



ACCURAY INCORPORATED

California Transparency in Supply Chains Act Disclosure Statement

Accuray Incorporated (“**Accuray**,” “**we**” or “**our**”) seeks to foster a culture of compliance with all applicable laws, rules, and regulations, and the highest standards of ethics and business conduct with respect to forced labor and human trafficking and slavery. We are making this statement to comply with the California Transparency in Supply Chains Act of 2010, which requires us to disclose measures we use to track possible slavery and human trafficking in our supply chains.

Accuray expects all of its suppliers in its supply chain to comply with its Supplier Code of Conduct and all applicable laws and regulations, including, without limitation, those applicable to environmental protection, wages, hours, equal employment opportunity, nondiscrimination, health, safety, working conditions, child labor laws and laws against slavery and/or human trafficking. Accuray’s Supplier Code of Conduct expressly prohibits forced labor or human trafficking and slavery in our operations or in the operations of our suppliers.

Verification and Audits; Supply Agreements

Although Accuray is endeavoring to have written agreements with all of its suppliers requiring them to comply with our Supplier Code of Conduct and all applicable laws, however, we cannot guarantee that this is the case for all of the suppliers in our supply chain. We treat violations of our Supplier Code of Conduct seriously and violations may be grounds for disciplinary action, up to and including termination of contracts with our suppliers.

Accuray complies Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “**Conflict Minerals Act**”) and with the Organization for Economic Cooperation and Development (OECD) guidelines - an internationally recognized framework for to evaluate the risk of conflict minerals in our supply chain. Our direct suppliers who we believe supply us with components that may include conflict minerals are expected to exercise due diligence on the source and chain of custody of conflict minerals in the products they provide to Accuray, to disclose their information on due diligence to Accuray on request, and to source minerals from responsible sources that do not contribute to human rights abuses in the Democratic Republic of the Congo and adjoining countries. Accuray’s conflict minerals statement can be found on the following link: <http://investors accuray.com/corporate-governance>.

Accuray is committed to evaluate the potential for forced labor and human trafficking in our supply chain and minimize 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. Accuray maintains the right to perform audits on suppliers, by itself or through a third party. Except for the work being done to ensure compliance with the Conflict Minerals Act, Accuray does not conduct verification or audits



concerning slavery and human trafficking. Under Accuray's Supplier Code of Conduct, Accuray suppliers are also required to self-monitor and demonstrate their compliance with the Supplier Code of Conduct. If deviations from the Supplier Code of Conduct and/or applicable laws are found either from Accuray's audits or supplier's self-monitoring, such supplier shall take corrective actions in cooperation with Accuray.

Accuray's Supplier Code of Conduct expressly prohibits child labor, slavery and human trafficking. Accuray is evaluating its supply chain processes to consider how it can further support the elimination of child labor, slavery and human trafficking.

Internal Accountability, Procurement Training

All employees and contractors of Accuray, including those responsible for supply chain management, are required to comply with Accuray's Code of Conduct and Ethics, which includes requirements to comply with applicable law and transact business in an honest, ethical and professional manner. Though Accuray's Code of Conduct and Ethics does not contain express language concerning human rights abuses in the supply chain, the code does include reference to and requires compliance with Accuray's Human Rights Policy. Accuray maintains internal accountability standards and procedures for both employees and contractors failing to meet company standards set forth in Accuray's Human Rights Policy regarding slavery and trafficking. In addition, all Accuray employees train annually on Accuray's Code of Conduct and Ethics. Likewise, all contractors assigned to Accuray are required to review and abide by Accuray's Code of Conduct and Ethics.

To promote compliance with our Code of Conduct and Ethics, Accuray maintains a compliance program that investigates potential violations of the Code of Conduct and Ethics and takes disciplinary action when necessary. We encourage all our employees, officers, directors and business partners to promptly come forward with questions or concerns about possible violations of laws, the Code of Conduct and Ethics, ethical business standards, accounting and auditing standards or Accuray policies. They are also encouraged to seek guidance when in doubt about their responsibilities under the Code of Conduct and Ethics, company policies or the requirements of applicable laws or regulations. Accuray has a confidential online and telephone reporting service operated by our independent third party reporting partner, EthicsPoint, at 1-800-499-8895 or www.EthicsPoint.com.

Furthermore, we are committed to working to provide training to all employees responsible for procurement of materials for Accuray's products, specifically with respect to our Conflict Minerals due diligence process and our Supplier Code of Conduct.