suspects that any of its customers, suppliers or associates have been or may be involved in any act of bribery or corruption in any territory, it shall take any and all desirable and available action to address the offending behaviour and act of the relevant customer, supplier or associate which may lead to early termination of commercial relationship.

Should you have any queries or concerns regarding this letter or the UKBA in general, please e-mail them to: acbw@olympus.co.uk

Regards

Nick Williams

Group Managing Director - Olympus KeyMed &
Managing Director of Olympus Industrial Systems Europa

Issue1, KMF 05564, CR 02587 11 July 2011