

Entity:	NuVasive, Inc.	
Title:	Conflict Minerals in Supply Chains	
Document Number:	COP-NUV-PRO0001	
Revision:	A	
Document Tier:	II	
Reviewed Date:	11OCT2018	
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1.0 PURPOSE

- This Policy is to ensure that the Company complies with U.S. law regarding conflict minerals in Company's supply chains.

2.0 SCOPE

- The Policy will apply to all Company products manufactured by, or contracted to manufacture by Company anywhere in the world, which will include all products that contain those potential conflict minerals that are necessary to the functionality or production of the product.

3.0 DEFINITIONS

- See the Corporate Definitions Document for all capitalized terms.

4.0 RESPONSIBILITIES

- The senior most executive in the Procurement Department is responsible for the interpretation of this Policy.

5.0 POLICY

5.1 Conflict Minerals

- On August 22, 2012, the final rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Dodd-Frank Act) was approved by the U.S. Securities and Exchange Commission ("SEC"). The rule imposes reporting requirements on publicly traded companies subject to the SEC to report annually the presence of conflict minerals originating in the Democratic Republic of the Congo or adjoining countries in the products they manufacture or contract to manufacture whereby the conflict minerals are necessary to the functionality or production of a product. Conflict minerals under the Act are specifically identified as tantalum, tin, gold or tungsten.

5.2 Company Commitments

- 5.2.1** The Company is committed to taking all steps to comply with the Dodd-Frank Act and implementing appropriate due diligence processes to meet its obligations.

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5.2..2 The Company is committed to sourcing components and materials from suppliers that share its values around human rights, ethics and environmental responsibility.

5.3 Supplier Obligations

5.3..1 The Company expects its suppliers to commit to processes designed to ensure the responsible sourcing of minerals and to have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture are conflict free.

5.3..2 The Company expects suppliers to establish their own due diligence program to achieve conflict-free supply chains.

5.3..3 In the event Company determines a supplier to not be conflict free, the Company will expect the supplier to remediate such matters or consider using alternative suppliers.

5.4 Due Diligence

- To ensure compliance with the applicable laws under the Dodd-Frank Act and put in appropriate due diligence the Company will:

5.4..1 Require that all of its suppliers who provide products or components to Company that contain conflict minerals to complete annual surveys regarding the country of origin of any conflict minerals contained in such products or components.

5.4..2 Require that all suppliers agree to cooperate with Company in connection with any due diligence that Company chooses to perform with respect to country of origin inquiries.

5.4..3 Require a supplier, when Company deems it necessary, to provide reasonable proof of the due diligence performed by the supplier to support the country of origin certification provided by the supplier to Company.

6.0 REFERENCES

- Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act

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7.0 ATTACHMENTS

- N/A

8.0 REVISION HISTORY

Revision	Effective Date	Change Notice Number
A	11OCT2018	CO-525

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