

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION**

Washington, D.C. 20549

FORM SD

SPECIALIZED DISCLOSURE REPORT

VAREX IMAGING CORPORATION

(Exact name of the registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

001-37860
(Commission
File Number)

81-3434516
(IRS Employer
Identification No.)

1678 S. Pioneer Road, Salt Lake City, Utah
(Address of principal executive offices)

84104
(Zip code)

Kimberley E. Honeysett **(801) 972-5000**
(Name and telephone number, including area code, of the person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

☒ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2019.

Section 1 – Conflict Minerals Disclosure

Item 1.01. Conflict Minerals Disclosure and Report

Varex Imaging Corporation (the “Company”) has concluded in good faith that during 2019,

- a) The Company has manufactured and contracted to manufacture products as to which “conflict minerals” (as defined in Section 1, Item 1.01 (d) (3) of Form SD) are necessary to the functionality or production of such products.
- b) Based on a “reasonable country of origin inquiry”, the Company knows or has reason to believe that a portion of its necessary conflict minerals originated or may have originated in the Democratic Republic of the Congo or an adjoining country (collectively, sometimes referred to as the “Covered Countries”). Further the Company has determined that smelters and refiners identified as sourcing from the Covered Countries have been audited by the Responsible Minerals Initiative (RMI) and validated as “compliant”.

The Company’s reasonable country of origin inquiry employed a combination of measures to determine whether the necessary conflict minerals in any of the Company’s products originated from the Covered Countries. The Company’s primary means of determining country of origin of necessary conflict minerals was by conducting a supply-chain survey with direct vendors using the Responsible Business Alliance/Global e-Sustainability Initiative (RBA/GeSI) Conflict Minerals Reporting Template. The Company surveyed its direct vendors that were determined to have or had a high likelihood of containing tin, tantalum, tungsten or gold in their products. Additionally, the Company used the RMI website (<http://www.responsiblemineralsinitiative.org/>), smelter company websites, and other online tools to provide additional country of origin information.

Below is a summary of the information collected from all supply-chain survey respondents.

Conflict Mineral	Countries of Origin
Gold	Argentina, Austria, Belgium, Benin, Bolivia (Plurinational State of), Brazil, Canada, Chile, China, Colombia, Czech Republic, Denmark, Ecuador, Eritrea, Estonia, Finland, France, Germany, Ghana, Guinea, Guyana, Hong Kong, Hungary, India, Indonesia, Ireland, Italy, Japan, Jordan, Lithuania, Luxembourg, Mali, Malta, Mauritania, Mexico, Monaco, Netherlands, Nicaragua, Niger, Norway, Panama, Peru, Philippines, Poland, Romania, Russian Federation, Rwanda, Saudi Arabia, Singapore, Slovakia, South Africa, South Korea, Swaziland, Sweden, Switzerland, Taiwan, Tanzania, Thailand, Togo, Turkey, Uganda, United Arab Emirates, United Kingdom, United States of America
Tantalum	Australia, Austria, Belarus, Bolivia, Bolivia (Plurinational State of), Brazil, Burundi, China, Colombia, Ethiopia, France, Germany, Guinea, India, Indonesia, Ireland, Israel, Japan, Madagascar, Malaysia, Mozambique, Namibia, Nigeria, Russian Federation, Rwanda, Sierra Leone, Somaliland, Spain, Switzerland, Thailand, United States of America, Zimbabwe, Democratic Republic of the Congo*
Tin	Angola, Australia, Austria, Belarus, Belgium, Benin, Bolivia (Plurinational State of), Brazil, Burundi, Canada, Chile, China, Colombia, Croatia, Czech Republic, Denmark, Egypt, El Salvador, Estonia, France, Gabon, Germany, Guinea, Hong Kong, Hungary, India, Indonesia, Israel, Italy, Japan, Kazakhstan, Laos, Lebanon, Malaysia, Mexico, Mongolia, Morocco, Myanmar, Netherlands, New Zealand, Nigeria, Pakistan, Peru, Philippines, Portugal, Qatar, Russian Federation, Rwanda, Saudi Arabia, Senegal, Singapore, Slovakia, Slovenia, South Africa, South Korea, Spain, Sudan, Switzerland, Taiwan, Tanzania, Thailand, Togo, Tunisia, Turkey, Uganda, Ukraine, United Arab Emirates, United Kingdom, United Kingdom of Great Britain and Northern Ireland, United States of America, Venezuela, Vietnam, Yemen, Democratic Republic of the Congo*
Tungsten	Australia, Austria, Belgium, Bolivia, Brazil, Burundi, Canada, China, Columbia, Czech Republic, France, Germany, Guinea, Hong Kong, Indonesia, Japan, Laos, Latvia, Malaysia, Mongolia, Myanmar, Nigeria, Peru, Portugal, Russia, Russian Federation, Rwanda, Spain, Taiwan, Thailand, Uganda, United Arab Emirates, United Kingdom of Great Britain and Northern Ireland, United States of America, Uzbekistan, Vietnam, Democratic Republic of the Congo*

**The reported tantalum from the DRC came from 7 smelters, reported tin from DRC came from 2 smelters, and reported tungsten from DRC came from 2 smelter all of which have been audited and validated as conformant by the RMI, which is internationally recognized for conflict free validation audits.*

Conflict Minerals Disclosure

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934, the Company has filed this Specialized Disclosure Form (Form SD) with the Securities and Exchange Commission and the associated Conflict Minerals Report and both documents are posted to a publicly available Internet site at <https://www.investors.vareximaging.com>

Item 1.02. Exhibits

The Conflict Minerals Report required by Item 1.01 is attached as Exhibit 1.01.

Item 2.01. Exhibits

[1.01. Conflict Minerals Report as required by Items 1.01 and 1.02.](#)

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SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

VAREX IMAGING CORPORATION

(Registrant)

/s/ Kimberley E. Honeysett

Kimberley E. Honeysett

Senior Vice President, General Counsel and Corporate Secretary

May 31, 2020
