



CARESTREAM COMPLIANCE PROGRAM AND ANNUAL DECLARATION OF COMPLIANCE

Carestream's Comprehensive Ethics & Compliance Program

Carestream is committed to maintaining the highest ethical standards in all of our business dealings. Carestream's Comprehensive Compliance & Ethics Program is guided by our Core Values and our Business Conduct Guide. The Business Conduct Guide documents our company's operating standards and provides an overview of many of the laws and regulations that apply to our global consolidated group of companies. It is our expectation that employees will act with honesty and integrity and comply with the Business Conduct Guide and all applicable laws and regulations while conducting company business. Many of the issues included in the Business Conduct Guide are broad and complex, so we provide additional guidance to employees through training and education, additional policies and procedures, and auditing and monitoring.

Carestream's Comprehensive Ethics & Compliance Program is also consistent with the Department of Health and Human Services, Office of Inspector General "Compliance Program Guidance for Pharmaceutical Manufacturers" and with the Medical Imaging Technology Alliance (MITA) Code of Ethics, which is substantially similar to the AdvaMed Code on Ethical Interactions with Health Care Professionals.

Annual Spending Limit Pursuant to California Health & Safety Code § 119402(d)(1)

For purposes of complying with California Health & Safety Code § 119402(d)(1), Carestream has established an annual per person spending limit of \$2,000 for promotional items and activities provided to healthcare professionals licensed in California. Carestream frequently interacts with healthcare professionals to provide valuable educational and scientific information about Carestream products and patient care. In connection with these interactions, Carestream may provide modest meals to facilitate educational and scientific discussions and presentations. Carestream may also occasionally make available to healthcare professionals items that are intended to benefit patients such as anatomical models, textbooks or medical journals. Any promotional items or meals that are provided to healthcare professionals must also comply with Carestream's Business Conduct Guide and the MITA Code of Ethics. Financial support for continuing medical education events, as well as fair market value payments for legitimate professional services like consulting, speaking and research, are excluded from this annual spending limit.

Carestream's Annual Declaration of Compliance for Purposes of California Health & Safety Code §§ 119400 – 119402

Carestream Health, Inc. has implemented a Comprehensive Ethics & Compliance Program in accordance with the requirements of California Health & Safety Code §§ 119400 – 119402. As of July 1, 2016 Carestream hereby declares in good faith that it is, in all material respects, in compliance with its Comprehensive Compliance Program and the requirements of the California Health & Safety Code. Unless otherwise stated, this annual declaration is effective as of January 1st through December 31st of each year (the "Declaration Period".)

Carestream's Ethics & Compliance program will be assessed on an annual basis to ensure it meets all statutory requirements. Please contact us at CorpCompliance@carestream.com or via our Business Conduct Helpline at 1-888-245-6805 to:

- request a description of our Comprehensive Compliance Program or a copy of this compliance declaration; or
- report an incident that you believe is in violation of this policy.