



ACCURAY INCORPORATED

Conflict Minerals Policy Statement

In July 2010, the United States Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”). Section 1502 of the Dodd-Frank Act aims to prevent the use of certain “Conflict Minerals” that, directly or indirectly, finance or benefit armed groups in The Democratic Republic of the Congo or adjoining countries (collectively, the “Covered Countries”). “Conflict Minerals” include tantalum, tin, tungsten and gold, or their derivatives, and could expand to include other minerals or their derivatives, as determined by the U.S. Secretary of State. Section 1502 of the Dodd-Frank Act mandates supply chain due diligence and public disclosure related to the sourcing of Conflict Minerals. In August 2012, the Securities and Exchange Commission (the “SEC”) issued its final rule governing, among other things, due diligence, disclosure and reporting requirements for Conflict Minerals originating from the Covered Countries that may be contributing to human rights abuses.

Accuray Incorporated and its subsidiaries (“Accuray”) are committed to sourcing components and materials from companies that share our values regarding respect for human rights, ethics and environmental responsibility. We strive to ensure that all materials used in our products originate from socially and environmentally responsible sources. We do not condone any activity that fuels conflict, leads to serious environmental degradation or violates human rights. Therefore, Accuray is committed to avoiding the procurement of products or components that contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries, or otherwise taking any action that would contribute to the financing of groups responsible for human rights violations. While Accuray does not have complete visibility into the sources of all component minerals, we are actively engaged with our suppliers to promote responsible sourcing practices.

Specifically, Accuray is:

- 1) Using a documented, reasonable due diligence process that conforms to the Organization for Economic Cooperation and Development’s (OECD) due diligence guidance and are working closely with our suppliers to determine the presence of Conflict Minerals in our supply chain.
- 2) Taking steps to determine the use, country of origin and chain of custody of Conflict Minerals in our products.
- 3) Committed to improve, over time, the ability to track and trace Conflict Minerals in our supply chain.

Accuray sources from numerous suppliers, and a large number of our suppliers and their suppliers are private companies or international companies that are not subject to SEC regulations. Accuray must therefore rely on the cooperation of its suppliers in the implementation of this policy and in enabling Accuray to meet its SEC disclosure and reporting obligations on a timely basis. Accuray expects its suppliers (and their sub-suppliers) to develop internal Conflict Mineral policies and exercise reasonable due diligence within their supply chains to determine the origin of the Conflict Minerals contained in the products and materials



they supply to Accuray. Accuray will evaluate its relationships with its suppliers on an ongoing basis to ensure continued compliance with this policy. We will reconsider our willingness to partner with any supplier that fails to comply with this policy.