

Varex Imaging Corporation

Code of Conduct

At Varex, our mission is, through the talent of our people and vision of our customers, we help improve and save lives throughout the world by making the invisible visible. In fulfilling our mission, we place a 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 – Execution, People, Integrity, and Collaboration – drive our actions. We developed this Code of Conduct (the “Code”) to provide you with guidance for daily business activity where questions could arise. The guidance may state that certain conduct is acceptable or unacceptable, or may assist with avoiding the appearance of impropriety or misconduct. Where you have questions, please do not hesitate to reach out to any of us or your local representative in the Human Resources or Legal departments. Failure to comply may result in disciplinary action, including termination. Ultimately, our success depends not only on compliance with this Code and our corporate policies, but also on the honesty, fairness, integrity, good common sense, and discretion brought to the job by each of us.

Compliance is owned by all Varex employees. Our reputation as a company of the highest integrity means everything. We are confident that our commitment to ethical compliance is not just a “defensive” measure. Rather, it is a competitive advantage that will allow us to grow and to succeed.

Sunny Sanyal
President and CEO

Shubham “Sam”
Maheshwari
Chief Financial Officer

Matthew Martinez
Chief Legal Officer

Karen Aranki
Chief HR Officer

Mark Jonaitis
SVP and GM,
X-ray Tubes

Andrew Hartmann
SVP and GM,
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GM, Industrial

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TABLE OF CONTENTS

INTRODUCTION - DO WHAT'S RIGHT	1
Who must follow the Code?	
Knowing and doing what's right	
What each of us should do	
How to seek advice and raise concerns	
Violations and non-retaliation	
MARKETPLACE.....	3
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	
FELLOW EMPLOYEES.....	6
Workplace and mutual respect	
Human rights	
Harassment and bullying	
Fair employment	
Health and safety	
Employee and customer data privacy	
COMMUNITY AND ENVIRONMENT	7
Political contributions	
Environmental sustainability	
Communicating on behalf of the Company	
Social media	
COMPANY ASSETS AND INFORMATION	8
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	
AMENDMENTS, MODIFICATIONS, AND WAIVERS	12

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. References to the "Code" mean this Code of Conduct.

If you have any questions about any aspect of this Code of Conduct (the “Code”), please contact the Varex Legal Department at legal@vareximaging.com.

INTRODUCTION - DO WHAT'S RIGHT

Who must follow the Code?

This Code applies to all of us, including our Board members, officers, and other employees. It governs our business decisions and actions regardless of where we are located and applies to 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).

This Code applies to all of us.

Each of us is responsible for complying with the Code, Varex policies, and the law, and to take applicable training where assigned. We also expect our business partners and other stakeholders to uphold similar ethical standards.

Knowing and doing what's right

This Code attempts to address the most common legal and ethical issues you may encounter. When deciding whether an action is ethical and in compliance with this Code, ask yourself the following questions:

- Does my action align with our EPIC Core Values of Execution, People, Integrity, and Collaboration?
- 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?

Ask yourself: Do my actions comply with our EPIC Core Values and is it the right thing to do?

Please remember that retaliation against any person who raises good faith concerns or reports, in good faith, violations of law, regulations, the Code, or Company policies is prohibited.

This Code refers to a number of policies that also cover topics included in this Code. Links to those policies have been provided where referenced.

What each of us should do

- Understand and comply with your obligations under this Code and Company policies, and 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 and in Company policies, including applicable country, state and local policies.
- Attend and complete applicable compliance training sessions.
- Uphold the ethical standards of the Code, and follow the policies, procedures, and practices that support them.
- Promptly report potential violations, fully cooperate with Company investigations, and do not attempt to investigate matters yourself.

- Do not put short-term business goals above Varex's commitment to compliance and ethics.

If you are a manager, in addition to the employee expectations:

- Encourage ethical conduct and lead compliance efforts by example, creating a culture in which employees understand their ethical responsibilities and can raise good faith concerns without fear of retaliation.
- Create a workplace based on mutual respect and professionalism. Do not tolerate harassment, bullying, intimidation, or retaliation.
- Serve as the first point of contact when team members have questions and concerns, and provide clear guidance. Rely on others if you need assistance addressing the question or concern.
- Facilitate employee attendance and timely completion of compliance training and allow your employees to fully cooperate with Company investigations.
- Refer all unethical behavior and illegal conduct you witness or about which you receive a report.
- 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 our stakeholders to promptly come forward with questions or concerns about possible violations of laws, the Code, ethical business standards, accounting and auditing standards, or Company policies. Investigating all reports of possible non-compliance or unethical behavior helps Varex maintain the integrity of the ethical compliance program.

Varex maintains an online and telephone reporting Helpline 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, and more information on how to access the Helpline is available on Varex's internal and external websites and is posted at Varex locations. In most countries, reports may be made anonymously, and if permitted the Helpline will make this option available to you.

Speak up! Your feedback makes Varex a better place to work.

Our Helpline is available 24/7/365.

