

## UK MODERN SLAVERY ACT AND CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT STATEMENT

The UK Modern Slavery Act 2015 and the California Transparency in Supply Chains Act 2010 require the publication of an annual statement describing our efforts to ensure that slavery and human trafficking are not occurring within our supply chains. This Statement covers the fiscal year ended December 31, 2025.

Alphatec Holdings, Inc, through its wholly owned subsidiaries, Alphatec Spine, Inc., EOS imaging S.A.S. and SafeOp Surgical, Inc. (collectively, “ATEC” or the “Company”), is an international medical technology company, headquartered in Carlsbad, California, focused on the design, development, and advancement of technology for better surgical treatment of spine disorders. By applying our unique, 100% spine focus and deep industry know-how, we aim to revolutionize spine surgery through clinical distinction. The sophisticated approaches that we create from the ground up integrate with our expanding InformatiX™ platform to objectively inform surgery and achieve the goals of spine surgery more predictably and more reproducibly. We have a comprehensive product portfolio designed to address the spine’s various pathologies and we are perpetually innovating to accomplish our vision to be the standard bearer in spine.

ATEC does not endorse any form of modern slavery or human trafficking. We are committed to responsibly managing our operations and supply chain to help prevent these practices. This commitment extends to third parties—including vendors and suppliers—who act on our behalf or for our benefit.

ATEC takes several steps to manage its supply chain responsibly, including:

**Verification** — ATEC has established a Global Code of Business Conduct (the “Code”), which requires compliance with legal, ethical, and behavioral standards. The Code requires our suppliers to conduct business in compliance with all applicable laws and regulations and to refrain from engaging in forced, indentured, slave, or child labor, or treating employees harshly or inhumanely. ATEC may implement verification measures, as appropriate, to evaluate and address the risk of such practices within our supply chains.

**Certifications** — ATEC’s standard supplier contracts require suppliers to represent and certify that they are in compliance with all applicable federal, state, local, and foreign laws, which include anti-slavery and anti-human-trafficking laws, and to notify ATEC immediately of any event that would render such representations inaccurate or misleading.

**Due Diligence Review** — ATEC reserves the right to conduct reasonable and periodic due diligence to ensure that its suppliers adhere to the Code and comply with applicable laws and regulations in the countries in which we operate. ATEC may also implement a risk-based approach to supplier audits to evaluate compliance with prohibitions against slavery and human trafficking.

If ATEC suspects or receives notice that a supplier is involved in such activities, we will conduct an inquiry or, if warranted, a third-party audit and take appropriate action as required by law.

***Accountability*** — As part of our Code, we encourage all employees and suppliers to seek guidance on legal and ethical questions and to report actual or suspected violations of law to an ATEC supervisor, the Company’s Chief Compliance Officer, or through the Company’s Compliance Hotline. All reports of alleged violations will be investigated promptly and appropriately. Deliberate ignorance or disregard of the law is unacceptable and will not be tolerated. If an investigation determines that corrective action is required, the relevant parties will be held accountable, and ATEC will determine appropriate remedial measures, which may include disciplinary action up to and including dismissal, termination of contractual relationships, reporting violations to appropriate authorities, and/or initiation of legal proceedings.

***Training*** — All ATEC employees receive training on the Code. Employees with direct responsibility for supplier management receive additional training related to this Statement and supply chain compliance. This Statement and the Code are published on the Company’s website. ATEC strives to continuously improve its programs and practices to ensure compliance with applicable laws and the Company’s ethical standards.

A handwritten signature in black ink, appearing to read 'Pat Miles', with a stylized, wavy tail.

Pat Miles  
Chairman and Chief Executive Officer