

## **Varex Imaging Corporation**

### **Code of Conduct**

Varex is dedicated to developing innovative X-ray imaging technologies for medical, industrial, and security applications to detect, diagnose, and protect. In fulfilling our company mission, we want to make the world a healthier, safer place and hold ourselves to a high standard. Varex places top priority on ethical business practices. In all our efforts, we seek to do well by doing the right thing. This means that all of us must act ethically, responsibly, and respectfully in compliance with applicable laws wherever we operate.

Our commitment to ethical behavior starts at the top and extends to all our employees, business partners, and stakeholders. Varex takes ethical behavior very seriously, and our EPIC corporate values drive our actions. We developed this Code of Conduct to provide you with guidance for daily business activity where questions could arise. The Code of Conduct guidance may state that certain conduct is acceptable or unacceptable, or may provide safeguards that assist with avoiding the appearance of impropriety or misconduct. Where you have questions, we encourage you to inquire and seek further guidance. Failure to comply may result in disciplinary action, including termination. Ultimately, our success depends not only on compliance with this Code of Conduct and our corporate policies, but also on the honesty, fairness, integrity, good common sense, and discretion brought to the job by all of us.

Compliance is owned by all Varex employees. Our reputation as a company of the highest integrity means everything. We are convinced that our commitment to ethical compliance is not just a “defensive” measure. Rather, it is a commitment we all make that provides us with a competitive advantage that will allow us to grow and to succeed as a company. And besides, it's the right thing to do!

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**Note:** References to the “Company” or “Varex” mean Varex Imaging Corporation and its subsidiaries and controlled entities worldwide. References to the “Board” mean Varex’s Board of Directors.

***If you have any questions about any aspect of this Code of Conduct,  
please contact the Varex Legal Department.***

## **INTRODUCTION - DO WHAT'S RIGHT**

***Who must follow the Code of Conduct?***

***Knowing and doing what's right***

***What each of us should do***

***How to seek advice and raise concerns***

***Violations and retaliation***

### ***Who must follow the Code of Conduct?***

This Code of Conduct governs our business decisions and actions regardless of where we are located. Ensuring that Varex does the right thing is the responsibility of all of us, including:

- Varex Board members, officers, and all other employees.
- Varex subsidiaries and controlled affiliates (entities in which Varex owns more than 51.5 percent of the voting rights or has the right to control the entity).

Each of these groups is responsible for complying with the Code of Conduct, Varex policies, and the law, and to take applicable training where assigned.

### ***Knowing and doing what's right***

This Code of Conduct attempts to address the most common legal and ethical issues you may encounter; however, it's impossible to address every business situation in one document. When deciding whether an action is ethical and in compliance with this Code of Conduct, ask yourself the following questions:

- Does my action align with our EPIC Core Values?
- Do I feel like I'm doing what's right?
- Is it consistent with the way I would want to be treated?
- How would it look if my decision is published in the newspaper?
- Is it legal?

If you have any questions or are unsure about the proper course of action, please do not hesitate to reach out to your local Human Resources ("HR") or Legal Department representative, or a designated compliance officer. Please remember that retaliation against any person who raises good faith concerns or reports, in good faith, violations of law, regulations, the Code of Conduct, or Company policies is prohibited.

Please also note that the Company has policies that cover a number of the topics included in this Code of Conduct. Please be sure to refer to and comply with Company policies.

### ***What each of us should do***

Each of us should understand and comply with our obligations under this Code of Conduct, and to be proactive when it comes to compliance.

- Regularly revisit your knowledge and understanding of Varex's ethical and legal standards as stated in this Code of Conduct and in company policies. If you are

located outside of the United States, please take time to understand country-specific variances applicable to you, as they may exceed the guidelines and requirements stated in this Code of Conduct. Check Varex's intranet or ask your local HR, Legal Department or compliance representative for more information.

- Attend applicable compliance training sessions and complete online training in a timely manner.
- Uphold the ethical standards of the Code of Conduct, and follow the policies, procedures, and practices that support them, through your daily business conduct.
- Be alert to any actions that are illegal or are in violation of the Code of Conduct or other Company policies and procedures.
- Promptly report potential violations (see "*How to seek advice and raise concerns*" below). Do not attempt to investigate matters yourself.
- Contribute to a workplace environment that is conducive to maintaining the highest legal and ethical standards in daily business activities.
- Never put short-term goals above Varex's commitment to compliance and ethics.