IMPORTANT: *For individuals in certain countries, the Helpline 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.*

Even though in most countries you may report anonymously, you are encouraged to agree to further communications with Varex (which may be done anonymously through the Helpline) when reporting an incident so that we can investigate more thoroughly. Reports will be treated fairly and objectively and will be kept in confidence to the extent it is reasonably possible to do so, subject to duties arising from applicable laws, regulations, or legal proceedings.

Violations and non-retaliation

Violations of this Code 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, 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. Please report suspected retaliation to your local Human Resources or Legal representative, or to the Helpline at <https://faceup.com/c/vareximaging>.

We will not permit retaliation against good faith reports of violations of law, regulations, the Code, or Company policies.

Key Contacts

Throughout this Code, we encourage questions and concerns to be directed to various departments. For reference, the referenced departments can be reached through the following email addresses, which are regularly monitored:

Legal Department: legal@vareximaging.com

HR: humanresources@vareximaging.com

Employee Safety/Regulatory and Quality Assurance:
xrp-qualityassurance@vareximaging.com

You are also encouraged to reach out directly to your local representatives, as appropriate.

MARKETPLACE

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.

Applicable rules can conflict. Please reach out with questions.

Sometimes, there may be a conflict between the laws of different countries, or between applicable law and the Code. When you encounter a conflict, please consult the Varex Legal Department to understand how to resolve the conflict properly and to avoid creating potential risk.

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 this Code. If there is a conflict between business policies, procedures and guidelines and this Code, or any legal requirements, you should apply the most

stringent standard. If you see such a conflict, please bring it to the attention of the Varex Legal Department.

Product safety and quality

Providing products and services that are safe for end users and of high quality is paramount to Varex. Varex has a responsibility to manufacture and commercialize its products to meet legal and regulatory requirements governing their design, manufacture, and supply. To that end, we provide regular training on quality and regulatory requirements, and expect employees to follow our Quality Policy Manual.

We strive to deliver high quality products that enable our customers' success.

Relationships with health care professionals ("HCPs")

Varex works from time to time with health care professionals ("HCP"), which are, among other things, entities or individuals (such as doctors, nurses, and other hospital professionals) that provide health care services and have the ability to influence the purchase of a company's products and services. Relationships with HCPs are subject to strict laws and regulations (which vary from country to country), of which all Varex employees and agents should be aware and comply. Interactions with HCPs must follow Varex procedures, and any payments or other consideration provided to HCPs must be analyzed for potential transparency reporting. If you expect or intend to interact with an HCP, please reach out to the Legal Department prior to any such interaction for more detailed guidance.

Please review our Global Anti-Corruption Policy for more information on working with HCPs.

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 HCPs 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 applicable laws and comply with our Global Anti-Corruption Policy, which provides more detailed guidance as to what may and may not be acceptable.

Do not accept or provide business courtesies except in compliance with our Global Anti-Corruption Policy.

Please contact the Varex Legal Department for assistance determining whether offering or accepting a particular business courtesy would be acceptable.

Bribery and other corrupt payments

Bribery and other corrupt payments are prohibited by law throughout the world and may result in serious fines, penalties and jail time. 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, discounts, rebates, or anything else of value. A bribe is illegal whether it is made directly or through a third party. 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 their 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 Global Anti-Corruption Policy for more information.

Do not give, offer, accept, or facilitate a payment that may be perceived as a bribe.

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 regarding fair competition (also referred to as "antitrust" laws) wherever we do business. These laws apply to many aspects of our business and are very broad and complex. It is important to understand how these laws can impact your everyday activities, so please seek guidance from the Legal Department if you think that something you are working on may impact competition or fair dealing.

We compete fairly and on the merits of our products and services.

Trade compliance

Many countries regulate international trade transactions, such as imports, exports, and international financial transactions. 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 (available on Varex's intranet).

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 (for example those that support nuclear proliferation, missile technology, and chemical and biological weapons). As these laws are complex and frequently change, employees should contact export@vareximaging.com for guidance on any proposed business activity related to sanctioned countries or with a restricted party or end use.

Working with third parties

From time to time, Varex engages individuals or companies that provide products and services on Varex's behalf. The actions of these third parties can be attributed to Varex. Varex takes a risk-based approach to working with third parties, performs appropriate due diligence on them, and requires them to take appropriate training prior to working with us. Please contact ethics@vareximaging.com before working with any third parties.

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 involves or appears to involve disguising or channeling unlawfully obtained money, or transforming such money into legitimate funds. 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; Harassment and bullying

At Varex, we each play a role in creating and maintaining a work environment where employees are valued and respected. Harassment, discrimination, intimidation, bullying, and retaliation are prohibited in the Varex workplace, including when engaging with our business partners, customers, and other stakeholders. Varex does not tolerate discrimination or harassment against anyone based on a protected characteristic under any applicable law.

We are committed to a workplace where employees are valued and respected.

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 their behavior in a clear, professional manner. You may also report such behavior or concern, and retaliation is prohibited when you act in good faith to report an incident of harassment, bullying or intimidation.

