



ACCURAY UK, LTD. Anti-Slavery and Human Trafficking Statement

The UK Modern Slavery Act 2015 requires that any commercial organization in any sector, which supplies goods or services, carries on a business or part of a business in the UK, and is above a specified total turnover must produce a slavery and human trafficking transparency statement for each financial year of the organization.

Accuray Incorporated (“**Accuray**”) publishes this statement on its corporate website in the name and on behalf of Accuray UK, Ltd. (the “**Company**”). This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes the Company’s slavery and human trafficking statement for the previous financial year (ending June 30, 2019).

Our Business

Accuray UK, Ltd. is a private limited company incorporated in the United Kingdom and wholly owned by subsidiaries of Accuray. The Company is part of a group of companies (collectively, the “**group**”) in which the ultimate parent company is Accuray, a publicly traded company incorporated in the State of Delaware, United States of America (“**US**”). The group is engaged in the business of radiation oncology and develops, manufactures, sells and supports precise, innovative treatment solutions that set the standard of radiation therapy care with the aim of helping patients live longer, better lives.

The Company’s business primarily comprises of sales and service of almost exclusively group products. The Company does not manufacture products itself. However, the group’s products are complex and require the integration of a number of components from several sources. Such components are manufactured by the group or contract manufacturers or are otherwise purchased by the group from third parties. The group does not purchase raw minerals from mines, smelters, or refiners and relies on its suppliers to provide components and materials that is incorporated into its products. The group manufactures its products in the US and China; however, contract manufacturers and third party suppliers for the group are widely dispersed around the world.

Our Policies

The Company is committed to good corporate citizenship and the highest ethical standards. To fulfil these commitments, the group has established and maintains systems and controls to safeguard against slavery and related human trafficking in the supply chain of products it purchases from suppliers, which include:

- **Code of Conduct.** Accuray’s Code of Conduct and Ethics outline the group’s expectations for business conduct and includes provisions with respect to the maintenance of high ethical and legal standards, though it doesn’t expressly include provisions relating to the UK Modern Slavery Act because it is a document intended for the group’s employees worldwide. All UK employees are, therefore, expected to



comply with the Code of Conduct and Ethics and are required to review the latest version annually, such review being recorded via the group's internal training tool.

- **Supplier Code of Conduct:** Accuray is in the process of implementing a Supplier Code of Conduct, with the expectation that all suppliers in the group's supply chain will comply with such Supplier Code of Conduct and all applicable laws. Accuray's Supplier Code of Conduct will outline the group's expectations for suppliers and expressly includes provisions concerning child labor, slavery and human trafficking. The group's suppliers will be expected to self-monitor and demonstrate their compliance with the Supplier Code of Conduct. The group will reserve the right to reduce or terminate its business with suppliers for violations of the Supplier Code of Conduct.
- **Human Rights Policy:** Accuray is in the process of implementing a Human Rights Policy that affirms the group's commitment to respect and support US and international principles aimed at protecting and promoting human rights. The Human Rights Policy will apply to all of the group's operations, direct and indirect subsidiaries, suppliers, vendors and business partners. The Human Rights Policy will outline the group's expectation regarding a variety of issues including but not limited to forced labor, human trafficking, child labor, work hours, wages and benefits.
- **Ethics Reporting:** Accuray has a confidential hotline and website that is operated by our independent third party reporting partner, EthicsPoint. EthicsPoint is available both in the US and internationally to the employees of the group and its direct suppliers. EthicsPoint may be used to report any illegal, unethical, or questionable behavior relating to Accuray's Code of Conduct and Ethics, Supplier Code of Conduct and Human Rights Policy. Such reports will be investigated under the guidance and direction of Accuray's legal and compliance departments, as appropriate. The group prohibits retaliation against any individual who raises a concern, question or complaint in good faith.

Due Diligence

The group maintains the right to perform audits on suppliers, by itself or through a third party. Although the group endeavors to have written agreements with all of its suppliers requiring them to comply with all applicable laws and, when implemented, our Supplier Code of Conduct, we cannot guarantee that this is the case for all of the suppliers in our supply chain. We treat violations of applicable law and, when implemented, our Supplier Code of Conduct seriously and violations may be grounds for disciplinary action, up to and including termination of contracts with our suppliers.

Training

In an effort to keep our employees informed about the group's principles and policies concerning ethical and legal business conduct, Accuray's Code of Conduct and Ethics has been made available on Accuray's website and is provided to all new employees upon hire.



The group maintains internal accountability standards and procedures for both employees and contractors failing to meet company standards regarding slavery and human trafficking. In particular, the group's employees worldwide train annually on Accuray's Code of Conduct and Ethics. Likewise, all contractors assigned to the group are required to review and abide by Accuray's Code of Conduct and Ethics.

The Company's Board of Directors approved this Anti-Slavery and Human Trafficking Statement.

Date: October 25, 2019

/s/Shig Hamamatsu
Director