



Carestream International Code of Conduct

MESSAGE FROM OUR COMPANY

Dear Colleagues:

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.

It is because of the importance of what we do that we must do everything with integrity and to a high degree of excellence. **The work we do matters and the way we do it matters just as much.** Our Code of Conduct is the defining document on the way we do business, setting forth standards of business conduct and expressing our uncompromising commitment to integrity.

All of us; employees, contractors, temporary staff and anyone working for Carestream Healthcare International Company Limited and its affiliates ("Carestream International") must read, understand and follow the Code of Conduct. It is equally important that we feel comfortable speaking up, asking questions, and reporting concerns when we suspect the Code is not being followed. For a more in-depth understanding of subject areas addressed in the Code of Conduct, consult Carestream International policies and procedures. If you have questions about your responsibilities and obligations, discuss them with your manager or Human Resources Business Partner (HRBP).

We are united in a common purpose—to create a great place to work and build upon our company's reputation as a trusted leader in imaging and non-destructive testing systems. Thank you for taking the time to familiarize yourself with the Code of Conduct and for being part of the global team dedicated to Doing the Right Thing the Right Way.

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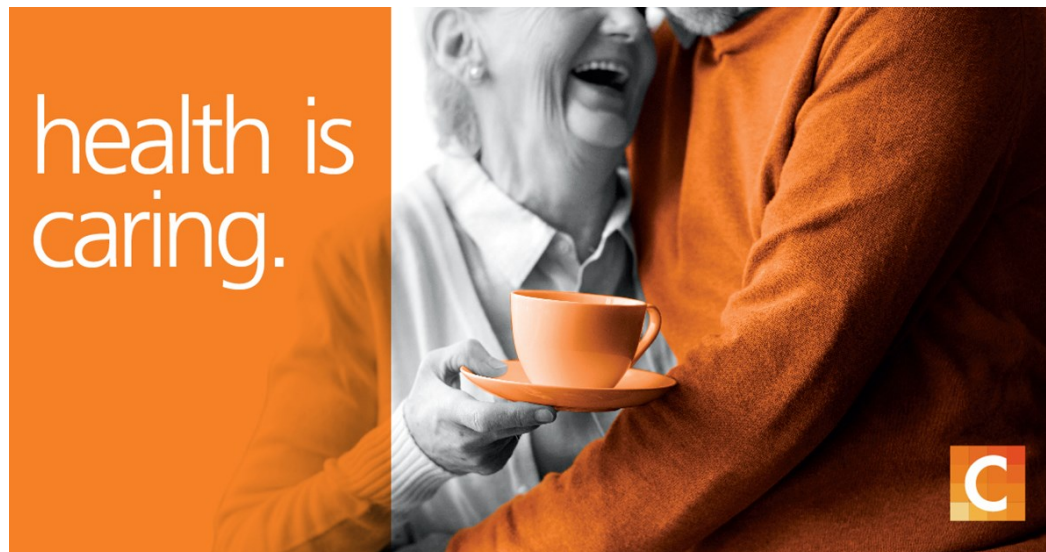
OUR UNWAVERING COMMITMENT

Carestream International is a company with heart. The work we do matters.

From developing X-ray products for general radiography, intensive care patients, pediatrics, sports medicine, dental practices or veterinary hospitals, to providing non-destructive testing systems to help ensure that airplanes, bridges and pipelines are safe.

And it couldn't be done without our team of hard-working, talented and caring individuals. **Each of us has a responsibility to uphold our values, protect and enhance Carestream International's reputation, comply with the law, respect each other, and act as an ethical company by doing our jobs in accordance with the highest ethical standards.**

As a global company we conduct business in a very complex environment. We understand that laws and regulations vary from country to country and can vary even more at a local level. Because we are a global company, our employees and our third parties are subject to different laws in addition to their local laws. Knowing which laws to follow can sometimes be confusing and even conflict at times. In general, know the local laws that apply to you. Contact regional counsel should questions arise. Seek out additional guidance from available sources, including other colleagues, continuing training and education, and relevant policies and procedures.



OUR UNWAVERING COMMITMENT

All of us at Carestream International, employees, contractors, temporary staff and those working for Carestream International are required to conduct business in an ethical manner and in accordance to this Code of Conduct. Together, we represent what Carestream International stands for, our values in actions and our reputation in the marketplace. It is equally important to note the standards of ethical conduct outlined in our Code extend to anyone conducting business on our behalf, including our Suppliers (Supplier Code of Conduct), Intermediaries (Code of Conduct for Business Partners) and our contingent workers.



It is the commitment to the way we do business that makes Carestream International successful and be a place where like-minded individuals want to work. The Code of Conduct is not just for the protection of our company but also our employees.

Policies and principals referenced in this Code of Conduct are mandatory. If you encounter a situation, however, that requires a waiver from or modification of the requirements of this Code, such as an threat to your personal safety, discuss the situation with your direct supervisor and the appropriate functional leaders, such as HR, Compliance, Legal, or Controller's group in order to appropriately address the situation. If a waiver or modification is deemed appropriate, document the situation in writing, including the circumstances justifying the request. This must be reviewed and approved by Carestream International's Chairman, President and CEO, General Counsel and the Board of Directors. Violations of the Code of Conduct are grounds for disciplinary action. Additionally, such violations could result in legal action against the Company and against you as an individual.

OUR SHARED VALUES

This Code of Conduct is based on Carestream International's commitment to conducting its business in accordance with five key values we all share. Along with our mission and vision, these values define the type of company we want to be and guide how we will get there. They provide us a common framework for decision-making and a shared way of thinking and working. Even if complying with our Code of Conduct results in lost revenue, these "opportunity costs" are the best investment to make in solidifying Carestream International's reputation as an industry leader and an organization with an uncompromising commitment to integrity.

Our Mission

We provide customers with the highest value products and services through engaged employees who drive continuous innovation and operational excellence.

