

GLOBUS MEDICAL INC  
Form SD  
May 30, 2018

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

FORM SD

SPECIALIZED DISCLOSURE REPORT

GLOBUS MEDICAL, INC.  
(Exact name of registrant as specified in charter)

DELAWARE                      001-35621      04-3744954  
(State or other jurisdiction   (Commission   (IRS Employer  
of incorporation)              File Number)   Identification No.)  
2560 GENERAL ARMISTEAD AVENUE, AUDUBON, PA 19403  
(Address of principal executive offices) (Zip Code)  
(610) 930-1800  
(Registrant's telephone number, including area code)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017.

Section 1 - Conflict Mineral Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Dodd-Frank Act”) defines “Conflict Minerals” as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives tantalum, tin and tungsten. In 2017, Globus Medical sold certain medical devices that contained Conflict Minerals. In accordance with the rules promulgated pursuant to the Dodd-Frank Act, we conducted a reasonable country of origin inquiry with respect to those Conflict Minerals that were contained in the medical devices that we sold in 2017 and were not outside of the supply chain prior to January 31, 2013. Third party suppliers primarily manufactured those medical devices for us. During 2017, we also manufactured a significant portion of our implant products at our facility in Eagleville, Pennsylvania. As part of our inquiry, we asked all third party suppliers of our medical devices containing Conflict Minerals to identify the source of those Conflict Minerals. We also performed the same inquiry of our raw materials vendors for our in-house manufactured products containing Conflict Minerals. This information included the name of the smelter that processed the Conflict Minerals that were not outside of the supply chain prior to January 31, 2013. Our inquiries noted that each of these smelters is on the RMAP Conformant Smelters and Refiners list maintained by the Responsible Business Alliance (RBA).

Conclusion

Based on our reasonable country of origin inquiry, we have no reason to believe that any Conflict Minerals contained in medical devices manufactured for us in 2017 originated in the Democratic Republic of the Congo or an adjoining country.

This Conflict Minerals Disclosure is also available on our website at <http://www.globusmedical.com/investors/conflict-minerals-disclosure/>.

Item 1.02 Exhibit

Not required.

Section 2 - Exhibits

Item 2.01 Exhibits

None.

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SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the Registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

GLOBUS MEDICAL, INC.  
(Registrant)

Dated: May 30, 2018 /s/ DANIEL T. SCAVILLA

Daniel T. Scavilla  
Senior Vice President,  
Chief Financial Officer