



## STATEMENT ON HEDGING BY DIRECTORS AND EMPLOYEES

(amended effective July 1, 2014)

### I. Purpose

The purpose of this Statement on Hedging by Directors and Employees is to make available to the public (via an Investor Relations web site posting) information that describes the position of Accuray Incorporated (“Accuray”) regarding hedging activities by its directors and employees.

### II. Statement on Hedging by Directors and Employees

Accuray prohibits its directors and employees from engaging in hedging activities related to Accuray’s Common Stock. The prohibition is reflected in Accuray’s Insider Trading Policy.

Under the Insider Trading Policy, directors and employees are prohibited from engaging in any of the following activities involving Accuray securities:

- purchasing on margin or holding Accuray securities in margin accounts;
- pledging or using Accuray securities as collateral for loans;
- engaging in derivative securities or hedging transactions with respect to Accuray securities; and
- short sales of Accuray securities.

In addition, the Insider Trading Policy states that Accuray’s officers, directors and employees and their respective family members (including spouses, minor children, or any other family members living in the same household), should ordinarily not directly or indirectly participate in transactions involving trading activities which by their aggressive or speculative nature may give rise to an appearance of impropriety. Such activities would include the purchase of put or call options, or the writing of such options.