If you are a manager or an officer, in addition to the employee expectations, you should:

- Set an example with words and actions. Encourage ethical conduct by personally leading compliance efforts.
- Create a culture in which employees understand their ethical responsibilities and raise good faith concerns without fear of retaliation.
- Serve as the first point of contact when team members have questions and concerns, and provide clear guidance. If you do not know the answer or are unsure, let the team member know you'll get back to them and then refer the question or concern to the appropriate department.
- Facilitate employee attendance and timely completion of compliance training.
- Refer all unethical behavior and illegal conduct to your local HR or Legal Department representative, or designated compliance officer whether you witness the misconduct or receive a report about it. Fully cooperate with Company investigations and allow your employees to do.
- Consider compliance efforts when evaluating and rewarding employees.
- Ensure employees understand that business results are never more important than ethical conduct.

### ***How to seek advice and raise concerns***

We encourage all our stakeholders to promptly come forward with questions or concerns about possible violations of laws, the Code of Conduct, ethical business standards, accounting and auditing standards, or Company policies. Investigating all reports of possible non-compliance or unethical behavior—including reports that prove to be incorrect—helps Varex maintain the integrity of the ethical compliance program. In addition, if you have questions about your responsibilities under the Code of Conduct, Company policies, or the requirements of applicable laws or regulations, please seek guidance from your local HR or Legal Department representative, or designated compliance officer.

Varex maintains an online and telephone reporting Hotline that is operated by an independent provider and is accessible 24 hours a day, 7 days a week. You may use

this service, where 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 you may call the Hotline for further instructions.

Even though in most countries you may report anonymously, being able to communicate with a reporter allows us to conduct a more thorough investigation. You 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.

**IMPORTANT:** *For individuals in certain countries, the Hotline only allows you to report accounting or auditing concerns through this system, due to local law. If you wish to report problems in the workplace, contact your local HR or Legal Department representative, or designated compliance officer.*

#### **Violations and non-retaliation**

**Violations of this Code of Conduct will be treated seriously, and may be grounds for disciplinary action, including warnings or termination of employment in accordance with applicable law. Compliance violations may result in, among other things, fines and/or imprisonment for individuals, and fines, penalties, third party damages and loss of reputation for the Company.**

**Varex will not permit retaliation against any person who reports, in good faith, violations of law, regulations, the Code of Conduct, or Company policies. 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.**

## **MARKETPLACE**

***Applicable laws and potential conflicts***

***Product safety and quality***

***Relationships with health care professionals***

***Business courtesies***

***Bribery and other corrupt payments***

***Fair dealing and complying with competition laws***

***Trade compliance***

***Working with third parties***

***Money laundering prevention***

### ***Applicable laws and potential conflicts***

Varex employees are located around the world and are citizens of many different countries. As a result, our operations are subject to the laws of many countries, provinces, states, municipalities, and organizations. Failure to comply with any applicable laws can result in serious civil and even criminal liability and damage to our assets and reputation.

Sometimes, there may be a conflict between the laws of different countries, or between applicable law and the Code of Conduct. When you encounter a conflict, it is especially important to consult the Varex Legal Department to understand how to resolve the conflict properly and avoid creating potential risk for the Company and our employees.

Your business unit or department may issue its own policies, procedures and guidelines. You must follow those policies, procedures and guidelines in addition to those described in the Code of Conduct. If there is a conflict between business policies, procedures and guidelines and the Code of Conduct, and any legal requirements, you should apply the most stringent standard. If you see such a conflict, please bring them to the attention of the Varex Legal Department.

### ***Product safety and quality***

Safety is paramount in all of the products and services Varex provides. It is Varex's responsibility to manufacture and commercialize its products to meet legal and regulatory requirements governing the design, manufacture, and supply of products that make a positive difference in the markets they serve. To that end, we provide regular training on quality and regulatory requirements, and expect employees to follow policies and procedures regarding complaint and safety incidents. Please contact the Varex Regulatory and Quality Assurance Department if you have questions.

### ***Relationships with health care professionals***

A health care professional is an individual or entity that is involved in the provision of health care services to patients; and that influences, purchases, leases, recommends, uses, arranges for the purchase or lease of, or prescribes a company's products and services. Examples of health care professionals are doctors, nurses, and hospital staff.

Developing honest, constructive relationships with health care professionals is essential to understanding the needs of the health care community. These relationships are subject to strict regulations (which vary from country to country), of which all Varex employees and agents should be aware and comply.

