



Global Anti-Corruption Policy

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Owner(s)

Policy Number

Date

Legal

20005952

Equal to date of last Approver

Section	Description
1.0	PURPOSE
2.0	SCOPE
3.0	DEFINITIONS
4.0	POLICY
5.0	REPORTING, MONITORING AND ENFORCEMENT
6.0	EXCEPTIONS
7.0	RELATED DOCUMENTS AND APPENDICES
	SIGNATURES

1.0 Purpose

This Global Anti-Corruption Policy (the “Policy”) establishes anti-corruption standards and principles to help Varex Imaging Corporation (“Varex” or “we,” “us,” or “our”) comply with global anti-corruption laws and regulations. It explains what the applicable rules are so that we can ensure that we are acting ethically in how we do business. For any questions on this policy, or for help and advice on specific situations that you encounter, please reach out to the Varex Legal and Compliance team through the email legal@vareximaging.com.

2.0 Scope

This Policy applies to all employees and directors (collectively, “Employees”) of Varex and its subsidiaries, as well as third parties, including controlled affiliates and controlled joint ventures, working on our behalf worldwide (“Third Party Intermediaries” or “TPIs”). All persons subject to this Policy are expected to understand their responsibilities and comply with applicable laws and this Policy.



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3.0 Definitions

Anything of Value or Items of Value	<p>Includes, but is not limited to:</p> <ul style="list-style-type: none"> • Cash (or cash equivalents such as gift cards) • Gifts • Entertainment • Hospitality and Meals • Offers of employment • Personal favors (e.g. provide an internship, paid or unpaid, to a family member) • Discounts not approved in Varex’s pricing policies (e.g. discount on oncology services or equipment for a particular customer for the purpose of securing future business) • Offers to pay a debt, actual payment of a debt, or forgiveness of a debt • Gift or sale of stock or other investment opportunities • Medical, educational, or living expense • Contracts or other business opportunities awarded to a company inappropriately engaged or associated with a Government Official • Loans, including loans of real property, vacation homes, vehicles, and similar items.
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Bribe	A direct or indirect offer, provision, or promise of Anything of Value or the offer or receipt of a kickback or fee given to a Government Official or any person or entity where the purpose is to improperly influence the person to take (or refrain from taking) action that would give an improper or unfair advantage to Varex.
Government Official	<ul style="list-style-type: none"> • Any officer or employee of a government, or any department, agency, or instrumentality of a government • Any individual working for a government-controlled hospital or clinic • Any officer or employee of government-owned entities or companies • Any officer or employee of a “public international organization” (such as the United Nations, World Bank, or International Monetary Fund) • Any person acting for, or on behalf of, a government, a government entity, or a public international organization • Any political party or party official • Any candidate for political office • Consultants who hold government positions • Spouses, immediate family members, and other relatives of any of the foregoing • Any Health Care Professional employed or acting on behalf of a health care entity, owned or controlled by a government body, such as public hospitals or state universities.
Health Care Professional (HCP)	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 or services. Examples of Health Care Professionals are doctors, nurses, hospital and medical office staff, and others who have contact with patients.

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4.0 Policy

Varex will engage in ethical business practices and socially responsible conduct. Varex is committed to conducting its operations around the globe in an ethical manner and in compliance with all applicable anti-corruption laws. As part of this commitment, it is Varex’s fundamental policy to:

- Not use any unlawful inducement in order to sell, recommend, refer or arrange for the sale, lease, use or prescription of, any Varex product or service.
- Prohibit the offering, giving or receiving of payments or Anything of Value for the purpose of improperly obtaining a business or commercial advantage or which are intended to affect any governmental act or decision.

In furtherance of this general policy, Varex and its Employees and TPIs:

- Will not directly or indirectly offer, promise, authorize, pay or accept Bribes.
- Will not offer or agree to make illegal payments to government officials or others with whom we do business.
- Will not directly or indirectly offer, promise, authorize, or provide Anything of Value to Government Officials or companies with whom we do business in order to obtain an improper or unfair advantage.
- Will engage and pay TPIs only for legitimate services and will ensure that those TPIs are vetted, understand and agree to our anti-corruption standards, and are monitored for ongoing compliance with those standards.
- Will keep accurate and complete books and records of our business dealings.
- Will not help or authorize anyone to violate the requirements in this Policy.
- Will avoid any situation and not take any actions that could or potentially may create the appearance of undue influence.
- Must not use personal funds to accomplish what is otherwise prohibited by this Policy.

