



Varex Imaging Corporation Responsible Business Code of Conduct Policy

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Owner(s)

Policy Number

Date

Human Resources, Legal

20007348

Equal to date of last Approver

Section	Description
1.0	LABOR
2.0	HEALTH AND SAFETY
3.0	ENVIRONMENT
4.0	ETHICS
5.0	MANAGEMENT SYSTEMS
	SIGNATURES


Varex Imaging Corporation (“Varex”) adopts the following standards with respect to labor rights, health and safety, environmental matters, conflict minerals, ethical behavior, and related management systems. Varex’s subsidiaries and employees, as well as third parties representing Varex (collectively, “Business Partners”), including consultants, independent contractors, agents, distributors, sales representatives, joint venture or strategic partners, and suppliers, are required to adhere to these standards and will be held accountable to them. Business partners are required to adhere to both the general standards and the Business Partner-specific provisions.

1.0 LABOR

Varex is committed to upholding the human rights of workers, and to treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. Information regarding Varex’s policies and practices with respect to human rights can be found in Varex’s Human Rights Policy.

1.1. 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

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receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. There shall be no unreasonable restrictions on workers’ freedom of movement in the facility or unreasonable restrictions on entering or exiting company-provided facilities including, if applicable, workers’ dormitories or living quarters. As part of the hiring process, all workers are provided with a written offer or agreement that contains a description of the terms and conditions of employment. Foreign migrant workers must receive the documentation prior to the worker departing from his or her country of origin. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment in accordance with the provisions in their employment arrangement. Employers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time shall workers be denied access to their documents. Workers shall not be required to pay employers’ agents or sub-agents’ recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

In addition, Varex has adopted the United States Government’s policy prohibiting trafficking in persons set forth in [Federal Acquisition Regulation 52.222-50\(b\)](#), and to the extent applicable, Business Partners shall comply with the provisions of Federal Acquisition Regulation 52.222-50.

Information regarding Varex’s practices with respect to freely chosen employment can be found in Varex’s Modern Slavery Transparency Statement [Statutory Flowdowns and Policies | Varex Imaging](#).

1.2. Young Workers

Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 18, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The age of workers shall be verified. The use of legitimate workplace learning programs, which comply with applicable laws and regulations, is supported. Varex supports proper management of student workers through proper maintenance of student records, due diligence of educational partners, and protection of students’ rights in accordance with applicable laws and regulations. Varex provides appropriate support and training to student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices will be at least the same wage rate as the minimum entry rate for other workers performing equal or similar tasks. If child labor is identified, assistance/remediation would be provided.

1.3. Wages and Benefits



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Compensation paid to workers shall comply with applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. Subject to compliance with local laws, eligible workers shall be compensated for overtime at pay rates greater than regular hourly rates. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Use of temporary, dispatch, and outsourced labor will be in accordance with local law.

1.4. Working Hours and Humane Treatment

Working hours are not to exceed the maximum set by local law. There is to be no inhumane treatment of workers, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, or public shaming of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

1.5. Diversity and Non-Discrimination/Non-Harassment

Varex believes that diverse minds lead to innovation, which is one of the reasons Varex strives to build a culture of inclusion. Varex values people for their differences and welcomes those who share its passion. Varex believes it has built a workforce that champions diverse minds and fosters inclusivity.

Varex commits to a workplace free of harassment, bullying and unlawful discrimination. Parties subject to this Policy shall not engage in harassment, bullying or discrimination including those based on a legally protected class. Workers are to be provided with reasonable accommodation for religious practices in compliance with applicable law.

1.6. Freedom of Association

In compliance with applicable law, Varex respects the rights of workers to form and join trade unions of their own choosing and to bargain collectively, as well as the rights of workers to refrain from such activities. Workers and/or their collective bargaining representatives shall 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.

2.0 HEALTH AND SAFETY



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Varex 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. Varex also recognizes that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. Varex (a) acts in accordance with applicable statutory and international standards regarding occupational health and safety and provides safe working conditions; (b) provides training to educate employees regarding health and safety issues; and (c) has established an occupational health and safety management system based on ISO 45001.

3.0 ENVIRONMENT

Varex recognizes that environmental responsibility is integral to producing world-class products. Varex seeks to identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources within its manufacturing operations, while safeguarding the health and safety of the public.

3.1. 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.

3.2. 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. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3.3. Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to support their safe handling, movement, storage, use, recycling or reuse, and disposal.

3.4. Solid Waste

A systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous) shall be implemented.



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3.5. 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. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Routine monitoring of the performance of air emission control systems shall be conducted.

3.6. Materials Restrictions

Varex adheres to all applicable laws and regulations regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

3.7. Water Management

A water management program that documents, characterizes, and monitors water sources, use and discharge, seeks opportunities to conserve water, and controls channels of contamination shall be implemented. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Routine monitoring of the performance of wastewater treatment and containment systems shall be conducted to support optimal performance and regulatory compliance.


