

	Conflict Minerals/Responsible Minerals Sourcing Policy		
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	Regulatory Affairs	20004772	Equal to date of last Approver

Conflict Minerals/Responsible Minerals Sourcing Policy

Varex Imaging Corporation is committed to the responsible sourcing of minerals and metals, including tin, tantalum, tungsten, and gold (3TG), and conducts due diligence consistent with internationally recognized responsible sourcing standards. Varex applies this policy to all suppliers globally, including sourcing from conflict-affected and high-risk areas (CAHRAs) such as the Democratic Republic of Congo and adjoining regions. The company does not knowingly source minerals that directly or indirectly finance armed conflict or contribute to serious human rights abuse and supports ethical supply chains aligned with internationally recognized standards.

This policy aligns with the OECD Due Diligence Guidance for Responsible Mineral Supply Chains, including Annex II risk expectations, EU Regulation 2017/821 where applicable, Section 1502 of the U.S. Dodd-Frank Act and related SEC rules, and the UN Guiding Principles on Business and Human Rights. Varex maintains a due diligence framework consistent with OECD guidance, including internal governance, clear assignment of responsibilities, and recordkeeping practices to support compliance.

Consistent with Annex II of the OECD Due Diligence Guidance for Responsible Mineral Supply Chains, Varex is committed to avoiding direct or indirect support to non-state armed groups and to identifying, assessing, and addressing risks associated with mineral sourcing from conflict-affected and high-risk areas. Varex does not tolerate serious human rights abuses, and Varex also prohibits direct or indirect support to public or private security forces that illegally control, tax, or otherwise benefit from mineral extraction, transport, trade, or export. Furthermore, Varex does not engage in, or knowingly support bribery, fraudulent misrepresentation of the origin of minerals, money laundering, or the non-payment of legally required taxes, fees, and royalties owed to governments. Where such risks are identified, Varex will implement proper risk mitigation measures consistent with its due diligence process and applicable international standards.

Varex conducts supply chain due diligence by collecting standardized supplier disclosures, including use of recognized reporting templates, and assessing risks associated with sourcing practices, smelters, refiners, and geographic regions. Identified risks are addressed through supplier engagement, escalation where appropriate, and, if necessary, disengagement from suppliers that do not demonstrate improvement. Varex supports responsible sourcing by prioritizing use of smelters and refiners validated through recognized independent audit programs, including the Responsible Minerals Assurance Process.

Varex fulfills applicable regulatory obligations by conducting a Reasonable Country of Origin Inquiry, performing due diligence on the source and chain of custody of 3TG minerals, maintaining documentation to demonstrate compliance, and submitting required disclosures such as Form SD and, where applicable, Conflict Minerals Reports. Public disclosures are made in accordance with regulatory requirements.

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Suppliers are expected to adopt policies consistent with this policy, source responsibly, avoid contributing to conflict or human rights abuses, provide accurate and timely disclosures using industry-standard tools, cooperate with due diligence activities, and cascade these expectations throughout their supply chains. Failure to meet these expectations may result in corrective actions or termination of the business relationship.

Varex supports internationally recognized human rights by prohibiting forced and child labor, preventing discrimination and abuse, and promoting responsible and ethical sourcing practices. The company maintains a continuous improvement approach by monitoring regulatory developments, enhancing supply chain transparency, participating in industry initiatives, and providing training where appropriate.

Concerns related to conflict minerals sourcing or supply chain practices may be reported through established ethics and compliance reporting channels, with protection against retaliation. Oversight of this policy is maintained by senior leadership with support from cross-functional teams, and the policy is reviewed periodically and updated as needed to ensure continued effectiveness and alignment with legal requirements.

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1074814 - Establish	05JAN2018
EC-0013627 - Update 20004772 to rev AB - Conflict Minerals/Responsible Minerals Sourcing Policy	Equal to date of last Approver

Signatures	<i>"The electronic signature record will be appended to the last page of the secured document."</i>
NAME	
Victor Garcia	
Matthew Martinez	



Document Signing Page

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

Approver: Victor Garcia, Date: Jul 2, 2026 6:24 AM MDT, Meaning: I acknowledge my electronic signature carries the same meaning as a handwritten signature

Approver: Matthew Martinez, Date: Jul 2, 2026 5:08 PM MDT, Meaning: I acknowledge my electronic signature carries the same meaning as a handwritten signature