Varex and its employees must be particularly diligent to ensure they comply with applicable laws while engaging or interacting with HCPs. Interactions with HCPs should focus on engaging them to provide bona fide services at approved fair market value rates, informing them about Varex products, and providing scientific and educational information, and supporting medical research and education. All interactions with HCPs must follow Varex procedures, and any payments or other consideration provided to HCPs must be analyzed for potential transparency reporting. In certain countries and U.S. states, Varex is required to report all payments and transfers of value (e.g., gifts, meals) provided to health care professionals, and may even be prohibited from providing such items, even if small in value. If you expect or intend to interact with an HCP, please reach out to the legal department at [legal@vareximaging.com](mailto:legal@vareximaging.com) prior to any such interaction for more detailed guidance.

Please review our corporate policies on working with healthcare professionals for more information.

### ***Business courtesies***

Offering or accepting business courtesies (e.g., gifts, gratuities, donations, meals, and other forms of entertainment) may or may not be acceptable, depending on who is offering or accepting the courtesy, where the offer occurs, and why the offer is being made. Business courtesies offered to government officials or health care professionals are particularly sensitive, as they may violate anti-bribery or anti-corruption laws or industry standards of practice. All offers and acceptances of business courtesies must be made in accordance with the applicable laws and must avoid any appearance of dishonesty or inappropriateness. You may not provide or accept a business courtesy if it could be understood as an attempt to influence an official or other business professional for your personal benefit or for the benefit of the Company or any of its subsidiaries. Please review our corporate ethical compliance policies for more information and contact the Varex Legal Department to determine whether offering or accepting a particular business courtesy would be acceptable.

### ***Bribery and other corrupt payments***

Bribery is defined as offering, giving or receiving something of value to improperly influence the person's views or conduct. In the business world, bribery can be used to improperly influence judgment or actions, affect a decision, gain (or retain) customers, or obtain an unfair advantage. Bribery and other corrupt payments are prohibited by law throughout the world. Varex is fully committed to the principles and practices of anti-bribery and anti-corruption laws.

Bribes can take the form of cash, gifts, entertainment, contributions, certain discounts or rebates, or anything else of value. A bribe is illegal whether it is made directly or through an intermediary. In some countries a small bribe, sometimes called a 'facilitating' or 'grease' payment, is a part of the local culture. Varex employees, and all parties acting on its behalf, are not allowed under any circumstances to give or offer

any such payments or engage in any conduct that could be perceived as giving or offering a bribe. Please review our corporate ethical compliance policies for more information.

***Fair dealing and complying with competition laws***

Fair dealing means that no unfair advantage is taken through manipulation, concealment, misrepresentation of material facts, abuse of confidential or privileged information, or similar practices. Varex competes vigorously, fairly and solely on the merits of our products and services. Our actions and relationships, including those with our customers, suppliers, competitors and employees, must be based on fair dealing, fair competition in quality, price, and service, and compliance with applicable laws and regulations.

Our business activities are subject to, and we must comply with, competition laws (also referred to as “antitrust” laws) wherever we do business. These laws are intended to ensure fair and honest competition. Generally, these laws prohibit conspiracies between competitors, improper attempts to monopolize markets and to fix or control prices, and other unfair business practices. These laws apply to many aspects of our business, including sales, marketing, procurement, contracting, and mergers and acquisitions, and are very broad and complex. Care should be given to understand how they impact your everyday activities, so please seek guidance if needed.

***Trade compliance***

The growth and success of Varex's global business depends on our continued ability to conduct trade across borders with ease. Many countries regulate international trade transactions, such as imports, exports and international financial transactions, for a variety of reasons, including national security and foreign policy. Varex is committed to complying with applicable export and import laws and regulations in the countries where it does business. When conducting business across borders, please be aware of and follow applicable laws, as well as Varex's global trade compliance policy and procedures.

Global sanctions programs restrict or prohibit Varex's business in or with certain countries, businesses, and persons as well as restrict certain types of end uses of Varex products that support nuclear proliferation, missile technology, and chemical and biological weapons. As these laws are complex and frequently change, employees should always contact the Trade Compliance Department for guidance on any proposed business activity related to sanctioned countries or with a restricted party or end use.

***Working with third parties***

In many instances Varex engages individuals or companies that provide products and services on Varex's behalf. The actions and activities of these third parties can be attributed to Varex. Varex performs due diligence on these third parties and requires the third party to take appropriate training prior to retaining them.



