

Third Party Code of Conduct

Introduction

ViewRay, Inc. and its subsidiaries (“ViewRay,” “we” or “our”) is committed to corporate integrity, responsible product sourcing, and the safety and wellbeing of workers across our global supply chain. ViewRay views our consultants, vendors, suppliers, and agents (collectively “Third Parties”) as an integral part of the overall success of ViewRay. We want to work with Third Parties who have strong management systems in place, are transparent in their practices and manage their own supply chain. As such, this Third Party Code of Conduct (hereinafter referred to as the “Code”) is developed to clearly outline our expectations for all of our Third Parties.

ViewRay expects its Third Parties to comply with this Code in all markets and jurisdictions where the Third Party is carrying out its business activities. We may periodically evaluate a Third Party’s compliance with these standards to determine whether to continue the business relationship with such Third Party.

In addition to any restrictions on the use of subcontractors that are otherwise agreed to between a Third Party and ViewRay, a Third Party will not use any subcontractor in connection with any ViewRay business unless the subcontractor has received a copy of this Code.

General Requirements

Legal compliance

Third Parties shall comply with all applicable laws, rules and regulations in the countries where they carry out business activities and comply with this Code even if it stipulates a higher standard than required by national laws or regulations. To the extent the International Labour Organization’s core conventions, the Universal Declaration of Human Rights or the United Nations Guiding Principles for Business and Human Rights provide for higher standards, a Third Party is expected to meet those standards. By communicating these standards to Third Parties, ViewRay is not conferring any rights or remedies to any third parties.

Management systems

Third Parties should have adequate management systems and controls in place to ensure compliance with, mitigate risks identified in, and facilitate continuous improvement with respect to this Code or agreed equivalent standards. The function and quality of the Third Party’s management system should be in proportion to the size, complexity and risk environment of its business. Third Parties shall secure and monitor their suppliers and subcontractors to ensure compliance with this Code or, where applicable, their own equivalent code of conduct. On request, a Third Party shall inform ViewRay which subcontractors a Third Party uses and demonstrate that such subcontractor had received and understood the provisions in the Code.

Product safety

In accordance with ViewRay’s Quality Management System Manual (GP01-00), ViewRay strives to continually improve the audit and inspection process of its supply chain to assure the safety and quality of its products. Material safety data sheets containing all necessary safety-relevant information will be made available by Third Parties for all hazardous substances and will be provided to ViewRay and other parties in case of legitimate need.

ViewRay's Quality Policy provides a framework for establishing and reviewing quality objectives and is reviewed for continuing applicability and suitability. The ViewRay Quality Policy is as follows:

We make medical products that we would be proud to have used on our loved ones.

Management at ViewRay is committed to complying with the requirements of the risk-based quality system and ensuring its effectiveness in compliance with applicable worldwide regulations. We will periodically review and commit to this quality policy by:

- *Ensuring it is consistent with our mission*
- *Measuring customer delight*
- *Communicating it to our teammates*

Commitment to continuous improvement

ViewRay recognizes that Third Parties will be at different stages of maturity and commits to working with Third Parties to achieve continuous improvement.

If ViewRay finds that a Third Party is not meeting the requirements and expectations set out in this Code, ViewRay may offer guidance specifying which issues need to be corrected or improved. The Third Party shall then take corrective actions promptly and commit to showing progress.

Human Rights and Labor Rights

ViewRay Third Parties shall respect internationally proclaimed human rights policies both in the workplace and more broadly in all their business activities.

Third Parties shall take measures to avoid causing, contributing or being linked to negative human rights impacts.

Child labor and authorized minors

Third Parties shall not use child labor. A Third Party must comply with all applicable laws regarding minimum employment age. For authorized minors, Third Parties are responsible for providing age-appropriate working conditions, hours of work and wage, in compliance with applicable local law.

Forced labor and human trafficking

Third Parties shall not participate in, or benefit from, any form of forced labor, including bonded labor, involuntary prison labor, slavery, servitude, trafficking or work performed under the menace of a penalty or coercion. Third Parties shall not require monetary deposits or retain identity papers or work permits as a condition of work. All work, including overtime work, shall be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice.

