



SUPPLIER

CODE OF CONDUCT

Dear Supplier:

We have the privilege of making a positive difference for millions of people every day by providing those we serve with the products and services they need to improve and save lives. Our continued success in performing this important work depends on our ability, along with our suppliers, to reinforce our company's uncompromising commitment to integrity, doing business sustainably, the health and safety of our people and our resilience despite the different types of crises many businesses face today. In so doing, it unites us in a common purpose to build upon our reputation as a trusted leader in imaging and non-destructive testing systems.

As a Carestream Health, Inc. Supplier, you are critical to bringing our products and services to market, vital to our business success, and a trusted partner. To promote the growth of our business and our market share over the long term, a strong compliance program is key. We must conduct business in the right way and in accordance with the law and applicable industry standards of ethics in order to preserve our reputation.

This *Supplier Code of Conduct* provides an overview of our legal and ethical company requirements. Please review the Guide and keep it available for future reference. If you have questions about your responsibilities and obligations, please take the time to discuss them with your Carestream commodity manager or business contact.

Thank you for being such a valued part of the global team dedicated to innovation that's life changing.



Todd Clegg
Chief Executive Officer

SUPPLIER RESPONSIBILITY OVERVIEW:

Each Supplier is responsible for transacting business honestly, with integrity, and in accordance with all applicable laws and regulations. Suppliers must honor the terms and conditions of Carestream Health, Inc. contracts and/or purchase orders.

These responsibilities include:

- Complying with all anti-corruption, trade sanction, cybersecurity, data privacy, environmental, health and safety, human rights, and any other laws applicable to our business in the countries you reside and the industries you represent.
- Maintaining the highest ethical standards in dealings with public officials and government employees.
- Respecting the rights of others, including human rights and labor laws and employee health and safety.
- Refraining from offering to any Carestream employee any money, gifts, loans, rebates, employment, or other benefit which could create a potential conflict of interest, and promptly disclosing any apparent or actual conflict.
- Safeguarding any Carestream assets entrusted to you, including maintaining confidentiality of nonpublic information.
- Honoring the terms and conditions of Carestream contracts.
- Maintaining accurate books and records.
- Assuming social and environmental responsibility.
- Having a company code of conduct or other company policies that at a minimum covers the same topics addressed in this Code.
- Requiring sub-parties (your own suppliers and vendors) to follow similar policies and monitoring their compliance with these responsibilities.
- Completing Carestream's supplier diligence program (when applicable) and reporting to Carestream any significant company changes (e.g., ownership changes, government affiliations, etc.).
- Reporting promptly all suspected fraud, misconduct, violations of law or anything stated in this document to your Carestream contact or through our business conduct helpline at www.carestream.ethicspoint.com.
- Being cooperative and truthful in the course of all your business interactions and any investigations or audits by Carestream or regulatory authorities.

LABOR AND HUMAN RIGHTS

Carestream Health, Inc. is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. Carestream and its Suppliers must comply with all applicable labor laws that safeguard worker's rights under national and international labor and social security laws and regulations.

Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There should be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities. For workers departing from their country of origin and as part of the hiring process, workers should be provided with a written employment agreement in their native language. All work should be voluntary, and workers should be free to leave work at any time or terminate their employment. Confiscation of workers' identity documentation is prohibited.

Child Labor

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Implement an appropriate mechanism to verify the age of workers.

Working Hours, Wages and Benefits

Working hours are not to exceed the maximum set by local law. Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

Workers and/or their representatives should be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

Humane Treatment

There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements should be clearly defined and communicated to workers.

Non-Discrimination/Non-Harassment

Companies should not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

For more information on Carestream's Supplier Diversity program, [click here](#).

HEALTH AND SAFETY

Carestream Health, Inc. recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Carestream also recognizes that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

Health and Safety

Worker potential for exposure to health and safety hazards (chemical, mechanical, physical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified and assessed, mitigated using the Hierarchy of Controls, namely eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards.

Access to sanitary facilities and potable water should be provided. Workers should be encouraged to raise any health and safety concerns without retaliation.

Health and Safety Communication

Provide workers with appropriate workplace health and safety information and training in a language the

worker can understand for all identified workplace hazards to which workers are exposed. Health and safety related information should be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Enforce policies that prohibit use in the workplace illegal weapons, alcohol, and illegal drugs and other controlled substances.

Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills should be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures should focus on minimizing harm to life, the environment, and property.

Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

ENVIRONMENTAL RESPONSIBILITY

Carestream Health, Inc. is proud of our commitment to promoting a sustainable environment in everything we do. Our commitment focuses on the use of life cycle thinking in product development and in manufacturing design to prevent incidents and conserve natural resources.

Carestream recognizes that environmental responsibility is integral to producing world-class products. Carestream and its Suppliers are responsible for following Environmental laws that apply to our business and support implementation of EHS policies and procedures to:

- Ensure compliance with both internal and external environmental Global requirements
- Identify and manage Environmental risks.
- Drive continuous improvement.

Suppliers should identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources within their manufacturing operations, while safeguarding the health and safety of the public.

Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. Natural resources, including water, fossil fuels, minerals, and virgin forest products, are to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

Hazardous Substances and Waste

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle waste in accordance with applicable regulations.

Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Conduct routine monitoring of the performance of its air emission control systems.

Materials Restrictions

Adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. Maintain documentation (testing and/or supplier documentation) regarding compliance with materials restriction requirements and respond to customer inquiries upon customer request.

Water Management

Suppliers should implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. As required, conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance. Manage wastewater and stormwater in accordance with applicable water regulations.

Energy Consumption and Greenhouse Gas Emissions

Energy consumption and greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions. Suppliers should look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

Sustainability

Through our sustainability program, we seek to minimize risks associated with global environmental,

social, and economic issues and generate cost savings from projects that reduce our negative environmental and social impact.

Our sustainability program supports our stakeholders' interests and expectations and is risk-based to address the potential impact of these issues on the business. Our stakeholders include employees, shareholders, customers, suppliers, the communities, and countries where we do business, and the world in which we live. Among other things, our commitment is a formal commitment to conscientious citizenship.

For more information on Carestream's Sustainability program, visit www.carestream.com.

ETHICAL BUSINESS PRACTICES

Because Carestream Health, Inc. is a medical device company, our interaction with customers, suppliers and government officials are highly regulated and subject to industry standards of ethics.

To meet social responsibilities and to achieve success in the marketplace, you should uphold the key aspects of these rules as summarized below:

Prohibition of Bribery and Corruption

The highest standards of integrity are to be upheld in all business interactions. Carestream Suppliers are prohibited from giving, promising to give, offering to give or authorizing someone else to give anything of value, either directly or indirectly, to any government official, healthcare professional or other third party to improperly influence any act or decision, secure an improper advantage or obtain or retain business for Carestream. Facilitation payments are considered a form of bribery and are prohibited.

Monitoring, record keeping, and enforcement procedures should be implemented to ensure compliance with anti-corruption laws.

Prohibition of Money Laundering and Terrorist Financing

Disguising the origin of money or other assets obtained from criminal activities and using them for legitimate business purposes is prohibited as an act of money laundering. Additionally, Carestream does not support terrorism either via financially or via other means, such as company products. Money received from your own customers should come from verifiable, traceable, and legitimate sources.

Conflicts of Interest

Carestream has strict policies requiring our employees to avoid any situation that may involve a conflict between their personal interests and the interests of Carestream. To help support these policies, Suppliers may not seek to obtain any direct or indirect personal profit or gain from Carestream through a relationship with a Carestream employee. If you have a personal, familial, or other relationship with an employee, you and the employee should disclose it to Carestream for follow up and resolution.

We at Carestream appreciate and value your continued support of our business throughout the year, as well as the cooperative spirit between our companies. Relationships with our suppliers should be based on quality and dependability of goods and services purchased, fair pricing and prompt delivery, and a commitment to conduct business in an ethical manner. The result ensures fair and impartial dealings with our suppliers and best value to our customers.

Gifts

The holiday season often prompts some suppliers to express their goodwill by offering gifts to our employees. To avoid any possibility of misunderstanding, embarrassment, or perception of favoritism, Carestream's policies do not permit our employees to accept gifts of gratuities in any form, from any supplier, for themselves or their families.

Accurate Books and Records

All business dealings should be transparently performed and accurately reflected on your company's business books and records. Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Fraud and Theft

All organizations are vulnerable to acts of fraud and theft. Fraud and theft can include bribery, kickbacks, improper billing schemes, skimming, check tampering, expense reimbursement abuse, and other corrupt activities. Carestream has a zero-tolerance policy for fraud and theft, and we will not hesitate to act and to refer such cases to law enforcement authorities for prosecution. The best safeguards against fraud and theft are strong internal controls and the vigilance of Suppliers preventing, detecting, and reporting improper activity. Report immediately to your Carestream representative any cases of fraud or theft involving Carestream.

Antitrust and Fair Competition

Anti-trust or competition laws impose important requirements related to agreements and discussions with competitors. You should not participate in any formal or informal discussion, understanding, agreement, plan, or scheme with any competitor that involves improper collusion on prices, price levels, territories, or customers to be served. If you regularly deal with customers or competitors, you should be familiar with relevant antitrust and fair competition laws.

Import/Export/Sanctions

In conformance with applicable customs and import/export laws, suppliers and subsidiary suppliers should use its best efforts to produce, store, handle and ship products in a safe and secure manner, and to avoid any unauthorized access to the products which are being stored or transported on behalf of Carestream. Carestream's suppliers, any person acting on behalf of the Supplier, or a supplier's owner shall not be : (i) listed on any Sanctions List; (ii) located or organized in any country or territory subject to country or territory-wide Sanctions; (iii) a person with whom Carestream is prohibited from engaging with by reason of any Sanctions; or (iv) otherwise a subject of Sanctions. Sanction Countries currently include, but are not limited to Iran, Syria, Crimea Region, Cuba, and North Korea.

