



Varex Imaging Corporation
Human Rights Policy
(August 21, 2021)

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Owner(s)

Policy Number

Date

Human Resources, Legal

20005493

Equal to date of last Approver


Section	Description
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1.0 COMMITMENT TO HUMAN RIGHTS

Innovation is the heart of Varex’s vision to create a healthier, safer future. Through innovation, our goal is to collaborate with our customers to create future products that positively impact the lives of millions of people. We also believe that in order to be successful in this vision, we must do the right thing, embrace equality, innovate together, and hold ourselves accountable. Respect for human rights is a fundamental part of our core values as a company.

– Sunny Sanyal, Chief Executive Officer, Varex Imaging Corporation

At Varex Imaging Corporation (“Varex” or the “Company”), we are committed to good citizenship, which includes advancement of human rights. We express our commitment to human rights through this Policy, our [Code of Conduct](#), and other Company policies that cover privacy, information security, and other employment matters. Our suppliers and subcontractors are subject to a code of conduct and additional policies. This Policy is informed by engagement with stakeholders.

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A. INTERNATIONAL HUMAN RIGHTS LAW FRAMEWORK

Varex supports the objectives of the [United Nations Guiding Principles on Business and Human Rights](#) (“UNGPs”), the [Universal Declaration of Human Rights](#), the [International Covenant on Civil and Political Rights](#), the [International Covenant on Economic, Social, and Cultural Rights](#), and the [International Labour Organization Declaration on Fundamental Principles and Rights at Work](#), as well as the aspirations outlined in the [United Nations Sustainable Development Goals](#).

Varex recognizes the diversity of laws in the locations where we operate and where people use our products and services. We respect local laws, and when faced with conflicts between these laws and our human rights commitments, we seek to honor the principles of internationally recognized human rights to the greatest extent possible.

We implement our commitment to the human rights outlined in this Policy by using the approaches set out in the UNGPs, including: (1) applying this Policy and related policies; (2) conducting due diligence; (3) providing access to remedy; and (4) maintaining oversight and governance.

B. SCOPE


This Policy applies to all Varex employees, including management and executives, and Varex suppliers and business partners.

This Policy is effective as of August 21, 2021.

2.0 HUMAN RIGHTS AT VAREX

A. DATA 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 we do this can be found in our [Code of Conduct](#), [Privacy Statement](#), [Data Protection Policy](#), and Information Security Policy, incorporated by reference herein. We also recognize the unique risks to privacy that some of our products can pose. Therefore, for new products or updates, we look closely at how we use data, assess risks, and put safeguards in place to address them. We also monitor our products to identify and address any privacy risks that arise after they are in the market.

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B. LABOR

Our employees are at the heart of every Varex success. That is why we are committed to creating workspaces where our people feel supported to bring their best selves to work. It is also why we focus on being a good neighbor for our local communities.

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 receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. There is to 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 are 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 should 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, these 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\(b\)](#).

Information regarding Varex’s practices with respect to freely chosen employment can be found in our [Modern Slavery Transparency Statement].

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. We verify the age of workers. The use of legitimate workplace learning programs, which comply with applicable laws and



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regulations, is supported. We ensure 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. We provide 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.

3. WAGES AND BENEFITS

Compensation paid to workers will 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 are to be compensated for overtime at pay rates greater than regular hourly rates. For each pay period, workers are to 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.

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.

5. DIVERSITY AND NON-DISCRIMINATION/NON-HARASSMENT

We believe that diverse minds lead to innovation, which is one of the reasons we strive to build a culture of inclusion. We value people for their differences and welcome those who share our passion. We believe we have built a workforce that champions diverse minds and fosters inclusivity. We remain committed to the [Parity Pledge](#), showing our continued dedication to considering female candidates for all Vice President and Board-level positions.

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.

6. FREEDOM OF ASSOCIATION

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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.

C. RESPONSIBLE SOURCING OF MATERIALS

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 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 our [Conflict Minerals Policy](#).

3.0 DUE DILIGENCE


Varex conducts due diligence from time to time to verify that business is being conducted in compliance with our standards with respect to labor, privacy, ethics, and minerals sourcing.

4.0 TRAINING

All Varex employees are required to complete annual ethics training and certify that they have read and understood the provisions of our [Code of Conduct](#).

5.0 REPORTING

We encourage all our stakeholders to promptly come forward with questions or concerns about possible violations of our policies. 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 the Company’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 Policy. Retaliation, including any attempt to harm or slander another employee, or reports not made in good faith, may be grounds for discipline up to and including termination of employment, consistent with applicable law.

6.0 GOVERNANCE

This Policy has been approved by Varex’s Board of Directors and will be reviewed periodically. Our Executive Compliance and ESG Committee, composed of our Chief Executive Officer, Chief Financial Officer, General Counsel, Senior Vice President of Medical Sales and Marketing, Chief Human Resources Officer, Senior Vice President of Regulatory & Quality Compliance, and one business leader from Europe, reviews our human rights risks periodically and as needed. Human rights risks are reported to the Board periodically with other environmental, social, and governance related risks.

Signatures	“The electronic signature record will be appended to the last page of the secured document.”
NAME	
Sunny Sanyal	
Victor Garcia	
Stephanie Reid	
Chad Holman	



Document Signing Page

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

Approver: Sunny Sanyal, Date: Dec 16, 2021 6:53 AM MST, Meaning: I acknowledge my electronic signature carries the same meaning as a handwritten signature

Approver: Stephanie Reid, Date: Dec 16, 2021 7:51 AM MST, Meaning: I acknowledge my electronic signature carries the same meaning as a handwritten signature

Approver: Victor Garcia, Date: Dec 16, 2021 9:47 AM MST, Meaning: I acknowledge my electronic signature carries the same meaning as a handwritten signature

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