

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

October 4, 2024

Daniel T. Scavilla President and Chief Executive Officer Globus Medical Inc. 2560 General Armistead Avenue Audubon, Pennsylvania 19403-5214

> Re: Globus Medical Inc. Form 10-K for Fiscal Year Ended December 31, 2023 File No. 001-35621

Dear Daniel T. Scavilla:

We have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance Office of Industrial Applications and Services