

## Varian Medical Systems UK Limited (the 'company')

### *Slavery and Human Trafficking Statement*

The company is a wholly owned subsidiary of a quoted US corporation, manufacturing some of the group's products at its factory in Crawley, West Sussex and acting as the sole distributor of the group's products and services in the UK and Ireland.

#### Our business

The UK business comprises three main functions, Sales, Service and Manufacturing. As our sales are almost exclusively group products, the supply chains for both the Sales and the Manufacturing business are intrinsically linked, frequently using common suppliers, so we consider these two functions as one in terms of our Modern Slavery Act compliance. As a result of our attempts to minimise our product costs and reduce our exposure to any one currency, our supply chain is widely dispersed around the world, complicating our compliance efforts. As we only use Varian group employees in our Service business, we consider this to be a low risk function for the UK company.

#### Our policies

Group policy is to foster and maintain a culture of compliance with applicable laws and the highest standards of ethics and business conduct.

Varian's Code of Conduct document outlines 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 all Varian's employees worldwide. All UK employees are, therefore, expected to comply with the Code of Conduct and are required to review the latest version, annually, such review being recorded via our internal training tool. A confidential Ethics & Financial Helpline, operated by an independent firm and available 24 hours a day, 7 days a week, is available for any employee to report any concerns they may have.

In addition, Varian expects all of the suppliers in its supply chain to comply with its Supplier Code of Conduct and all applicable laws. Varian's Supplier Code of Conduct outlines Varian's expectations for suppliers, and expressly includes provisions concerning child labour, slavery and human trafficking. Varian's suppliers are required to inform and train their employees with respect to the requirements of the Supplier Code of Conduct and to have 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 suppliers and their employees by providing a list of contact information, including a 24 hours a day, 7 days a week confidential hotline number.

#### Due diligence

Although the company endeavours to have written agreements with all of its suppliers, requiring them to comply with our Supplier Code of Conduct and all 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.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement for the current financial period. It is being published as part of the annual report and financial statements because the company does not have its own external web-site.



**Per Persson**

Director

3<sup>rd</sup> December 2018