



**California Transparency in Supply Chains Act Declaration
and
UK Modern Slavery Act Statement**

The California Transparency in Supply Chains Act of 2010 and the United Kingdom Modern Slavery Act of 2015 require public disclosures of our efforts to eradicate slavery and human trafficking from our supply chains. This provides consumers with additional information that will allow them to make more informed decisions about the goods they purchase.

NuVasive's guiding principles are: Integrity, Leadership, Accountability, and Clarity. We are committed to ethical and lawful behavior. We also expect our suppliers to follow our guiding principles and behave ethically and lawfully when acting on our behalf or for our benefit. We support and respect the protection of human rights and are committed to preventing slavery and human trafficking in our operations and supply chains.

NuVasive is taking the following steps to manage our supply chains responsibly:

- **Verification.** NuVasive's risk management team is developing a risk assessment process to identify, evaluate, and address the risk of human trafficking and slavery in our supply chains.
- **Audit.** Based on the results of our risk assessment, NuVasive's risk management team will develop a process to audit suppliers as appropriate.
- **Certification.** NuVasive requires all direct suppliers to agree to our purchase order terms and conditions. These terms and conditions require our suppliers to comply with all applicable laws regarding human trafficking, slavery, forced labor, and/or child labor.
- **Internal Accountability.** NuVasive's Code of Ethical Business Conduct (the Code) requires that our suppliers shall not engage in any form of forced, indentured, or child labor. The Code also requires our employees to comply with laws regarding wages and working hours in the countries in which we work and do business. Violations of the Code are taken seriously and will be investigated. Violations can result in disciplinary action including termination and reporting of criminal activity where applicable.
- **Training.** NuVasive's compliance team provides employees with training regarding mitigating the risk of human trafficking and slavery in our supply chains. Additionally, NuVasive's compliance team provides employees who are directly responsible for supply chain management with advice and support as needed.

Fiscal Year 2018



James Garrett
Chief Risk and Compliance Officer