Confidential Information and Intellectual Property

Confidential information is a vital company asset. This can include information about our business plans, investment opportunities, acquisition and divestiture plans, financial performance, and intellectual property. Other types of confidential information or trade secrets include property we have created or obtained for the Company's exclusive use, such as originals and copies of customer lists, files, personnel information, formulae, manufacturing know-how, reference materials and reports, computer software, and data processing systems and databases. Put simply, confidential information is anything that is not generally known by people outside of the Company. You are expected to maintain the confidentiality of any such information, and to use it only for legitimate Company purposes.

Data Privacy

Carestream and its Suppliers should respect the privacy rights of everyone you do business with, including your suppliers, customers, consumers, and employees. You are responsible for complying with all relevant data privacy and information security laws and regulatory requirements when handling (collecting, storing, processing, transmitting or sharing) the personal data of others, including patient information or other customer confidential information when performing services for Carestream.

Cybersecurity

Carestream takes a serious view on cybersecurity as this is crucial in safeguarding and ensuring the confidentiality, integrity, and availability of our information as well as to prevent fraud and theft. We expect our Suppliers to take adequate measures to ensure that their IT systems are properly secured and appropriate Disaster Recovery and Incident Response Plans are in place and tested. This should be done by adhering to cybersecurity best practices, adopting and following proven cybersecurity frameworks and standards, and utilization of external assessments to validate their cybersecurity program.

It is also our expectation that our Suppliers ensure their suppliers and other business partners follow similar effective strategies to secure the entire supply chain. Carestream may assess the security posture of our suppliers through questionnaires and cybersecurity ratings. Any breach or suspected breach of cybersecurity that involves any connection with Carestream should be reported immediately to the Carestream representative.

Conflict Minerals

Adopt a policy and exercise due diligence on the source and chain of custody of tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk

Areas or an equivalent and recognized due diligence framework.

Regulatory

As a manufacturer of medical devices, we have both an ethical and legal responsibility to ensure our products used around the world are safe and effective in their intended use. Adherence to these regulations and standards is built into Carestream's processes and procedures. Every employees' attention to medical device compliance allows us to pass regulatory health agency audits and successfully market our products.

When required, our Suppliers will agree to comply with global and/or local regulatory requirements, including maintaining certifications that demonstrate compliance.

Prohibition on Entertainment with Healthcare Professionals and Government Officials

Providing entertainment or recreation such as tickets to theater or sporting events, to government officials, or healthcare professionals is strictly prohibited. Such entertainment or recreational activities may never be offered regardless of the value of the items, or whether the entertainment or recreation is secondary to an educational purpose.

Government Relations

Everyone representing Carestream should adhere to the highest standards of ethical conduct in all interactions with government officials, including employees and candidates for public office. Providing gifts, meals and entertainment to government officials is legally prohibited in many countries. Where meals with government officials are permitted, such meals should be modest, infrequent, and subservient to a business prohibited in many countries. Where meals with government officials are permitted, such meals should be modest, infrequent, and subservient to a business meeting, product demonstration or training. Many governments around the world regulate purchasing products from private suppliers. These laws are intended to assure that governmental entities obtain goods and services at fair and competitive prices. When selling Company products to government procurement

agencies, you should comply with all applicable procurement laws.

When interacting with government customers, be sure to consult with your internal compliance or legal department to understand applicable laws (e.g., Foreign Corrupt Practices Act FCPA), UK Bribery Act), regulations, and policies governing such interactions.

Response to Official Inquiries

Carestream requires you to be truthful and to refrain from making any false or misleading statements or otherwise engaging in misleading conduct in the course of any authorized external or internal investigation by, or on behalf of, our auditors, government or law enforcement officials, regulators, prosecutors or the courts.

BUSINESS CONTINUITY/RISK MANAGEMENT

We encourage our suppliers to implement their own written Code of Conduct and to flow down the principles of the Code to their own sub-suppliers. Suppliers should adopt or establish a management system with a scope that is related to the content of this Code.

The management system should be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational and regulatory risks related to this Code. It should also facilitate continual improvement in these

areas and in building resilience in the wake of force majeure situations, cybersecurity breaches, and other external factors that may impact business continuity.

Suppliers will notify Carestream Health, Inc. in writing of changes in the product including raw materials, equipment, test processes, critical personnel, or service provided that impact form, fit or function so that Carestream can determine if the changes may affect the quality and/or compliance of a Carestream finished product.

REPORTING CONCERNS/SPEAKING UP

Helpline Reporting

It is important to have a communicated process for your personnel to raise any concerns without fear of retaliation. The confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law.

If you suspect violations of law or anything in this Code, please contact your Carestream Health, Inc. representative. Or, if you feel uncomfortable to do so, you may report through our Company Business Conduct

Helpline at www.carestream.ethicspoint.com, which is operated by an independent company called NAVEX. It is available 24 hours a day to capture concerns you do not feel comfortable raising directly with the Company.

Use this QR Code with your phone, or file a report at the Business Conduct Help Line's secure website at: www.carestream.ethicspoint.com



For further information about Carestream, please visit: www.carestream.com.