4.1 Bribes

Varex or any TPIs acting on behalf of Varex may NOT directly or indirectly offer, promise, authorize, accept or pay Bribes and should avoid any situation that could create the appearance of undue influence. This prohibition also applies to providing Items of Value to family members, close associates or favored organizations of the person whom you are hoping to influence to take (or refrain from taking) action to benefit Varex.



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4.2 Gifts, Entertainment, Hospitality and Contributions

Sometimes, Varex or TPIs may want to give a gift or provide entertainment, meals, or hospitality to someone without the intent to unduly influence that person. Varex, its Employees and TPIs must be very careful in this situation because we do not want to create the appearance of undue influence or violate local anti-corruption laws.

The Varex Legal and Compliance team has provided some guidelines for these kinds of activities for customers and Government Officials in the chart attached as Appendix A to this Policy.

Note: Contact the Legal Department for additional guidance *prior to* engaging in political or charitable contributions or sponsorship activity.

4.3 HCPs

Varex's technologies are subject to ongoing Research, development, and improvements that, at times may require education, training, consultation, and other interactions with HCPs. Varex and its Employees and TPIs must be particularly diligent to ensure they comply with applicable anti-kickback and anti-fraud 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 accurately recorded and analyzed for potential transparency reporting.

If you expect or intend to interact with an HCP, please reach out to the legal department at legal@vareximaging.com prior to any such interaction for more detailed guidance.

4.4 Facilitation Payments

Facilitation payments, which are small, unofficial payments to Government Officials to expedite the performance of routine, non-discretionary and ministerial government actions, are prohibited under this Policy.

4.5 Receipt or Acceptance of Business Courtesies

Varex employees may accept a business courtesy, directly or through a third party, IF AND ONLY IF the courtesy meets all of the following criteria:

- It has a legitimate business purpose and is not intended to exert improper influence or the expectation of reciprocity;
- It does not violate any laws, regulations, or other Varex policies;
- It is not in the form of cash or a cash equivalent (e.g., gift cards);
 - Notwithstanding the foregoing, gift cards provided at a professional conference or part of a broad-based client appreciation event not targeted at Varex may be accepted if they are:



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- A reasonable amount; and
- Available to all participants;
- It could not be perceived as or appear to be a bribe or other corrupt payment;
- It is appropriate in terms of value, time and place, and frequency; and
- It does not create a conflict of interest.

4.6 Maintaining Accurate Books and Records

Varex is required to keep books, records, and accounts in reasonable detail that accurately and fairly reflect all transactions and dispositions of assets. Compliance with all standards, principles, laws, and Varex practices for accounting and financial reporting is required. All payments and other transactions covered under this Policy must be accurately reported.

Varex must **not** misrepresent in its books and records any entries, including but not limited to, payments, gifts, meals, travel, or other Items of Value that were provided to third parties. If a Varex employee or representative is aware of or suspects that anyone is directly or indirectly falsifying the books and records or in any other way attempting to disguise a payment, they must report such concerns immediately (See section 5.1).

4.7 Third Party Intermediary (TPI)

Payments that Varex is prohibited from making under this Policy cannot be made indirectly on Varex's behalf by any third party. The actions and activities of a TPI can be attributed to Varex when the TPI is retained by Varex or acts on behalf of Varex. Varex is required to: (a) conduct risk-based due diligence before retaining a TPI; and (b) periodically monitor TPI activities. All engagements of TPIs must comply with the Varex TPI due diligence process. Should any Varex Employee become aware of any unethical or concerning behavior regarding a current or prospective TPI, the Employee should immediately report that behavior to the legal department or the ethical compliance hotline (See section 5.1).

5.0 Reporting, Monitoring and Enforcement

5.1 Reporting Compliance Concerns: Employees who have Corruption compliance concerns are encouraged to submit those concerns according to the Varex hotline (<https://vareximaging.sharepoint.com/sites/vici/Dept/Legal/Pages/Report-Ethical-Concerns.aspx>).

5.2 Monitoring: Varex will conduct periodic risk assessments, periodic transaction reviews, as well as audits to confirm compliance with this Policy.

5.3 Enforcement: Consequences related to compliance violations should be communicated to Varex employees through the Varex Code of Conduct, training, education, and other avenues. When a confirmed compliance violation is determined, the Legal and Compliance Department will work with relevant management to ensure that fair,



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consistent, and appropriate remedial measures, which may include progressive disciplinary actions (up to and including termination) are implemented.

6.0 Exceptions

- 6.1** Any planned deviation from this Policy or related procedure(s) must be approved in writing by the Legal Department before engaging in the activity.
- 6.2** In case the rules set forth in this Policy conflict with applicable national or local requirements, the most stringent requirement will prevail. Contact the Legal Department for guidance if you encounter any conflicts between this Policy and national/local requirements.