### ***Money laundering prevention***

Money laundering is the act of concealing the sources of money to avoid disclosing its sources, uses, or paying taxes. Varex is committed to compliance with anti-money laundering and anti-terrorism laws throughout the world. We will conduct business only with reputable customers involved in legitimate business activities using funds derived from legitimate sources. Employees should avoid engaging in any transaction that is structured in a way that could be viewed as concealing illegal conduct or the tainted nature of the proceeds or assets at issue in the transaction. Failing to detect customer relationships and transactions that place Varex at risk can severely damage our integrity and reputation.

### **FELLOW EMPLOYEES**

***Workplace and mutual respect***

***Human rights***

***Harassment and bullying***

***Fair employment***

***Health and safety***

***Employee and customer data privacy***

### ***Workplace and mutual respect***

At Varex, we consider our employees to be our greatest strength. When employees are valued and treated as team members, they are motivated to contribute to the working environment in a constructive and effective manner, to the mutual benefit of all. We each play a role in creating and maintaining this type of environment. The workplace at Varex should be free from harassment, discrimination, intimidation, bullying, and retaliation. Discrimination based on a protected class will not be tolerated.

Varex is proud to be a global company with employees, business partners, and other stakeholders who are diverse. We encourage an appreciation and respect for the unique backgrounds, experiences, thoughts and talents of our employees and business partners. Understanding, respecting, and valuing inclusion, diversity, and equity is central to our EPIC Core Values. We expect others to be treated with respect and consideration for different values, beliefs and cultures. We value input from others who may have a different perspective and encourage an environment of trust and openness.

### ***Human rights***

In addition, we are committed to good citizenship, which includes the protection and advancement of internationally recognized human rights. Please refer to our Human Rights Policy for additional information regarding our human rights policies and practices.

### ***Harassment and bullying***

Varex does not tolerate harassment, bullying or intimidation in any form, whether verbal, non-verbal, or physical. Varex employees must at all times comply with Varex policy, applicable laws, employ common sense, and exhibit respect for others. It's

important to remember that harassment, sexual or otherwise, is determined by each of our actions and by how they are perceived by others, regardless of our intentions. If you feel someone is harassing you, bullying you or is interfering with your ability to perform your job, you have the right to ask the person to stop, and tell him/her—in a clear, professional manner—that the behavior is unwelcome. You may also report such behavior or concern to your local HR or Legal Department representative, or designated compliance officer, or consult the Hotline for alternatives for reporting in your country. Retaliation is prohibited when you act in good faith to report an incident of harassment, bullying or intimidation.

### ***Fair employment***

Varex is firmly committed to providing equal employment opportunities to current and prospective employees. The Company bases employment decisions on job qualifications and merit, which include an individual's skills, performance and leadership, and we respect and comply with local and national laws in the locations where our employees work around the world. Whenever possible, Varex makes reasonable accommodations for disabled individuals.

### ***Health and safety***

Varex is committed to complying with health and safety laws and preventing injury wherever possible. You are responsible for creating and maintaining a safe working environment that minimizes workplace injuries and protects the health and safety of Varex's employees, business partners, and visitors. To ensure workplace safety, Varex does not tolerate the use of drugs or alcohol in the workplace. You must obey legal, regulatory, and Company requirements prohibiting the use of illegal substances.

### ***Employee and customer data privacy***

Varex is committed to the highest standards of protection of data belonging to our employees and our customers. Maintaining employee privacy and the confidentiality of employee records and personal information is essential. Access to employee records is limited to individuals with authorization for valid, legal, business-related reasons, and any information obtained from employee records may be used only under that authorization. Employees who have access to, or work with, the personal information of Varex colleagues have a responsibility to handle that information appropriately and to take all reasonable precautions to preserve its confidentiality. Employees have access to their own records according to local laws.

Varex complies with applicable laws in the treatment of employee and customer data in accordance with Varex's privacy policies.

## **COMMUNITY AND ENVIRONMENT**

### ***Political contributions***

### ***Environmental sustainability***

### ***Communicating on behalf of the Company***

### ***Social media***

#### ***Political contributions***

Varex must adhere to strict laws governing corporate political activities, lobbying and contributions that vary around the globe. For this reason, we have authorized a limited number of individuals to engage in efforts to discuss legislation or government policy with political officials. Therefore, when you personally participate in the political process, you may only do so using your own money, time and resources. Only a limited number of authorized employees may contact a government official on behalf of Varex for political purposes.

