

UK Modern Slavery Act and California Transparency in Supply Chains Act Statement

2019

The United Kingdom Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010 require publication of an annual statement regarding our efforts to ensure that slavery and human trafficking are not occurring in our supply chain.

Globus Medical, Inc. ("Globus") is committed to establishing and maintaining the highest standards of ethical practice in all areas of its business. Maintaining these standards is an essential part of our effort to be recognized as the pre-eminent spine company in the world. Globus will not tolerate any instances of slavery and human trafficking in our supply chain, and has developed policies, procedures, and training designed to ensure that our business is run ethically and in compliance with relevant laws and regulations.

Globus takes numerous measures to manage its supply chain and suppliers responsibly, including:

1. Verification – Globus expects its suppliers to conduct business in compliance with all applicable laws and regulations. Globus may engage in verification measures as appropriate to evaluate and address any risk of slavery and human trafficking in our supply chain.
2. Certification – In our standard supplier contracts, Globus suppliers represent that they are in compliance with all applicable laws and regulations, which would include any laws addressing slavery and human trafficking, and covenant and agree to notify Globus immediately upon the occurrence of an event which would render such representation incorrect or misleading.
3. Audit – Globus conducts periodic audits of its suppliers. If Globus receives notice or has reason to suspect that a supplier is engaged in slavery or human trafficking in connection with any audit or otherwise, Globus will investigate, report, or take other appropriate action in accordance with applicable legal requirements and ethical standards.
4. Accountability – Globus has established a Code of Ethics to ensure our employees comply with all applicable laws, regulations, and industry guidelines. Any employee who fails to comply with the Code of Ethics shall be subject to disciplinary action up to and including termination. Globus also maintains a Compliance Hotline via both telephone and a dedicated website for individuals to report any concerns over actual or suspected illegal or unethical conduct. All such reports are thoroughly and promptly investigated.
5. Training – All Globus employees receive annual training on the Globus Code of Ethics and Compliance Hotline, which requires all employees to reaffirm their commitments to comply with all applicable laws, regulations, and industry guidelines, and to report any concerns over actual or suspected illegal or unethical conduct.

By:



David C. Paul
Director

Date:

2/27/20