

Human Rights & Labor Policy

Scope

This policy applies to all of the operations of ViewRay Incorporated and its direct and indirect subsidiaries (together, “ViewRay”), regardless of geographic location. We expect our suppliers, vendors and business partners to uphold these principles and urge them to adopt similar policies within their own businesses. Furthermore, ViewRay’s Supplier Code of Conduct sets forth our expectations of our suppliers regarding business ethics.

Respect for Human Rights

ViewRay aims to be a positive social presence in every community where we work. We strive to promote human rights in our relationships with our teammates, suppliers, vendors and business partners. To this end we support and promote the principles of the United Nations’ Universal Declaration of Human Rights and the human rights protections set forth in the laws of the United States and the states and communities in which we operate. We will endeavor to assess implications to human rights of major business decisions and seek dialogue with stakeholders in the communities in which we operate.

Diversity & Inclusion

We value and advance the diversity and inclusion of the people with whom we work. ViewRay’s workplace policies and practices include commitments to equal opportunity in workplaces that are free from discrimination or harassment on the basis of race, color, religion, national origin, gender, gender identity, sexual orientation, marital or pregnancy status, age, disability, veteran status or other characteristics protected by law. These policies are outlined in our Code of Business Conduct and Ethics. ViewRay provides its Code of Business Conduct and Ethics to its teammates and periodically provides training to teammates on topics covered in the Code of Business of Conduct and Ethics.

Freedom of Association

We strive to create workplaces in which open and honest communications among all teammates are valued. We fully support the principles of the International Labour Organization’s fundamental conventions with respect our teammates’ right to form, join or not join, labor unions, without fear of reprisal, intimidation or harassment. In the case of teammates represented by a legally recognized union, we are committed to bargaining in good faith with that union. Furthermore, we expect the same commitment from suppliers as outlined in our Third Party Code of Conduct.

Health and Safety

ViewRay is committed to the protection of human health, safety and the environment in all of the global communities and facilities where we conduct our business. ViewRay is also committed to conducting our business in compliance with all applicable environmental and workplace health and safety laws and regulations. ViewRay strives to provide a safe and healthy work environment for our teammates and to avoid adverse impact and injury to the environment and communities in which we conduct our business. Achieving this goal is the responsibility of all of ViewRay’s officers, directors and teammates worldwide. Furthermore, ViewRay’s Third

Party Code of Conduct sets forth our expectations of our suppliers regarding the health and safety of their workplace.

Workplace Security

We are committed to safe and healthy working conditions that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. We conduct our security operations in alignment with national legal requirements and international standards. We strive to train our security people employed to protect our property in using power to an extent matching the threats they may be facing, without infringing the freedom and safety of others. We strive to ensure that private security personnel do not interfere with peaceful demonstrations or other democratic processes in civil society.

Forced Labor and Human Trafficking

We prohibit the use of all forms of forced labor, including bonded labor, involuntary prison labor, indentured labor, modern forms of slavery, servitude, human trafficking or work performed under the menace of a penalty or coercion. We are committed to evaluating the potential for forced labor and human trafficking in our supply chain and minimizing 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. We have a no tolerance policy for teammates, suppliers, vendors and business partners in violation of our company standards regarding slavery and human trafficking and anyone in violation of those standards is subject to termination.

Furthermore, although everyone's human rights and fundamental freedoms must be respected and upheld, in particular, we strive to promote, protect and help ensure the equal enjoyment of human rights of vulnerable groups, minorities, women, or those whose circumstances open them up to exploitation or the abuse of their rights

Child Labor

We are committed to complying with all local minimum working age laws and requirements and prohibit the use of child labor.

Work Hours, Wages and Benefits

We compensate our teammates competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements and applicable legal standards. We work to ensure full compliance with applicable wage, work hours, overtime and benefits and other labor laws. We are committed to paying living wages under humane conditions.

Right to Water

We recognize the right to water as a fundamental human right. We respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation.

Monitoring

While suppliers are expected to self-monitor and demonstrate their compliance with this policy, ViewRay and its designated agents (including third parties) may also monitor suppliers' compliance with this policy and initiate dialog to achieve improvements.

Compliance, Training and Reporting for Teammates

This policy will be communicated to all teammates and will be available publicly. All teammates are required to complete yearly training on ViewRay's Code of Business Conduct, which references this policy.

You should not accept any direction by your supervisor which is inconsistent with this policy. If you are ever concerned that anyone connected with us may have engaged or is about to engage in any conduct in violation of this policy, you should promptly bring the matter to the attention to a member of the leadership, the human resources team, legal and compliance or anonymously through the ViewRay Company Hotline by calling **1-855-831-6237** or in writing to **VRAY@openboard.info**. An anonymous report should provide enough information about the incident or situation to allow ViewRay to investigate properly.

We may waive the application of the policies set forth in this policy where circumstances warrant granting a waiver, subject to appropriate terms and conditions. This policy is not intended to, and does not, grant any rights to any director, officer, employee, tenant, supplier, competitor, stockholder or any other person or entity.