

California Transparency in Supply Chains Act Disclosure Statement

Varian Medical Systems, Inc. (the “Company” or “Varian”) is making this statement to comply with the California Transparency in Supply Chains Act of 2010, which requires the Company to disclose measures it uses to track possible slavery and human trafficking in its supply chains.

Varian seeks to foster and maintain a culture of compliance with applicable laws, rules and regulations, and the highest standards of ethics and business conduct. Varian 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, export control regulations, customs laws, transportation regulations, child labor laws, and laws against slavery and/or human trafficking. Varian’s Supplier Code of Conduct expressly prohibits forced labor or human trafficking and slavery in our operations or in our supplier networks.

Verification and Audits; Supply Agreements

Although Varian endeavors to have supply agreements, quality agreements and/or purchase order terms and conditions with all of its suppliers that require them to comply with our Supplier Code of Conduct and applicable laws, we cannot guarantee that this is the case for 100% of 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.

Varian is also committed to complying with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and with the OECD guidelines - an internationally recognized framework for conflict minerals due diligence. 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 Varian, to disclose their information on due diligence to Varian 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. Varian’s conflict minerals disclosure for calendar year 2016 can be found on the following link:
<https://www.varian.com/about-varian/citizenship>

Prior to engagement of a supplier, Varian evaluates the supplier through a risk-based assessment, which may include supplier questionnaires and audits of supplier facilities. Varian's expectation for compliance with ethical and quality standards is communicated to all potential suppliers. Varian regularly audits suppliers who impact our quality system to confirm compliance with supplier performance and quality standards. Audits are performed by Varian or third parties contracted by Varian. Except for the work being done to ensure compliance with the Conflict Minerals Act, Varian does not conduct verification or audits concerning slavery and human trafficking. Under Varian’s Supplier Code of Conduct, Varian requires its suppliers to perform internal audits with respect to their compliance with the Supplier Code of Conduct. Suppliers are also required to provide Varian with reasonable access to audit and inspect suppliers’ facilities and programs, and implement a corrective action plan for any deficiencies

that are found in a timely manner.

Varian's Supplier Code of Conduct expressly prohibits child labor, slavery and human trafficking. Varian 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 Varian employees, including employees responsible for supply chain management, are required to comply with Varian's Code of Conduct, which includes a requirement to comply with applicable law and transact business in an honest, ethical, and professional manner, though there is no express language concerning human rights abuses in procurement. All Varian employees certify annually that they have read and understand the company's Code of Conduct.

To promote compliance with the company's Code of Conduct, Varian maintains a compliance program that investigates potential violations of the Code of Conduct and takes disciplinary action when necessary. We encourage all our employees, officers, Board members, and business partners to promptly come forward with questions or concerns about possible violations of laws, the Code of Conduct, ethical business standards, accounting and auditing standards, or Varian policies. They are also encouraged to seek guidance when in doubt about their responsibilities under the Code of Conduct, company policies, or the requirements of applicable laws or regulations. Varian's Confidential Helpline is an online and telephone reporting service operated by an independent private firm. This service may be used, where available, for raising questions or reporting concerns, and is accessible 24 hours a day, 7 days a week.

Finally, we provide training to employees responsible for procurement of materials for Varian's products, specifically with respect to our Conflict Minerals due diligence process and our Supplier Code of Conduct.

Training of Suppliers

Under our Supplier Code of Conduct, our suppliers are required to inform and train their employees with respect to the requirements of the Supplier Code of Conduct and to implement a process that is communicated to their personnel to support raising any concerns or reporting violations of ethics, policy or law, without fear of retaliation. The Supplier Code of Conduct also encourages prompt reporting of violation by providing a list of contact information to report a violation, including a 24 hours a day, 7 days a week confidential hotline number.

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