

## **Annual Declaration of Compliance with California Law**

Carestream Health has adopted a comprehensive compliance program relating to relationships with health care professionals entitled Carestream Health Business Conduct Guide.

Carestream Health believes that the medical imaging industry has unique differences from the drug and pharmaceutical industry. The medical imaging industry has established a voluntary code of ethics called the Medical Imaging and Technology Alliance Code of Ethics on Interactions with Health Care Providers, under the auspices of the National Electrical Manufacturers Association, ("MITA Code").

Carestream Health has adopted the MITA Code and incorporated it into the Carestream Health Business Conduct Guide. The MITA Code is substantially equivalent to the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals (PhRMA Code), but is focused specifically on the medical imaging industry as opposed to the pharmaceutical industry.

Carestream Health's Business Conduct Guide is the foundation of our Comprehensive Compliance Program as it summarizes our core compliance policies and procedures. Other key aspects of our Comprehensive Compliance Program include:

- A compliance organization made up of a Chief Compliance Officer and Ethics and Compliance Counsel that meets regularly;
- Regular live and web based, role specific, training and education to help our employees understand their legal and ethical obligations;
- Effective and multiple avenues of communication that encourage our employees to bring compliance questions and concerns to their manager or to the Ethics and Compliance counsel;
- Internal Controls and Audits
- Prompt investigation and remediation of ethical or compliance issues;
- A Pocket Guide on Interactions with Healthcare Professionals specifically designed for sales and marketing personnel in our US medical divisions. We have also included guidance to both the US medical and US dental divisions on California's Health & Safety Code §§ 119400 – 119402 (SB 1765) and set our California annual aggregate spend limit at \$1500 for permitted gifts, promotional materials, or items and activities for individual healthcare professionals. This annual dollar limit is an upper limit and does not represent the average value of such gifts, promotional materials, or items and activities provided to an individual professional.

Carestream Health believes its Compliance Program meets the compliance goals set forth by the State of California's Health & Safety Code §§ 119400 – 119402

(SB 1765). To our knowledge, we are, in all material respects, in compliance with our Comprehensive Compliance Program, OIG Guidance, the MITA Code and applicable law.

This declaration is made only for the purpose of compliance with California Health and Safety Code section referenced above and should not be interpreted as a declaration of compliance with any other statute or regulation.

Signed,  
Patricia A. Mellon-August 10, 2010  
Acting Chief Compliance Officer  
Carestream Health Inc.

Carestream Health will provide this summary of its Compliance Program, a copy of its Business Conduct Guide and a copy of this declaration as it relates to the California Health & Safety Code 119400-119402 via fax or hardcopy upon request. To request this information please contact us at 1-877-829-2654.