

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



Globus Medical Anti-Slavery Policy

Globus Medical, Inc. (“Globus”) is committed to establishing and maintaining the highest standards of ethical practice in all areas of its business. In accordance with this commitment, Globus has developed policies, procedures, and training designed to ensure that our business is run ethically and in compliance with relevant laws and regulations.

1.0 Purpose and Scope

This policy addresses measures Globus takes to ensure that modern slavery is not occurring in our business and within our supply chains.

2.0 Responsibility

While all Globus employees are responsible for compliance with this policy, Globus’s legal department has overall responsibility for implementing this policy, monitoring its effectiveness, responding to any queries, and ensuring this policy complies with our legal and ethical obligations.

3.0 Definition of Modern Slavery

Modern slavery is defined as the recruitment, movement, harboring or receiving of individuals through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation. It takes various forms, including slavery, servitude, forced or compulsory labor, and human trafficking. Modern slavery is a crime and a violation of fundamental human rights, and is not tolerated in any form by Globus. If a Globus employee has any questions over whether a particular circumstance constitutes modern slavery, that employee must raise that question with the legal department or submit it through the Compliance Hotline for evaluation.

4.0 Policy

Globus expects each and every employee to cooperate and comply with the company’s zero-tolerance approach to modern slavery, remain vigilant in identifying circumstances where modern slavery might be occurring, report any such circumstances to senior management in full and without delay (or alternatively report any such circumstances to the Compliance Hotline at www.globusmedical.ethicspoint.com), and avoid any activity that might violate or suggest a violation of this policy. Any reports regarding actual or possible violations of this policy will be investigated immediately and thoroughly.

Globus further expects all of its third party supply chain and any individual or company working for us or on our behalf in any capacity to follow this policy. In our standard supplier contracts, Globus suppliers represent that they conduct business in compliance with all applicable laws and

regulations, which would include any laws addressing slavery and human trafficking. In those contracts, our suppliers also covenant and agree to notify Globus immediately upon the occurrence of an event that would render such representation incorrect or misleading. Globus will communicate this policy to its suppliers at the outset of the business relationship and may engage in verification measures as appropriate to evaluate and address any risk of modern slavery in our supply chain.

5.0 Compliance

Any party to whom this policy applies will be expected to cooperate fully with any investigation into suspected breaches of this policy or any matters related to this policy. Any employee violating this policy will be subject to disciplinary action up to and including termination. Globus may terminate its business relationship with any third party who breaches this policy.

Retaliation of any kind or discrimination against an employee who makes a report consistent with this policy is prohibited. Any such retaliation or discrimination will be subject to discipline up to and including termination.

This policy does not form part of any employment contract between Globus and any other party. Globus may amend this policy at any time.

Last revised: November 25, 2020