3.8. Energy Consumption and Greenhouse Gas Emissions

Varex has established, and Business Partners shall establish, a corporate-wide greenhouse gas reduction goal. Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal. Varex looks for methods to improve energy efficiency and to minimize its energy consumption and greenhouse gas emissions. **Pollution Prevention and Resource Reduction**

4.0 ETHICS

To meet social responsibilities and to achieve success in the marketplace, the following ethics standards shall be upheld. Additional information regarding Varex’s policies and practices with respect to these standards can be found in Varex’s Code of Conduct.

4.1. Business Integrity

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The highest standards of integrity are to be upheld in all business interactions. Varex has a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

4.2. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to support compliance with anti-corruption laws.

4.3. Disclosure of Information

All business dealings shall be transparently performed and accurately reflected on 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.

4.4. Intellectual Property

Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and Business Partner information is to be safeguarded.

4.5. Fair Business, Advertising, and Competition


Standards of fair business, advertising, and competition are to be upheld.

4.6. Protection of Identity and Non-Retaliation

Programs that support the confidentiality, anonymity, and protection of Business Partner and employee whistleblowers are to be maintained, unless prohibited by law. Varex has established, and Business Partners shall establish, a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

4.7. Responsible Sourcing of Minerals

Varex supports efforts to eliminate the use of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Varex is committed to complying with

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Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and to exercising due diligence on the source and chain of custody of conflict minerals in a manner consistent with the Organization for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Additional information regarding Varex’s practices with respect to conflict minerals can be found in Varex’s Conflict Minerals Policy.

4.8. Privacy

Varex is committed to high data protection standards. Maintaining employee privacy and the confidentiality of employee records and personal information is essential. Further details about how Varex does this can be found in Varex’s Code of Conduct, [Privacy Statement](#), Data Protection Policy, and Information Security Policy. In addition, with respect to new products or updates, Varex looks closely at how it uses data, assesses risks, and puts safeguards in place to address them. Varex also monitors its post-market products to identify and address any privacy risks that arise after such products are in the market.

Business Partners shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Business Partners are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.


5.0 MANAGEMENT SYSTEMS

A management system with a scope that is related to the content of this Code shall be established. The management system shall be designed to support: (a) compliance with applicable laws and regulations related to operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It shall also facilitate continual improvement. The management system shall contain the following elements:

5.1. Company Commitment

Corporate social and environmental responsibility policy statements affirming a commitment to compliance and continual improvement, endorsed by executive management, and posted in the facility in the local language.

5.2. Management Accountability and Responsibility

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The senior executive and company representative(s) responsible for implementation of the management systems and associated programs shall be clearly identified. Senior management reviews the status of the management systems on a regular basis.

5.3. Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and support regulatory compliance. Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

5.4. Improvement Objectives

Written performance objectives, targets and implementation plans to improve social, environmental, and health and safety performance, including a periodic assessment of performance in achieving those objectives.

5.5. Training

Programs for training managers and workers to implement policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.


5.6. Communication

A process for communicating clear and accurate information about policies, practices, expectations, and performance to workers, Business Partners, and customers.

5.7. Worker Feedback, Participation, and Grievance

Ongoing processes, including an effective grievance mechanism, to assess workers’ understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

Varex encourages all its stakeholders to promptly come forward with questions or concerns about possible violations of this Code. Varex maintains an online and telephone reporting Hotline that is operated by an independent provider and is accessible 24 hours a day, seven days a week. This service may be used, where

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available, for raising questions or reporting concerns. Information detailing how to access the Hotline is available on Varex’s internal and external websites and is posted at Varex locations. The manner in which reports may be made varies from country to country, and further instructions are available by calling the Hotline.

Even though in most countries reports may be made anonymously, being able to communicate with a reporter allows Varex to conduct a more thorough investigation. Reporters are therefore encouraged to agree to further communications and correspondence from Varex (which can be done through the Hotline to maintain anonymity) when reporting an incident. Reports will be treated fairly and objectively and kept in confidence to the extent it is reasonably possible to do so, given Varex’s need to thoroughly investigate the information reported and subject to duties arising from applicable laws, regulations or legal proceedings.

Varex will not permit retaliation against any person who reports, in good faith, violations of this Code. Retaliation, including any attempt to harm or slander an employee, or reports not made in good faith, may be grounds for discipline up to and including termination of employment, consistent with applicable law.

5.8. Audits and Assessments

Periodic self-evaluations that address conformity with legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

5.9. Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

5.10. Documentation and Records

Creation and maintenance of documents and records to support regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

5.11. Business Partner Responsibility

A process to communicate Code requirements to Business Partners and to monitor Business Partner compliance with the Code.



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Signatures

“The electronic signature record will be appended to the last page of the secured document.”

NAME

Victor Garcia

Kim Honeysett



Document Signing Page

This document has been reviewed and approved by the following people:

Approver: Kim Honeysett, Date: Jan 11, 2022 9:04 AM MST, Meaning: I acknowledge my electronic signature carries the same meaning as a handwritten signature

Approver: Victor Garcia, Date: Jan 12, 2022 8:02 AM MST, Meaning: I acknowledge my electronic signature carries the same meaning as a handwritten signature