7.0 Related Documents and Appendices

7.1 Related Documents

- Code of Conduct
- Third Party Intermediary Due Diligence and Management Procedure

7.2 Appendices

- Appendix A – Gifts and Contributions Guidelines.



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Appendix A – Gifts and Contributions Guidelines

	Customers	Government Officials
Gifts	<p>Must:</p> <ul style="list-style-type: none"> • <u>Be permitted by local law and regulation.</u> • Be permitted by the Recipients employer policies. • Be modest, customary, inexpensive in value, infrequent (e.g. every 6 months), not exceed local legal maximum value, and appropriate to the Recipient's position and circumstances. • Be provided in connection with a bona fide and legitimate business purpose. • Not be a cash payment (gifts of cash or cash equivalents such as gift certificates, gift cards, vouchers, or loans). • Not be given to spouses, children, friends or guests or any other person who does not have a bona fide professional interest in Varex business. 	<ul style="list-style-type: none"> • Not permitted under any circumstances.
Entertainment	<p>Must:</p> <ul style="list-style-type: none"> • <u>Be permitted by local law and regulation.</u> • Be permitted by the Recipients employer policies. • Be reasonable, part of a widely attended event, and a pre-approved exception is granted in writing by the Legal and Compliance Department prior to engaging in any Entertainment activity. • Only involve persons who have a bona fide professional interest in Varex business. • Not be given to spouses, children, friends or guests or any other person who does not have a bona fide professional interest in Varex business. <p>Note: In limited circumstances spouses may be pre-approved as part of an exception request submitted to the Legal Department prior to engaging in any hospitality or meals activity with a spouse.</p>	<ul style="list-style-type: none"> • Not permitted under any circumstances.



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<p>Hospitality and Meals</p>	<p>Must:</p> <ul style="list-style-type: none"> • <u>Be permitted by local law and regulation.</u> • Be permitted by the Recipients employer policies • Be modest in nature and expense, and incidental to an official business meeting/interaction. • Comply with local law and policy and must be permitted by the Recipients own employer policies. • Only involve persons who have a bona fide professional interest in Varex business. • Not given to spouses, children, friends or guests or any other person who does not have a bona fide professional interest in Varex business. <p>Note: In limited circumstances spouses may be pre-approved as part of an exception request submitted to the Legal Department prior to engaging in any hospitality or meals activity with a spouse.</p>	<ul style="list-style-type: none"> • In limited circumstances and during the course of an official business interaction with a Government Official, modest meals may be provided if the meal time overlaps with the interaction and occurs during normal business hours, consistent with the limitations outlined for “Customers ”. • Please check with the Legal and Compliance department prior to any business meeting with government officials that may fall into this category.
<p>Travel and Lodging</p>	<p>Must:</p> <ul style="list-style-type: none"> • <u>Be permitted by local law and regulation.</u> • Be modest and comply with Varex’s travel policy. • Be permitted by the Recipients employer policies. • Be processed through Varex’s approved travel agencies (including air, lodging, car rentals). • Be limited to the duration of the event or meeting only. • Not be offered or provided to family members, friends, guests, or any others that do not have a bona fide professional interest in Varex business. 	<ul style="list-style-type: none"> • Please check with the Legal and Compliance department prior to any business meeting with government where you want to offer or are being asked to provide travel and lodging.
<p>Political and Charitable Contributions</p>	<ul style="list-style-type: none"> • The use of Varex funds, property, services, or Anything of Value for or in aid of political parties or candidates for public office is generally prohibited. Any exception requires 	<ul style="list-style-type: none"> • Not permitted under any circumstances.



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	<p>the prior written approval of Varex's Legal Department.</p> <ul style="list-style-type: none"> Charitable donations or contributions may be provided to tax-exempt, bona fide charitable organizations. All charitable contributions provided must be aligned to Varex's charitable giving programs and policies. All political and charitable contributions must be pre-approved by the Legal and Compliance Department. 	
Sponsorships	<ul style="list-style-type: none"> Must comply with local law. Must only be provided in exchange for a promotional activity. Value must be equivalent to the value of the promotional activity Varex receives in exchange for the funding. All sponsorships must be pre-approved by the Legal and Compliance Department. 	<ul style="list-style-type: none"> Not permitted under any circumstances.

Signatures

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

Name

Sunny Sanyal

Kim Honeysett

Victor Garcia

Sam Maheshwari