



## **ACCURAY INCORPORATED HUMAN RIGHTS POLICY**

### **A. RESPECT FOR HUMAN RIGHTS**

Accuray aims to be a positive social presence in every community where we work. We strive to promote human rights in our relationships with our employees, suppliers, vendors and business partners. To this end we support and promote the principles of the United Nations' Universal Declaration of Human Rights and the human rights protections set forth in the laws of the United States and the states and communities in which we operate. We will endeavor to assess implications to human rights of major business decisions and seek dialogue with stakeholders in the communities in which we operate.

This policy applies to all of the operations of Accuray Incorporated and its direct and indirect subsidiaries (together, "**Accuray**"), regardless of geographic location. We expect our suppliers, vendors and business partners to uphold these principles and urge them to adopt similar policies within their own businesses. Furthermore, Accuray's Supplier Code of Conduct sets forth our expectations of our suppliers regarding business ethics.

### **B. DIVERSITY AND INCLUSION**

We value and advance the diversity and inclusion of the people with whom we work. Accuray's workplace policies and practices include commitments to equal opportunity in workplaces that are free from discrimination or harassment on the basis of race, color, religion, national origin, gender, gender identity, sexual orientation, marital or pregnancy status, age, disability, veteran status or other characteristics protected by law. These policies are outlined in our Code of Conduct and Ethics. Accuray provides its Code of Conduct and Ethics to its employees and periodically provides training to employees on topics covered in the Code of Conduct and Ethics.

### **C. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

We strive to create workplaces in which open and honest communications among all employees are valued. We fully support the principles of the International Labour Organization's fundamental conventions with respect our employees' right to form, join or not join, labor unions, without fear of reprisal, intimidation or harassment. In the case of employees represented by a legally recognized union, we are committed to bargaining in good faith with that union. Furthermore, we expect the same commitment from suppliers as outlined in our Supplier Code of Conduct.

### **D. HEALTH AND SAFETY OF WORKPLACE**

Accuray is committed to the protection of human health, safety and the environment in all of the global communities and facilities where we conduct our business. Accuray is also committed to conducting our business in compliance with all applicable environmental and workplace health and safety laws and regulations. Accuray strives to provide a safe and healthy work environment for our employees and to avoid adverse



impact and injury to the environment and communities in which we conduct our business. Achieving this goal is the responsibility of all of Accuray's officers, directors and employees worldwide. Furthermore, Accuray's Supplier Code of Conduct sets forth our expectations of our suppliers regarding the health and safety of their workplace.

#### **E. WORKPLACE SECURITY**

We are committed to safe and healthy working conditions that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. We conduct our security operations in alignment with national legal requirements and international standards. We strive to train our security people employed to protect our property in using power to an extent matching the threats they may be facing, without infringing the freedom and safety of others. We strive to ensure that private security personnel do not interfere with peaceful demonstrations or other democratic processes in civil society.

#### **F. FORCED LABOR AND HUMAN TRAFFICKING**

We prohibit the use of all forms of forced labor, including bonded labor, involuntary prison labor, indentured labor, modern forms of slavery, servitude, human trafficking or work performed under the menace of a penalty or coercion. We are committed to evaluating the potential for forced labor and human trafficking in our supply chain and minimizing risks by committing to work with suppliers, vendors and business partners who adhere to our Supplier Code of Conduct, which prohibits forced labor and human trafficking. We have a no tolerance policy for employees, suppliers, vendors and business partners in violation of our company standards regarding slavery and human trafficking and anyone in violation of those standards is subject to termination.

Furthermore, although everyone's human rights and fundamental freedoms must be respected and upheld, in particular, we strive to promote, protect and help ensure the equal enjoyment of human rights of vulnerable groups, minorities, women, or those whose circumstances open them up to exploitation or the abuse of their rights.

#### **G. CHILD LABOR**

We are committed to complying with all local minimum working age laws and requirements and prohibit the use of child labor.

#### **H. WORK HOURS, WAGES AND BENEFITS**

We compensate our employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements and applicable legal standards. We work to ensure full compliance with applicable wage, work hours, overtime and benefits and other labor laws. We are committed to paying living wages under humane conditions.



## **I. RIGHT TO WATER**

We recognize the right to water as a fundamental human right. We respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation.

## **J. MONITORING**

While suppliers are expected to self-monitor and demonstrate their compliance with this policy, Accuray and its designated agents (including third parties) may also monitor suppliers' compliance with this policy and initiate dialog to achieve improvements.

## **K. COMPLIANCE, TRAINING AND REPORTING FOR EMPLOYEES**

This policy will be communicated to all employees and will be available publicly. All employees are required to complete yearly training on Accuray's Code of Conduct, which references this policy.

You should not accept any direction by your supervisor which is inconsistent with this policy. If you are ever concerned that anyone connected with us may have engaged or is about to engage in any conduct in violation of this policy, you should promptly bring the matter to the attention of our Corporate Compliance Officer. If you do not believe that talking to our Corporate Compliance Officer is appropriate, if you are uncomfortable doing so, or if it does not result in a response with which you are comfortable, then you should contact our independent third party reporting partner, EthicsPoint, at 1-800-499-8895 or [www.EthicsPoint.com](http://www.EthicsPoint.com) through which you may choose to identify yourself or remain anonymous.

We may waive the application of the policies set forth in this policy where circumstances warrant granting a waiver, subject to appropriate terms and conditions. This policy is not intended to, and does not, grant any rights to any director, officer, employee, tenant, supplier, competitor, stockholder or any other person or entity.