Health and safety of workplace

Third Parties shall provide all workers a safe and healthy working environment that complies with all legal and regulatory requirements. Third Parties are expected to have a worker health and safety program addressing

physical, chemical and biological hazards in the workplace. A Third Party should take appropriate action to prevent and manage potential workplace accidents and illnesses.

Non-discrimination

Third Parties shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, color, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability or any other characteristic other than the worker's ability to perform the job. ViewRay expects Third Parties to share its commitment to equal opportunity in employment and its commitment to employee diversity.

Fair Treatment

Third Parties shall treat workers with respect and dignity. Third Parties shall ensure that no worker is subject physical, sexual, psychological or verbal harassment, intimidation or abuse.

Working hours, wages and benefits

Third Parties must comply with all applicable laws and regulations related to wages and work hours and must provide all legally mandated benefits. Third Parties will not require its teammates to work more hours than permitted under applicable laws. Third Parties must ensure overtime is voluntary and paid in accordance with local and national laws or regulations. Wages and benefits must be paid/provided in a timely manner.

Freedom of association and collective bargaining

Third Parties shall respect, and shall not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

Material Compliance and Conflict Minerals

Third Parties are expected to exercise due diligence to make a reliable determination of the origin and source of materials in products, parts or components supplied to ViewRay and ensure that the sourcing does not directly or indirectly contribute to human right abuses and/or environmental damage in conflict-affected and high-risk areas.

Minerals and metals of special concern are tin, tantalum, tungsten, gold and cobalt, but other minerals and metals may also be applicable. ViewRay refers to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas for the definition of conflict-affected and high-risk-areas.

Business Ethics

Third Parties are expected to conduct business in compliance with all applicable national, state, local and international laws, regulations, and ordinances and adhere to internationally agreed standards of business ethics.

Anti-corruption

Third Parties shall not engage in or tolerate any form of corruption, bribery, extortion or embezzlement and are required to comply with all anti-corruption laws and regulations of the countries in which they operated, including the U.S. Foreign Corrupt Practices Act. Third Parties must not offer or accept any benefits or other means to obtain any undue or improper advantage.

Conflict of interest

Third Parties shall avoid conflicts of interest that may compromise the Third Party's credibility or other exterior parties' confidence in ViewRay. A conflict of interest is a situation where a Third Party has a private personal loyalty or activity that might conflict with ViewRay's interests, or might appear to do so; or when a Third Party is in a position to improperly use their relationship with ViewRay for their own personal benefit. Third Parties shall disclose to ViewRay whenever a situation arises in which there appears to be a conflict of interest involving or affecting ViewRay.

Privacy and intellectual property

Third Parties shall respect ViewRay's confidential information and intellectual property rights and protect ViewRay's information by safeguarding it against misuse, theft, fraud or improper disclosure.

Trade compliance

Third Parties shall comply with applicable export, import and trade compliance laws and regulations in the U.S. and all other countries in which ViewRay does business. Third Parties may not undertake any activity, or cause or require ViewRay to undertake any activity, that could result in ViewRay violating any of the abovementioned export control and/or sanction laws and regulations.

Environmental Protection

Third Parties shall operate in full compliance with all applicable environmental laws and regulations. Third Parties are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible, and to promote activities that reuse and recycle. Third Parties shall have a management system in place aimed to continuously improve the Third Party's environmental standards and performance. Third Parties shall identify and address any environmental compliance issues, including resource consumption, emissions, chemicals, spills and waste.

Monitoring and Compliance

A Third Party is responsible for regular and documented monitoring and review of its compliance with this Code. A Third Party is also responsible for maintaining adequate documentation to demonstrate compliance by its subcontractors.

While Third Parties are expected to self-monitor and demonstrate their compliance with this Code, a Third Party must permit ViewRay and its designated agents (including third parties) to perform audits to review a Third



Party's compliance with this Code. ViewRay has no obligation to conduct inspections or review a Third Party's compliance with this Code and assumes no liability or responsibility for the actions or omissions of a Third Party.

In case deviations from this Code and/or applicable laws are found, the Third Party shall take corrective actions in cooperation with ViewRay. Failure to cooperate, repeated and severe violations of this Code and/or applicable laws may result in ViewRay reducing or terminating its business with such Third Party.

A Third Party must self-report to ViewRay upon learning of any known or suspected improper behavior in violation of this Code by calling **1-855-831-6237** or in writing to **VRAY@openboard.info**.