Varex is proud to be a global company with diverse employees, business partners, and other stakeholders. We encourage an appreciation and respect for each of their unique backgrounds, cultures, experiences, values, beliefs, thoughts and talents. We value input from others who may have a different perspective and encourage an environment of trust and openness. We should all strive to understand, respect, and value inclusion, diversity, and equity as part of our EPIC Core Values.

Fair employment

Varex is firmly committed to providing equal employment opportunities to current and prospective employees. The Company bases employment decisions on business needs and 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. 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. Varex and 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. If you encounter an unsafe work environment, please report it through Workday or to xrp-qualityassurance@vareximaging.com.

We value a safe workplace and are committed to preventing injury wherever possible.

Employee and customer data privacy

Varex is committed to protecting data belonging to our employees and our customers, and complies with applicable laws and Company policy in the handling of this data. 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 reasonable precautions to preserve its confidentiality. Employees have access to their own records according to local laws.

Human rights

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.

We are committed to protecting internationally recognized human rights.

COMMUNITY AND ENVIRONMENT

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 or to contact a government official on behalf of Varex for political purposes. When you personally participate in the political process, you may only do so using your own money, time and resources.

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 EPIC Core Values. Please refer to our Environmental Policy and our annual ESG/Sustainability Report for additional information.

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. 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.

We are committed to providing clear and accurate information to our stakeholders.

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 authorized business purposes, focus on creating value for our investors and customers. Only post accurate, public information and never confidential information, do not claim to be speaking on behalf of the Company, and avoid making claims about our products unless the Marketing, Legal, and Regulatory departments have approved them. Additional guidance regarding supporting Varex on LinkedIn is available on the Varex intranet.

Use social media responsibly and in accordance with our guidelines.

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

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. Even the appearance of a conflict of interest should be avoided. For Varex Board members or employees, this may include recusal from discussions when participation could be perceived as creating a conflict.

A conflict of interest occurs when private interests (or the interests of a family member) interfere, or even appear to interfere, with Varex's interests or make it difficult to perform work for Varex objectively and effectively.

Avoid even the appearance of a conflict of interest.

Clear all potential conflicts with your manager and Legal.

While not a complete list, 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;
- receiving improper personal benefits as a result of your role with Varex; or
- other actions that make it difficult to perform your responsibilities for Varex.

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 and Intellectual Property

Confidential information about Varex, including trade secrets and business, financial, technical, proprietary, and personnel information, whether written, oral or electronic, is important Varex property. Intellectual property, including trade secrets, is one of Varex's most valuable assets. Intentional or inadvertent disclosure of confidential or proprietary information could seriously harm Varex's financial performance and competitive position and could compromise our rights to intellectual property. 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. At the same time, it is important to respect the valid intellectual property rights of others and comply with the terms of any

Protect our confidential information, including intellectual property.

Respect the confidential information of others.

agreements relating to our business relationships. 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. You have a duty to protect this information and not use or disclose it improperly.

Nothing in this policy or Code prevents you from:

- communicating with any government agency or commission, including to provide documents or other information, without notice to Varex;
- sharing compensation information about yourself or others (unless you only have access to this information due to your job responsibilities); or
- discussing or disclosing information about unlawful acts in the workplace, including reporting violations of law to any regulator or law enforcement.

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.

If you are aware of material inside information about a company (i.e., news about a company not known to the investing public that could reasonably be expected to alter the total mix of information available about a company or affect the price of a company's stock), 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 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 under your or their control. Please review our Insider Trading Policy for more information.

Do not trade on materials, inside information or suggest that others do so.

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 manager.

Use Company systems and assets responsibly and for legitimate business purposes.

Each of us is prohibited from using company information or our position with the Company 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. More specifically, each of us is prohibited from taking (or directing to a third party) a

business opportunity that is discovered through the use of company information or our position with the Company.

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. Please log a service request with the IT Help Desk if you have any questions about use of company networks, communication systems, or IT tools (including artificial intelligence).

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. Please check with your local HR representative for more information on local rules that may apply.

Government agency complaints and requests for information

Occasionally, an applicant, customer, or current/former employee may file — or threaten to file — a complaint against the Company with the government. If you are contacted about a government complaint, immediately contact your local Legal Department representative or email legal@vareximaging.com. Neither your manager nor the Company are permitted to take any action against you for making or reporting a government complaint.

We will always cooperate appropriately with proper government requests or investigations. If you are asked by a government official to provide Company information (either written or orally) for a government investigation — or if a government representative visits your workplace asking for Company records, documents or other information — immediately notify your local Legal Department representative. You should always give truthful, accurate information, and never try to obstruct, influence or impede the request for information. You also should not alter, falsify, mutilate, cover up, dispose of or destroy any documents or records related to a government request, investigation or legal proceeding.

Alert the Legal Department if you are contacted by a government agency. We must reasonably cooperate with government requests.

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.

Keep accurate books and records.

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, you 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.

AMENDMENTS, MODIFICATIONS, AND WAIVERS

This Code 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 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.