



Labour Standards Assurance System Policy

NuVasive UK Ltd. (“NuVasive”) is a manufacturer and supplier of spinal implants, spinal disposables, and neuromonitoring devices to healthcare providers in the United Kingdom.

Scope and Purpose of Policy

NuVasive is committed to conducting all of its business in an honest and ethical manner, and as part of this commitment, NuVasive acknowledges its obligations towards its customers, employees and the communities in which it conducts business. In relation to our labour standards, this Policy is meant to provide clarity to our employees, customers, suppliers, investors, and other stakeholders on our commitments to and approach to respecting human rights and labour standards through our direct operations and supply chain. This is consistent with our disclosure obligations under all applicable laws, including but not limited to, the Modern Slavery Act 2015.

This Policy applies to the organization and its suppliers relative to implants available within the NHS supply chain.

Corporate and Social Responsibility

NuVasive is committed to improving the lives of our employees, customers and the communities in which we live and work. We prioritize environmental, social and governance matters and have focused our corporate social responsibility around three key pillars – community & philanthropy, diversity & inclusion, and environmental sustainability.

Aims

- Continually improve and monitor corporate and social responsibility performance;
- Increase employee awareness and training on labour standards and anti-corruption;
- Partner with customers and suppliers in an open and honest way;
- Timely, fairly and independently manage complaints made in good faith, in a thorough, independent and analytical manner.

Anti-Bribery and Anti-Corruption

NuVasive is committed to complying with all anti-bribery and applicable anti-corruption laws in our business dealings and has a zero-tolerance policy for acts of corruption or bribery. This includes complying with all relevant UK laws regarding anti-bribery and corruption, including, but not limited to, the Bribery Act 2010, in respect of its conduct in the UK and internationally. NuVasive employees also are required to follow, at all times, NuVasive’s Anti-Bribery and Anti-Corruption Policy.

Labour Standards

NuVasive has identified the following reasons to establish a comprehensive system of minimum labour standards, which are as follows:

1. Child Labour

NuVasive does not engage in or support the use of child labour and employs no children under the age of 15. In relation to our supply chain, if national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from completing compulsory schooling or training, or if the employment would be harmful to their health or development.

2. Forced & Compulsory Labour

NuVasive has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships. To this end, the Company implements and enforces effective systems and controls to prevent modern slavery from taking place anywhere in its own business or in any of its supply chains.

NuVasive does not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.

3. Health & Safety

NuVasive is committed to maintaining a safe, secure and healthy workplace. NuVasive has implemented appropriate health and safety policies, and employees receive safety and job specific instructions and training during the course of their employment.

4. Freedom of Association

Freedom of association is respected and NuVasive will adhere to applicable UK legislation to ensure that employees are entitled to be members of trade unions or other applicable representative bodies.

5. Discrimination

NuVasive is committed to providing a work environment where individuals are treated in a professional and respectful manner free from bias, prejudice, harassment and unprofessional behavior. NuVasive has an Equal Employment Opportunities Policy, which is shown to all new employees and is available on NuVasive's intranet.

6. Disciplinary Practices

NuVasive is committed to addressing all disciplinary matters fairly, and to undertake steps to establish the facts and provide employees with the opportunity to respond before taking any formal action.

7. Working Hours

NuVasive is committed to complying with applicable laws and industry standards on working hours and holiday entitlements.

8. Remuneration

NuVasive is committed to complying with applicable national laws and regulations with regard to wages and benefits.

9. Right to Work in the UK

NuVasive verifies that all employees have the legal right to be employed in the UK.

10. Employment Relationship

All work-related activities are carried out based on a recognized employment relationship established according to national law and practice.

NuVasive provides all employees with written information about their terms and conditions of employment, including details regarding wages before they enter employment.

Supplier Due Diligence

NuVasive undertakes due diligence on any prospective new suppliers, distributors, contractors and partners to verify that they meet the minimum requirements as set out in this Policy. NuVasive's commitment to ethical conduct and responsible business practices extends to all suppliers, who act on our behalf or for our benefit, regardless to where they are located worldwide.

NuVasive has implemented adequate procedures to manage actual and potential non-compliance with this Policy.

Emergency / Critical Issue Response

Suppliers shall not engage in any form of behavior which is contrary to this Policy, e.g. forced, indentured, slave or child labour nor should they treat employees harshly or inhumanely. We are committed to preventing these practices and if any violation or critical issue arises, either due to an employee or supplier, it will be taken seriously and will be investigated. Violations can

result in disciplinary action that may include informal counseling, re-training, termination or reporting of criminal activity, when applicable. NuVasive's business continuity efforts reduce the risk of any supply chain disruption, in the event of a contract termination with immediate effect.

NuVasive is also committed to:

- Compliance with all legal duties in respect of labour standards;
- Continuous improvement with regard to recognized industry standards including, but not limited to, NHS Supply Chain standards, The Ethical Trading Initiative Base Code and The International Labour Organization standards;
- Promoting awareness of this Policy to all relevant suppliers;
- Making available sufficient resources for the implementation of this Policy;
- Reviewing this Policy periodically to maintain its effectiveness in carrying out its purpose and communicate any amendments to all relevant individuals and entities who must follow this Policy.

Roles and Responsibility

The NuVasive UK Ltd. board of directors has overall responsibility for ensuring this Policy complies with NuVasive's legal and ethical obligations, and that all those under its control comply with it.

The Chief Risk & Compliance Officer is responsible for overseeing the implementation of this Policy, monitoring its use and effectiveness, dealing with any queries about it, and directing audits of internal control systems and procedures to ensure they are effective.

LSAS Management at all levels are responsible for establishing and maintaining policies, processes and procedures to comply with this Policy and to provide adequate and regular training on it and the issue of labour standards in supply chains.

NuVasive maintains records in relation to the matters set out in this Policy in accordance with the requirements of applicable law.