Our Culture

We aspire to be a culture of innovative leaders. All are empowered to challenge conventional thinking, take calculated risks and endeavor to make the world a better place, for our customers, their patients, our communities and ourselves.

Our Values

Starting with our greatest resource, **Engagement and Empowerment** is about creating an environment where all are supported, valued, and appreciated. We drive a **Customer First Mentality**, placing customers at the beginning and end of everything we do. We **Do the Right Things the Right Way** to improve the customer experience through trust, respect, and integrity with a **Bias for Action**, making data-driven decisions quickly and committing ourselves to disciplined execution. We recognize that not all good decisions will have positive outcomes, and therefore we foster thoughtful risk-taking and learning from our failures, with a culture of **Ownership and Accountability**.



YOUR PERSONAL COMMITMENT

Know the laws and policies that apply to you.

Operate with honesty and integrity.

Uphold our values and protect our reputation.

Comply with the laws, regulations and standards that apply to Carestream International.

Complete Carestream International mandated training.

Seek help if you have questions.



Do the Right Things The Right Way

When you have a difficult decision to make, ask yourself the following:

- If you proceed, would you feel bad, embarrassed or at least uncomfortable about your action?
- Would people question your professionalism or personal ethics if your action is made known?
- Is the action at odds with Carestream International's Code of Conduct or other Carestream International policies?
- Does it benefit only a certain individual or group instead of Carestream International as a whole?
- Is the action illegal?

If you answer 'No' to all of these actions, then the decision to proceed is most likely okay. If you answer 'Yes' to even one of these questions, **don't do it**. There could be serious consequences to you or Carestream International.

Managers Must

Managers are required to create and sustain a strong ethical culture in which employees understand their responsibilities and feel comfortable raising concerns. Managers should also demonstrate their personal commitment to compliance by:

- Leading by example;
- Providing education to employees on Carestream International policies and applicable laws;
- Encouraging employees to raise compliance and ethics concerns; and
- Taking employees' concerns seriously.

REPORTING CONCERNS — SPEAKING UP

If you ever have a question about the right thing to do, or you observe someone doing something wrong, there is always a place for you to go to seek assistance. **You have a responsibility to share your concerns** by reporting right away even if you are not sure misconduct has actually occurred. Your manager and your local HRBP can often help you to quickly resolve many workplace issues. In addition, you can always contact Compliance, Legal, Corporate Security, or the Controller's Group.

We Do Not Tolerate Retaliation

Our Reporting Concerns/Non-Retaliation policy strictly prohibits retaliation of any kind against anyone who ask questions, raise concerns, report misconduct in good faith or assist in an investigation of any reports made. We understand retaliation may take many different forms ranging from job reassignment to a firing. Anyone engaging in retaliation against others will be subject to disciplinary action. While we take reports very seriously, this policy does not protect someone who makes false reports, lies to investigators, or makes an intentional false report to harm someone else.

Key Policies and Resources:

Reporting Concerns / Non-Retaliation (Whistleblower)
www.Carestream.Ethicspoint.com



You may also anonymously report a concern through the [Business Conduct Helpline](#).

The Business Conduct Helpline, which is operated by an independent company called NAVEX, is available 24 hours a day to capture concerns you do not feel comfortable raising directly with Carestream International. Answers to commonly asked questions are also available on the site.

The Business Conduct Helpline can be reached as follows:

- Click the following link [Business Conduct Helpline](#) or type www.Carestream.Ethicspoint.com in your browser
- Call toll-free using the phone numbers for your respective country available on the site
- Using your mobile phone, open the camera app and hold your phone up to this QR Code





Our Employees





Diversity, Equity and Inclusion

People are the heart of Carestream International. Our commitment begins with caring for our colleagues and the valuable and impactful work we do every day.

Aligned with all our values, each of us has a **fundamental obligation to respect the rights and dignity of every person** and to support diversity and inclusion of people, cultures and ideas in the workplace. We must treat everyone fairly and help each other achieve our collective and individual goals.

As a company, we do not discriminate in our hiring or treatment of employees, suppliers, or customers, regardless of an individual's race, color, gender, age, national origin, citizenship, disability, religious beliefs, marital status, sexual orientation, or other characteristics protected by law. We support a workplace open to the free expression of ideas, where diversity is valued, and all are empowered to challenge conventional thinking, take calculated risks and endeavor to make the world a better place, for our customers, their patients, our communities and ourselves.

Key Policies and Resources:

- Security Policy
- Equal Opportunity Employment Policy (EOE)
- Regional Employee Handbooks



Workplace Safety and Security

Ensure a safe and healthy workplace by following security, safety, and health rules, looking out for one another, and promptly reporting any accidents, injuries or unsafe conditions.

Consistent with these responsibilities, it is never appropriate to:

- Behave in violent or threatening manner;
- Engage in the unauthorized use, possession, distribution, purchase or sale of drugs or alcohol while on Carestream International premises or engaged in business activities;
- Conduct business or operate Carestream International equipment while under the influence of any substance that may impair your judgment or otherwise present a hazard to you or others; or
- Bring weapons onto Carestream International property without proper approval from Corporate Security.

Harassment (Bullying)

Carestream International is committed to maintaining a workplace free from harassment. Harassment may take many forms, including verbal, physical, or visual. It can be sexual in nature (unwanted touching, propositions, sexually oriented images or gestures) or bullying (spreading gossip or malicious rumors, using intimidation, yelling or humiliating someone). We must conduct ourselves professionally at all times no matter whether we are working in the office or remotely, traveling on business or using social media.



Conflicts Of Interest

We all have a duty to act in Carestream International's best interest and to avoid engaging in activities that conflict or even appear to conflict with Carestream International's interests. Conflicts of interest can arise when your activities and relationships outside of work interfere with, or appear to interfere with, your ability to do your job or exercise independent judgment when making decisions for Carestream International.