***Environmental sustainability*** We strive to embed sustainability in our operations and expect our employees to manage our operations in an environmentally responsible manner consistent with our values. Please refer to our Environmental Policy for additional information regarding our environmental sustainability policies and practices.

#### ***Communicating on behalf of the Company***

As a U.S.-based publicly traded company, Varex must provide clear and accurate information to the media, financial analysts, investors and the public. This helps us maintain integrity in our relationships with our business partners and other investors, which in turn strengthens our corporate reputation.

Only those officially designated by Varex are permitted to communicate or participate in media interviews, events or forums on its behalf. If you are contacted by an investor or member of the media, please refer them to Investor Relations or our Marketing team, as appropriate. When in doubt about any communication, contact Investor Relations or the Legal Department.

#### ***Social media***

Varex recognizes the importance of communicating with business partners and consumers through a variety of social media tools, however, if not used responsibly it presents a confidential and reputational issue for us and yourself. We encourage you to be responsible when using social media.

When posting to social media for business purposes, focus on creating value for our investors and customers. Only post accurate, public information and never post confidential information, and avoid making claims about our products unless they have been approved by management. Please do not claim to be speaking on behalf of the Company.

If you are posting to your personal social media account, please keep in mind your online communications can have a direct impact on the workplace even when they occur outside of working hours. Remember your online communications may be referenced forever and can affect both your and the Company's reputation.

## **COMPANY ASSETS AND INFORMATION**

***Conflicts of interest***

***Confidential information***

***Insider trading and stock tipping***

***Intellectual property***

***Disclosure of trade secrets***

***Protection and proper use of Company assets; Corporate opportunities***

***Recordkeeping and public reporting***

***Use of Company networks and communication systems***

### ***Conflicts of interest***

Each of us has a duty to work in Varex's best interest and to use good judgment to avoid situations that present an actual or potential conflict with Varex interests. For Varex Board members or employees, this may include recusal from discussions when participation could be perceived as creating such a conflict.

A conflict of interest occurs when private interests (or the interests of a family member) interfere, or even appear to interfere, with the interests of Varex. A conflict of interest can arise from taking actions or having interests that may make it difficult to perform work for Varex objectively and effectively. Conflicts of interest also arise from receiving improper personal benefits as a result of your role with Varex.

While we cannot list them all in this Code of Conduct, some examples of situations that may present a conflict of interest include: use of company assets for personal gain; having a financial interest in a contract where Varex is a party; having a financial or other business interest in a Varex customer, supplier, or competitor; having a relationship with a potential employee or decision-maker at a Varex customer, supplier, or competitor, or other actions that make it difficult to perform your responsibilities for Varex. Even the appearance of a conflict of interest should be avoided. Loans by Varex to, or guarantees by Varex of obligations of, employees or their family members are of special concern and could constitute improper personal benefits to the recipients of these loans or guarantees, depending on the facts and circumstances. Loans by Varex to, or guarantees by Varex of obligations of, any Varex Board member or officer are expressly prohibited.

If you believe a potential or actual conflict of interest exists, please promptly discuss the situation with your manager or your local HR or Legal Department representative or designated compliance officer.

Any transaction involving Varex employees that may implicate a conflict of interest must be approved in advance by the employee's manager and the Company's General Counsel or Associate General Counsel.

Any transaction involving Varex Board members and officers that may implicate a conflict of interest must be referred to the Company's General Counsel. After reviewing, the General Counsel will either approve or, as appropriate, escalate to the Nominating and Corporate Governance Committee for consideration and approval.

All related party transactions, whether or not deemed to be a conflict of interest, must be approved in accordance with our Related Party Transactions Policy.

### ***Confidential information***

Confidential information about Varex, including trade secrets and business, financial, technical, proprietary, and personnel information, whether written, oral or electronic, is important Varex property. Intentional or inadvertent disclosure of confidential information could seriously harm Varex's financial performance and competitive position and could compromise our rights to intellectual property, trade secrets, or proprietary information. Confidential information should always be labeled as Confidential and Proprietary Information of Varex Imaging Corporation. Each of us is responsible for protecting against the unauthorized disclosure or use of Varex confidential information, and Varex confidential information should not be used for your own benefit or for the benefit of a competitor or unauthorized third party. Please be aware that others may be able to become aware of confidential information when you access or discuss confidential information in a public place.

