

CALIFORNIA SUPPLIER TRANSPARENCY ACT DISCLOSURE

Alphatec Spine, Inc. is an international provider of medical products that improve lives by delivering advancements in spinal fusion technologies. Our commitment to improving lives is something that we take seriously not just in the delivery of our products, but also in our labor practices and those of our suppliers. In addition to our compliance with U.S and international laws regarding forced labor, we also comply with the California Transparency in Supply Chains Act of 2010 (SB 657), which requires manufacturers and retailers in California to disclose their efforts to track human trafficking and forced labor in their supply chains in order to enable consumers to make informed choices regarding the products they buy and companies choose to support. The information below relates to our obligations under the law.

Alphatec Spine and its affiliated companies predominantly operate in the United States. Other than a limited volume of products manufactured by our European suppliers or materials that we acquire in Europe, our products are manufactured in the United States. In all cases, our supply chain seeks to comply with all laws regarding human trafficking and slavery. We have a no tolerance policy for violations of such laws related to labor practices.

As part of our Global Code of Business Conduct, we encourage all employees, contractors and suppliers to seek guidance on legal and ethical questions and to report actual or suspected illegal activities to an Alphatec Spine supervisor or our Chief Compliance Officer. Disregard or deliberate ignorance of the law is not acceptable and will not be tolerated. We promptly and thoroughly investigate all such allegations. If the results of an investigation indicate that corrective action is required, the relevant party or parties will be held accountable and we will decide the appropriate steps to take including without limitation imposing disciplinary action up to and including dismissal, termination of contractual relations, reporting violations to the appropriate authorities and/or the initiation of private legal proceedings.

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