If you are in a situation in which there may be a real or perceived conflict of interest, you must complete a Conflict of Interest Disclosure Form. Share the Form with your manager and seek their guidance on steps you can take to resolve the conflict. Many conflicts can be resolved in a way that protects Carestream International's interests. However, you should avoid the conflict until your manager has either determined no conflict exists or permits you to engage in the activity. Conflicts of Interest Disclosure Forms are to be routed to the Compliance Department or HR depending on the nature of the conflict.

Key Policies and Resources:

- Conflict of Interest Policy
- Frequently Asked Questions
- Conflicts of Interests Disclosure Form
- 5-minute training video



Examples of conflicts of interest can include:

- Accepting cash, lavish gifts, gift cards, stock, loans, loan guarantees or similar benefits from any person or company who is doing business or seeking to do business with Carestream International;
- Serving on the board of, owning more than a 1% interest, or working for an outside enterprise that does or seeks to do business with the Company (e.g., serving as a director, employee, officer, partner, or consultant);
- Acting as a broker, finder, consultant or intermediary for a third party in transactions involving Carestream International;
- Having family or friends who work at our suppliers, customers, other business partners or competitors and with whom you interact while conducting business on behalf of Carestream International;
- Hiring, supervising, or entering into arrangements with family members or friends; and
- Using any Carestream International property for personal gain, including exploiting business opportunities that you discover through the use of Carestream International property, information, or your position.



DID YOU KNOW?

Former employees have been terminated for accepting money from a customer in exchange for providing excessive discounts. Accepting such kickbacks is a serious violation of our Conflicts of Interest Policy and is not permitted.



Using Social Media for Promotion of Carestream International and/or Carestream International Products

Carestream International employees may use social media as part of their jobs to strengthen the company's brand and to connect with customers, partners and industry influencers more directly. Additionally, employees may find opportunities in their use of social media to listen to or respond to questions about Carestream International and/or our products. Listening to and engaging in social media conversations related to our business helps us better understand our customers' needs, while helping us generate awareness for our products and services.

Carestream International supports employees' use of social media to represent Carestream International—as long as you are authorized to do so, are thoughtful and respectful, and follow these rules of engagement.

- All Code of Conduct standards still apply.
- Understand differences between personal and business use, as well as how personal use could impact Carestream International's brand, reputation or commercial interests.
- Identify yourself and affiliation with Carestream International when using social media for business purposes.
- Be honest. Be yourself.
- Don't attack others.
- Follow FDA and other regulatory rules for content. Report complaints and questionable content.
- Never disclose confidential information.

Consider social media use as a permanent record of your words and actions, even if you later detract or delete a post. Therefore, carefully consider any messaging before you post it. Reach out to your Carestream International regional marketing representative with any questions or concerns.

Like regulatory organizations in many other countries, the U.S. FDA treats social media content as promotion and advertising and actively monitors social media discussions. FDA rules prohibit making unsubstantiated claims and promoting off-label use of products. **Use the same discretion in materials posted via social media required as in any other communication forums.** Medical device manufacturers have been penalized for not following the rules for promotion and advertising content on social media. When in doubt, check with Regulatory Affairs.

Personal Use of Social Media

Employees' personal use of social media is generally a personal matter. When an employee has listed Carestream International as their employer, such as in their profile for a social media platform or account, Carestream International's customers and business partners may perceive the employee's personal social media messaging as a reflection of Carestream International. Employees need to be mindful of the standards of our Code of Conduct when they have associated their personal social media account(s) with Carestream International.



Key Policies and Resources:

Media Interactions (Press) and Social Media



Photography and Recording for Carestream International Use

Demonstrating and celebrating our evolving culture is important; however we must take care when recording and taking photos of individuals at company events. Therefore, at events on Carestream International property, pictures and videos may only be taken in common areas and by individuals designated by Employee Experience or Central Marketing.

These images may be used internally and at times externally on social media. Employees may request that their photo not be taken or that any photos including them not be used and/or deleted. Any such request should be made to the organizer of the event or photographer at the time of recording or for existing photos, any time thereafter. Consent will be obtained when using any images for commercial purposes.

For more information regarding other photos and recordings involving company property and assets, see ICS – 11 Protection of Physical and Intellectual Assets.

Media Interactions

Carestream International's positive public reputation is a valued asset, based in large part on the quality of its products and on the achievements of its people. The company's reputation also depends on communications that accurately depict the company, its business activities, market focus, products and services.

- Carestream International speaks with "One Voice." You should not initiate contact with representatives from the media to discuss Carestream International business.
- All media inquiries regarding Carestream International received by individuals will be referred to the Public Relations Manager in Global Marketing or to the designee(s) in the regions.

Political Activity

Carestream International does not make political contributions, including in-kind contributions such as the use of corporate facilities. Since your political activities could be attributed to Carestream International, you must obtain prior written approval from the General Counsel before engaging in any political activity that occurs during working hours or on Carestream International property, including fundraising.





Our Marketplace





Preventing Bribery and Corruption

You must comply fully with all applicable anti-corruption and anti-bribery laws when interacting with government officials, healthcare professionals, customers, and other third parties.

Do not pay a bribe. You 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, customer, healthcare professional or other third party to improperly influence any act or decision, reward, secure an improper advantage or obtain or retain business for Carestream International. Additionally, the following are also prohibited

- Making indirect payments
- Using personal funds to do any of the above
- Asking, allowing or enabling relatives, friends, or other associates to do any of the above

DID YOU KNOW?



- Even a technician at a public hospital may be considered a government official under anti-bribery laws.
- Gifts or payments of small value can be considered illegal bribes if the intent is to use such small gifts to improperly influence another.
- Individuals can be subject to imprisonment for violating anti-bribery laws.
- Carestream International can be fined and banned from doing business in a particular country if we violate anti-bribery laws.