In addition, you may have access to confidential information of third parties, including former employers or Varex business partners such as agents, consultants, customers, suppliers, distributors, sales representatives, independent contractors, and joint venture or strategic partners. This information may have been obtained through a confidentiality agreement or otherwise. You have a duty to protect this information and not use or disclose it improperly.

### ***Insider trading and stock tipping***

Using material, non-public ("inside") information for your own financial or other personal benefit, or sharing this information with others, may violate both civil and criminal law. Inside information is news about a company not known to the investing public. Inside information is "material" if it could reasonably be expected to alter the total mix of information available about a company or affect the price of a company's stock. Common examples include projections or changes in estimates of future earnings, a proposed merger or acquisition or sale of substantial assets, stock offerings or repurchases, and significant expansion or curtailment of operations.

If you are aware of material inside information about a company, you are prohibited from directly or indirectly trading stock in that company (known as "insider trading") and must refrain from disclosing the information to others or recommending that anyone else trade stock in that company (known as "stock tipping"). The information may be about Varex or about other companies where the information about other companies is known to an individual through their relationship with Varex. The restriction against insider trading and stock tipping also applies to your family members and others living in the same household, as well as to accounts that are controlled by or subject to the influence of these persons.

### ***Intellectual property***

Intellectual property, including trade secrets, is one of Varex's most valuable assets. All of us must work to safeguard our patents, trademarks, copyrights, trade secrets, and

other proprietary information. At the same time, it is critical that we respect the valid intellectual property rights of others. We should always respect intellectual property and trade secrets that belong to our business partners and comply with the terms of any agreements relating to our business relationships.

***Protection and proper use of Company assets; Corporate opportunities***

Each of us is required to protect the Company's assets, both tangible and intangible, against loss, theft, misuse and improper disclosure, and ensure efficient use of such assets. Misuse of the Company's assets has a direct impact on Varex's profitability. Company assets should be used only for legitimate business purposes, though incidental personal use of certain assets may be appropriate as allowed by Company policy and as determined with your supervisor.

Each of us is prohibited from taking (or directing to a third party) a business opportunity that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and turned it down. More generally, each of us is prohibited from using corporate property, information or position for personal gain and from competing with the Company. We owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

***Recordkeeping and public reporting***

Varex makes business decisions based on information maintained at every level of the Company. Incomplete or inaccurate information can lead to serious legal and financial consequences.

Varex is legally required by many government agencies, including the U.S. Securities and Exchange Commission, U.S. Food and Drug Administration, and European Commission, to file timely, complete, accurate, and understandable reports and tax returns with the proper authorities and to maintain, in reasonable detail, books and records that accurately reflect Varex's activities. At times, we may be called upon to provide information to help Varex meet these reporting and filing requirements. The Company expects that all of us take this responsibility seriously and record and report information timely, fully, accurately, fairly and honestly. No employee may enter, or cause to be entered, information in the Company's books or records that intentionally misleads, misrepresents, omits, or disguises the true nature of any transaction or result. In addition, Varex transactions, assessments, and forecasts must be recorded and reported as necessary to maintain accountability for assets and to enable preparation of financial statements according to generally accepted accounting principles.

***Use of company networks and communication systems***

Varex provides the use of communication tools, such as email, computers, data files, telephones, voicemail, photocopies, trademarks and logos for work-related purposes to improve the efficiency and effectiveness of our employees' work and communication. Employees are required to use these tools in a professional, ethical, and lawful manner and to exercise good judgment and discretion as outlined in Company policies.

You should not conduct any significant personal business on Company premises, on Company time, or using Company communications tools. In some countries, data and communications may be considered the property of Varex and Varex may access data if required by law or needed for business reasons. Varex locations outside the United States may have more restrictive policies or even prohibit use of Company systems for personal use. These locations will have their own rules regarding inspection and monitoring of emails and other electronic communications, based upon local laws, and employees should be sure to consult local policies where applicable.

### **AMENDMENTS, MODIFICATIONS, AND WAIVERS**

This Code of Conduct may be amended or modified from time to time by the Company's Board or a committee of the Board, subject to the disclosure and other provisions of the Securities Exchange Act of 1934, as amended, and the rules thereunder (the "'34 Act"), and the applicable rules of the NASDAQ Stock Market (the "NASDAQ Rules"). Any amendment, modification or waiver of the provisions of the Code of Conduct for the Company's executive officers or Board members may only be made by the Board or a committee of the Board and must promptly be disclosed to stockholders as required by the '34 Act and NASDAQ Rules.