

ALPHATEC SPINE, INC.
CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

Alphatec Holdings, Inc. (together with its subsidiaries and affiliates, including Alphatec Spine, Inc., collectively referred to as the "Company") requires legal and ethical behavior from all of its employees at all times. This Code of Ethics for Senior Financial Officers (the "Code of Ethics") has been adopted by the Company's Board of Directors in accordance with Section 406 of the Sarbanes Oxley Act of 2002 and the related rules of the Securities and Exchange Commission (the "SEC"). "Senior Financial Officer" means the Chief Executive Officer, the Chief Financial Officer, the Principal Accounting Officer or Controller, and persons performing similar functions.

This Code of Ethics contains standards for Senior Financial Officers reasonably necessary to promote honest and ethical conduct, including: (i) the ethical handling of actual or apparent conflicts of interest; (ii) full, fair, accurate, timely and understandable disclosure of information in the Company's periodic SEC reports and in other public communications, and (iii) compliance with applicable governmental laws, rules and regulations. It should be read in conjunction with the Company's Global Code of Business Conduct.

Pursuant to this Code of Ethics, Senior Financial Officers must:

- act with honesty and integrity, avoiding actual or apparent conflicts of interest;
- report to the Chairman of the Audit Committee any transaction that reasonably could be expected to give rise to a conflict of interest;
- produce (or cause to be produced) full, fair, accurate, timely and understandable disclosure of information in reports and documents that the Company files with the SEC and in other public communications;
- ensure that all of the Company's books, records, accounts and financial statements are maintained in reasonable detail, accurately reflect transactions involving the Company, and comply with applicable legal requirements as well as the Company's internal control systems;
- ensure that reimbursements accurately reflect the nature and amount of the expenses incurred;
- comply with applicable governmental laws, rules and regulations, and
- promptly report any violation of this Code of Ethics to the Chairman of the Audit Committee.

Senior Financial Officers will be held accountable for adherence to this Code of Ethics. Failure to comply may result in disciplinary action, up to and including termination of employment. Any request for a waiver of any provision of this Code of Ethics must be in writing and addressed to the Chairman of the Audit Committee. The Company's Board of Directors will have the sole and absolute authority to grant any such waiver. All waivers from this Code of Ethics will be disclosed promptly on a Form 8-K or via any other means approved by the SEC.

I hereby certify that I have read and understand this Code of Ethics, and I agree to comply with it.

By: _____

Name: _____

Title: _____

Date: _____