Select third parties carefully. Carestream International is directly responsible for the actions and behaviors of third parties who conduct business on our behalf. This means you must follow our Intermediary Management Program and monitor them continuously to ensure they comply with our Anti-Corruption and Anti-Bribery policy as well. Keep accurate books and records at all times and monitor funds paid to third parties to ensure they are not used for improper purposes.

Do not accept bribes or kickbacks. You may not accept payments or anything of value from a third party that could or may have the appearance of improperly influencing your actions or decisions you make on Carestream International's behalf, or that would otherwise violate the Conflicts of Interest Policy.

“Facilitation” or “grease” payments made to government officials or private businesses in order to expedite or secure performance of routine governmental actions (e.g., clearing goods through customs, or issuing permits) are prohibited.



Key Policies and Resources:

- Anti-Corruption and Anti-Bribery Policy
- Conflict of Interest Policy
- Regional Sales and Marketing Codes
- Code of Conduct for Business Partners
- Supplier Code of Conduct



Anti-Money Laundering / Anti-Terrorism

Money laundering is a process where funds generated through criminal activity – such as terrorism, drug dealing, tax evasion, human trafficking, and fraud – are moved through legitimate businesses in order to hide their criminal origin. **We comply with anti-money laundering, financial crime, and anti-terrorism laws** in all countries in which we operate.

Carestream International will conduct business activities with only reputable customers involved in legitimate business activities and who derive funds from legitimate sources. We do not accept Third Party Payments unless authorized as an exception in accordance with our Third Party Payment policy.

International Trade

We are a global company that engages in international trade each and every day. We must know and follow applicable export laws and regulations no matter where we are conducting business. Additionally, all employees involved in the sale, marketing, distribution, transfer of technology or movement of materials across international borders must:

- Be familiar with and abide by all applicable laws and Carestream International policies regarding international trade restrictions;
- Seek the assistance of the Import/Export Regulatory Compliance Department or the Legal Department whenever any questions arise; and
- Encourage employees to raise compliance and ethics concerns.

Global Sanctions Compliance

Carestream International is obligated to follow the applicable guidance when interacting with Sanctioned Countries. Our Global Sanctions Compliance policy explains both the scope of activities that may be impacted by sanctions and who at Carestream International is responsible with respect to:

- conducting business with countries or jurisdictions subject to comprehensive, sectoral, or other sanctions;
- our screening protocol for sanctioned countries or jurisdictions and targeted sanctions;
- training.

Anti-Boycott Compliance



Key Policies and Resources:

Global Sanctions Compliance policy
List of Sanctioned Countries and Jurisdictions
Third Party Payment (Anti-Money Laundering) policy

Some applicable laws prohibit cooperation with certain boycotts imposed by some countries against others. Promptly report to the Compliance Department any requests received from customers, suppliers or others to participate in a boycott against other people, companies or countries.



Antitrust and Fair Competition

Competition laws (referred to as antitrust law or fair competition law) impose important requirements related to agreements and discussions with our competitors.

You must 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, competitive bids, or customers to be served.

Employees are required to:

- Communicate the company's products and services in a manner that is fair and accurate, and that discloses all relevant information.
- Consult the Legal Department before engaging in any new practice that may affect fair competition.
- Refrain from price fixing, bid rigging, and any other anti-competitive activities.
- Use only publicly available information to gather competitive intelligence.
- Be careful at conferences and trade shows.
- Be familiar with relevant competition laws that are summarized in our Antitrust Policy.
- Report immediately any possible violations of fair competition practices.



Key Policies and Resources:

Antitrust Policy



Antitrust law for Hiring

Antitrust laws extend to hiring practices under certain laws. HR professionals and Hiring Managers should avoid entering into agreements regarding terms of employment with other companies that compete to hire employees. It does not matter whether the agreement is informal or formal, written or unwritten, spoken or unspoken. Parallel conduct and evidence of discussions may lead to an inference that an illegal agreement was reached.



Regulatory

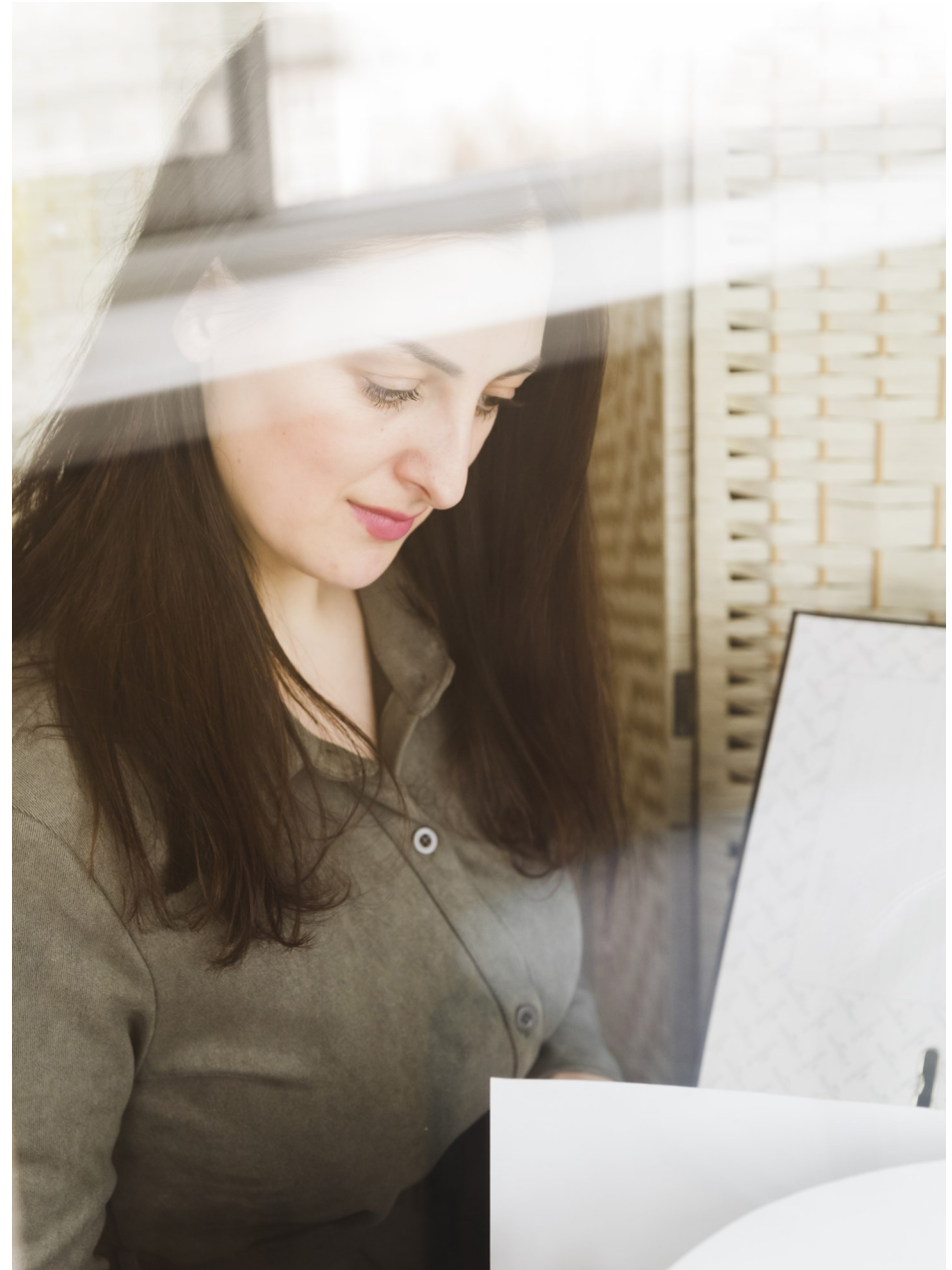
As a manufacturer of medical devices, we have both an ethical and legal responsibility to ensure our products used around the world are safe and effective in their intended use. Adherence to these regulations and standards is built into Carestream International's processes and procedures. Your attention to medical device compliance allows us to pass regulatory health agency audits and successfully market our products. We are required by law to provide honest and accurate labeling of our products. **Most, if not all, advertising qualifies as labeling.**

Carestream International maintains detailed requirements on the rules and regulations for product labeling (including marketing and promotional materials) in MasterControl.

Key Policies and Resources:



- Security Product Labeling Requirements (TRN-000010)
- Regulatory Guidance Governing Marketing and Promotional Materials / Labeling (TRN-000552)
- Corporate Quality System Standard Operating Procedure (SOP-000402)





Our Customers & Suppliers





While gifts and entertainment among business associates may be culturally acceptable ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. **Carestream International is committed to winning business only on the merits of our products, services and people.** At a minimum, we comply with all legal requirements for giving and receiving gifts, and entertainment. Additionally, as a medical device manufacturer, we follow industry codes of conduct, which require more conservative behavior on our behalf to align with industry standards. Consult Carestream International policies, procedures and Regional Sales & Marketing Codes for more detailed, country-specific guidance. Also, **third parties may never do what we cannot do ourselves.** We are liable for their actions. Ignorance is never a defense.

Question



Many of our competitors provide customers with gifts and entertainment that would violate our Code of Conduct. If we don't do the same, we will be at a competitive disadvantage. Are we prepared to risk losing business just to comply with the Code of Conduct?

Answer

Yes. Our company is defined by how we make hard choices. Regardless of what our competition is doing or the potential effect on our sales, we will not violate the law, our policies, or the Code of Conduct for personal or commercial gain. Our gifts and entertainment practices must be in-line with the Code of Conduct, the law and industry codes of the countries in which we do business.

Gifts, Meals and Hospitality

When acting on Carestream International's behalf, you may give or receive gifts and meals only if:

- It is permitted by law and in accordance with Company policy;
- The gift is pre-approved as part of a Carestream International approved program or, if a meal, it serves a valid business purpose;
- It is consistent with the company policies of the other party;
- It will not influence or appear to influence the independent judgment of the person receiving the gift or meal;
- The gift is reasonable, customary, and of small value;
- The meal is modest and provided in a manner and setting that is conducive to scientific, educational, or business discussions; and
- The expenditure is accurately recorded in the Carestream International's financial records.

Similarly, when interacting with customers, suppliers or other third parties do not:

- Ask for gifts, meals, or entertainment;
- Give or receive cash or cash equivalents (e.g., gift cards, stock options);
- Give or receive gifts of alcohol or tobacco;
- Give gifts or meals in exchange for or as a reward for the purchase, recommendation, or use of Carestream International products or services; and
- Provide an advantage to someone outside Carestream International in exchange for a gift or a meal.



Gifts, Meals and Hospitality Continued

If you are unsure whether a gift you are giving or receiving is appropriate and acceptable under Company policy, reach out to Corporate Compliance, Legal or Human Resources with questions.

Prohibition on Entertainment with Healthcare Professionals and Government Officials

Providing entertainment or recreation such as tickets to the 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. Additionally, you must never accept entertainment in exchange for or appear to improperly influence any act or decision.

Government Relations

Everyone representing Carestream International must 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 against the law in many countries. Where meals with government officials are permitted, meals must be modest, infrequent and subservient to a business meeting, product demonstration or training. Many governments around the world regulate purchasing products from private suppliers to ensure that governmental entities obtain goods and services at fair and competitive prices. When selling Carestream International products to government procurement agencies, you must comply with all applicable procurement laws. **Before giving anything of value to a government official, consult Corporate Compliance or the Legal Department to determine it is in line with local laws.**

Key Policies and Resources:

- Anti-Corruption and Anti-Bribery Policy
- Regional Sales and Marketing Codes





The Intellectual Property of Others

You must respect the valid copyrights of others in works such as printed materials, film, sound and video recordings, art, and computer software. You may not duplicate, distribute, or incorporate the copyrighted works of others in work for us, unless permissions are obtained. This includes translations, adaptations, or electronic forms of such works. Software used for Carestream International business must be covered by a license from the owner of the software.



Our Books and Records





Accounting and Reporting

Carestream International is required by law to report our financial results accurately and completely to third parties including investors and lenders. All financial reports, accounting records, environmental records, research reports, sales reports, expense accounts, time sheets, and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. **Improper or inaccurate accounting, documentation, and financial reporting are a violation of Carestream International policy and may also violate the law.**

Prohibited reporting practices include, but are not limited to:

- Intentional accounting misclassifications (e.g., capital versus expense);
- Sham transactions or channel stuffing (e.g., sales where Carestream International is obligated to buy back products, sales in excess of a customer's reasonable requirements);
- Improper acceleration, deferral, or recognition of expenses or revenues;
- Payments made with the understanding that they will be used for something other than their stated business purpose;
- Misrepresenting expenses made using a credit card or cash and reported to Carestream International for reimbursement by Carestream International via T&E reporting; and
- Assisting others, including customers and suppliers, with improper accounting and reporting.



Key Policies and Resources:

- Controller's Authorized Procedures and Delegation of Authority

We maintain a system of internal controls and disclosure controls to ensure:

- Transactions are executed in accordance with management authorization, and are properly recorded and posted;
- Assets are safeguarded from loss, unauthorized access, waste, fraud, and abuse;
- Resources are used in an efficient and effective manner;
- Required financial and non-financial information is timely and fully disclosed;
- Records, accounts and transactions are never falsified or mischaracterized;
- Sufficient evidence is obtained and retained to support the transaction; and
- All legal requirements are satisfied.

Responsibility for compliance with these policies rests with all employees, not solely with finance and accounting personnel. You should be familiar with the following internal controls and disclosure controls as they relate to your job.

- Documentation of key controls in the Control Self Assessments
- Written policies and procedures
- Supervisory review and monitoring;
- Auditing;
- Internal certifications and attestations; and
- Safeguards, such as segregation of duties, and passwords, to protect access to computer systems.



Records Retention

Carestream International's books and records are an important corporate asset and must be managed in accordance with our Records Management Policy. A key component is the Document Retention Alert ("DRA"), which is issued to prevent the intentional or unintentional destruction of records when we have a reasonable basis to believe we will be required to produce them in the future. Even in the absence of a DRA, you are strictly prohibited from altering, shredding or otherwise destroying or tampering with any records (written or electronic) that may be relevant to pending litigation or government investigation, audit, or regulatory proceeding.

Third Party Inquiries

We cooperate and comply with valid regulatory investigations and request for information, while also protecting the legal rights of Carestream International and our people. Refer all inquiries from government officials and lawyers representing third parties to a member of the Legal Department immediately. Inquiries from local legal or law-enforcement agencies should be referred to Corporate Security or to the Legal Department. Inquiries from environmental, health and safety agencies should be referred to the Environmental, Health and Safety staff, and inquiries from the Federal Drug Administration or other regulatory authorities should be referred to Regulatory. When in doubt about how to respond to third-party enquiries, contact the Legal Department.

Audits and Investigations

The General Counsel and the Corporate Compliance Department ("Corporate"), must be alerted of any **actual or potential investigation** that involves a **regulatory, anti-bribery laws** (including bribery and the improper recording of accounting records), or **antitrust violation** (i.e., collusion, bid rigging, price fixing, market division, etc.). Corporate should also be notified of any investigation involving a regional, cluster or country manager within the region as soon as the issue is discovered in order to receive instructions on how to initiate and proceed with the management of the matter. The notification must be early enough to allow Corporate to direct and participate in the initial decisions being made, except when urgency is necessitated because people are in imminent danger. In such instance, Corporate must be contacted as soon as practical.

Carestream International expects you to be cooperative and truthful when asked to participate in any internal or external audit or investigation.





Our Assets



PROTECTING OUR ASSETS



You are Carestream International best protection against fraud and theft.

We each are responsible for protecting and properly using Carestream International assets. You must comply with security programs to safeguard Carestream International assets against unauthorized use or removal, and you must report any suspected fraud, theft, or other misuse of Carestream International property. Those who seek to steal from Carestream International cannot do so in a workplace where people are vigilant about protecting against such criminal activities. Do your part by speaking up about potential fraud or suspicious activity when you see it.



DID YOU KNOW?

Since Carestream International was formed, people have lost their jobs and some former colleagues have even gone to prison for committing fraud at Carestream International.

The following are some activities that could be indicators of fraud or theft:

- Management overriding established controls, such as changing business practices near a period close;
- Selling products and services outside Carestream International's core businesses;
- A business unit reporting results or physical assets that Finance is unable to verify; and
- A vendor or partner adding a nominal value to the overall transaction in a business arrangement.

Fraud and Theft

Fraud and theft include bribery, kickbacks, improper billing schemes, self-dealing, expense reimbursement abuse, payroll or timekeeping abuse, and other corrupt activities. Carestream International has zero tolerance for fraud and theft and will take disciplinary action and refer such cases to law enforcement authorities for prosecution.

You can help prevent fraud and theft by:

- Remembering fraud and theft can occur anywhere;
- Monitoring the effectiveness of controls within your organization;
- Challenging those who attempt to override controls;
- Examining critical transactions carefully; and
- Speaking up when you see someone violate the rules.





Confidential Information

Confidential information is a vital Carestream International 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 Carestream International'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 Carestream International**. Sometimes, we get so accustomed to working with confidential information we forget how important it is to safeguard it. You are expected to maintain the confidentiality of any such information, and to use it only for legitimate Carestream International purposes.

Without management's permission, you may not share confidential information with those outside Carestream International including family members, or with employees who do not need to know it or who have not been cleared to receive it. Avoid discussing this information in public settings or leaving it out where others may see it. Your responsibility to maintain confidentiality applies whether working onsite or remotely.

Carestream International frequently enters into written confidentiality agreements with third parties that require us to protect their confidential information. All who become aware of this information are responsible for properly using and protecting it.

Signature Authority

Only authorized individuals can sign contracts on behalf of Carestream International and our subsidiaries. This authority is granted by name or by title, and only by authorizing resolutions adopted by our Board of Directors and the boards of our subsidiaries. You have been notified if you are authorized to sign legally binding agreements on behalf of Carestream International. However, if you are uncertain about whether you are authorized to sign agreements, please check with your management, local Controller, or the Legal Department.



Key Policies and Resources:

- Protection of Confidential Information
- Intellectual Property – Patents, Copyright and Trademark
- ICS 9a Data Classification



PROTECTING OUR ASSETS



Insider Trading

You may not use any nonpublic information obtained as a result of your employment for personal profit. Any information that is not generally available to the public and that a reasonable investor would consider when making investment decisions is considered material non-public information and may not be shared. During the course of your employment, you may come across insider information about companies we do business with, including our shareholders, some of which are publicly traded companies. In addition to your obligation to maintain the confidentiality of such information, you are also strictly prohibited from making any investments or encouraging others to do so, based on insider information. Information is “material” if it would affect a reasonable investor’s decision to buy, sell, or hold the stock in question. Information is “nonpublic” until it has been broadly disclosed publicly, typically by means of a press release.



PROTECTING OUR ASSETS



Use of Carestream International Property

You must obtain prior written authorization before removing Carestream International property or using it for purposes other than company business. Unauthorized removal of Carestream International property from our facilities is prohibited. Company property includes but is not limited to, equipment, facilities, information resources and business opportunities that you discover in the course of working for Carestream International. Carestream International products and services are also company property, as are your contributions to their development.

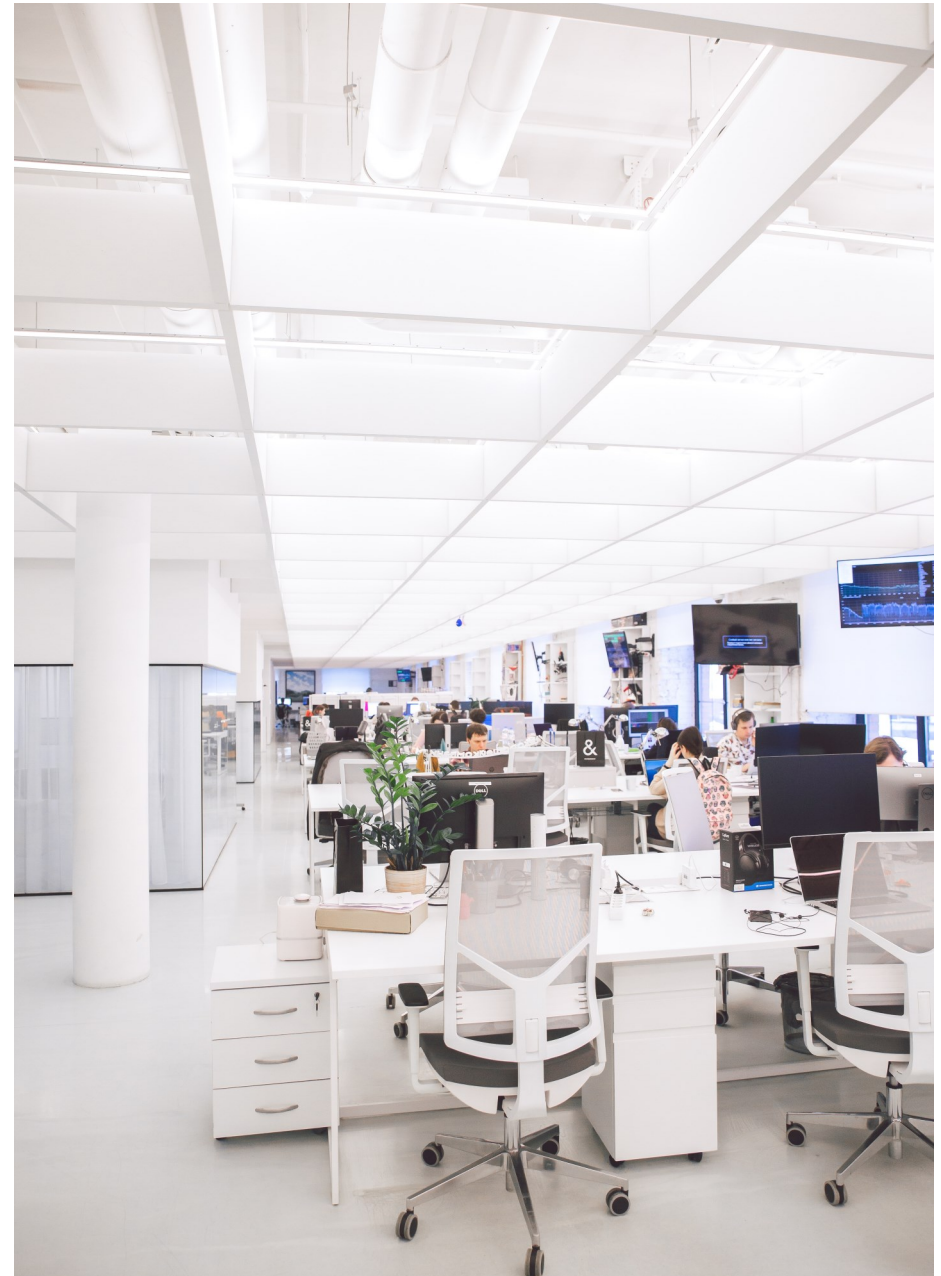
We each have an obligation to use our work time productively whether working onsite or remotely. Carestream International property must be used for business purposes only. This includes company-provided e-mail and internet access; however infrequent personal email and internet use may be permitted.

The use of work computers for other business, viewing pornography or hate-related sites, illicitly downloading music or images, or sending inappropriate e-mails is strictly prohibited. Carestream International reserves the right to monitor and search for prohibited content and misuse of Carestream International property.



Key Policies and Resources:

ICS 11— Protection of Physical and Intellectual Assets
IT Acceptable Use





Data Privacy

Carestream International is subject to many different laws that regulate our handling of Personal Information (PI). Our Global Privacy Program provides the framework for meeting our legal obligations in all of the countries where we do business. Carestream International's Global Privacy Program helps us maintain an environment where healthcare professionals and patients can trust Carestream International with their most sensitive information. We are also committed to respecting the privacy of our employees and others with whom we interact.

You are responsible for complying with all relevant data privacy laws when accessing the personal data of others. At Carestream International "privacy" means that our collection, use and disclosure of PI is appropriate and respectful. PI means any information that can be used to identify, locate or contact an individual, along with all other information that may be associated with the person.

The Global Privacy Policy provides that PI must be relevant to the purposes for which it is to be used, and appropriately accurate, complete, and kept up to date. Carestream International uses Privacy by Design methodologies to help identify and manage privacy risk. If you are not sure whether you are handling any PI or whether your use is in accordance with our Data Privacy Policy, contact the Legal Department. **In general, respect everyone's confidentiality and privacy rights!**

Examples of PI:

Email addresses	IP addresses
Medical information	Telephone numbers
Credit card information	Name and government ID number
Employee ID number	Financial Information
Date of Birth	

Key Policies and Resources:

ICS 9A— Data Classification
ICS 9B—Global Privacy





Our Communities





Charitable Contributions, Grants, Community Service and Volunteerism

To ensure compliance with applicable anti-bribery and anti-corruption laws, and to maintain sound financial controls over **Carestream International's charitable giving, all such expenditures must be made in compliance** with the Carestream International's Charitable Contributions and Educational Grants policy and procedure. If any third parties have questions about how to seek Carestream International's support for an educational event, research activity or charitable work, you should follow all Carestream International policies.

Carestream International encourages community service and volunteerism. However, you must seek the approval of Human Resources before committing to engage in such activities during working hours. Distributing non-work-related literature and soliciting for outside organizations is prohibited during work time and in work areas, unless approved by Human Resources and local management.

Additionally, while you may put through a request for Carestream International to support a local charity, your personal charitable endeavors should be undertaken without pressuring or requesting others within Carestream International or with whom we do business to support it. Requests for formal Carestream International support should follow the appropriate process.

Human Rights and Fair Labor Practices

Carestream International is committed to its obligation to ensure that its employees, vendors, suppliers, or other subcontractors do not use forced labor or engage in human trafficking. Carestream International and its third parties must comply with all applicable labor laws that safeguard worker's rights under national and international labor and social security laws and regulations governing the following areas:

- Freely Chosen Employment
- Child Labor
- Working Hours, Wages and Benefits
- Humane Treatment
- Non-Discrimination /Non-Harassment



Key Policies and Resources:

Carestream International's Charitable Contributions and Educational Grants policy
Solicitation policy
Volunteerism policy



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.

Key Policies and Resources:

ICS 13– Environmental Health Safety
Environmental, Health and Safety

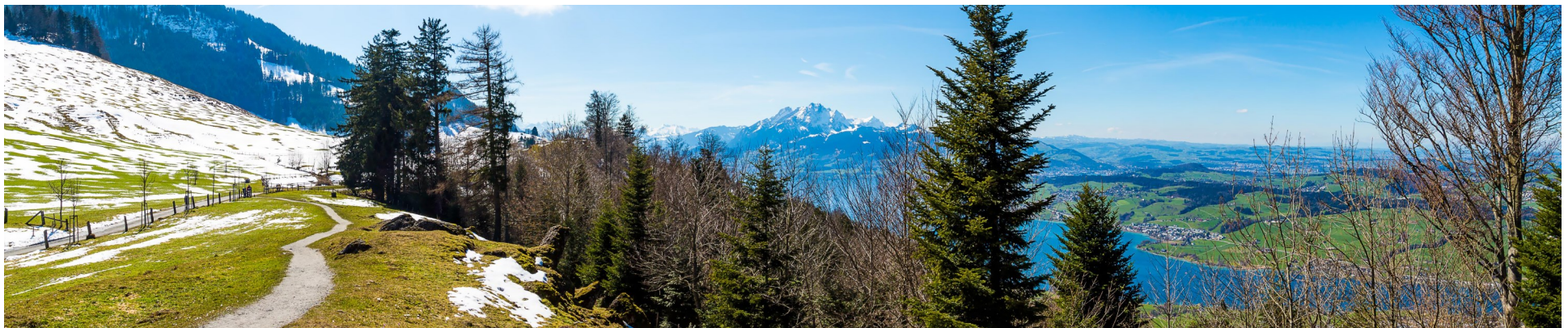


Environmental, Health & Safety

We are committed to conducting business in such a way as to preserve the environment and protect the health and safety of employees, neighbors and customers. We are all responsible for following Company policies and the Environmental, Health and Safety (EHS) laws that apply to our business to:

- Ensure compliance with both internal and external EHS global requirements.
- Identify and manage EHS risks.
- Drive continuous improvement.
- Support implementation of our Corporate EHS policies and procedures.

Employees are responsible for following Carestream International processes that ensure risk identification, monitoring and mitigation, incident management related to employee and environmental protection, EHS security-related matters, EHS business continuity, and emergency preparedness.





Thank you