



Health innovation that matters

## **2019 Modern Slavery and Human Trafficking Statement**

LivaNova PLC and its subsidiaries (individually or collectively, "LivaNova"), are committed to the highest ethical standards and compliance with laws and regulations applicable to our business, including laws related to slavery and human trafficking.

This statement sets out LivaNova's commitment towards these efforts for the fiscal year ending 31 December 2019.

As part of our initiative to identify and mitigate risks, LivaNova has taken the following steps and is continuously working to further improve our policies and practices to ensure materials and services provided to LivaNova are procured only from suppliers who share this same level of commitment.

### **Policies and Internal Accountability**

At LivaNova, we unite to provide hope for patients and their families through innovative medical technologies, delivering life-changing improvements for both the Head and Heart. This is our mission which we introduced in 2019.

We can only uphold this with the trust and respect of not only physicians and patients but of our employees, the communities in which we work, shareholders, partners, customers and suppliers.

That trust and respect comes with us meeting the highest standards of business ethics and compliance. It is not only what we do but how we do it. This includes laws related to slavery and human trafficking.

LivaNova supports the goals of the California Transparency in Supply Chains Act of 2010 and the United Kingdom Modern Slavery Act of 2015 and is committed to eradicating slavery and human trafficking from our business activities and supply chains.

In 2019, we began updating our Code of Business Conduct and Ethics to make it simpler, easier to read and give clear guidance on key expectations including human rights and modern slavery. The new code was launched in ten languages in early 2020 representing the key languages spoken across LivaNova.

To help employees make the best decisions, we also introduced a set of values as follows:

- **Patients First.** Our shared purpose is to improve the lives of patients
- **Meaningful Innovation.** We develop novel products and therapies to address multiple disease states
- **Act with Agility.** We challenge ourselves to continuously improve and act nimbly
- **Commitment to Quality and Integrity.** We dedicate ourselves to high quality and integrity in everything we do
- **Collaborative Culture.** We value diversity of thought and our collective strength as a team

The [Code of Business Conduct and Ethics](#) is available, along with [communication channels](#) for reporting violations or concerns in good-faith in the hyperlinks provided.

## Verification

LivaNova proactively promotes ethical behavior and encourages employees to report violation of laws, regulations, our Code of Ethics and Business Conduct and our policies and procedures. While we encourage employees to raise issues with their managers, we have also recently introduced a new and improved Ethics and Integrity Helpline where concerns can be reported confidentially and anonymously. All reports received are triaged to ensure timely and effective follow up. In 2019 we received no reports relating to human rights violations. In January 2020, we started a poster campaign at all sites stressing the importance of reporting issues and advertising the availability of the Ethics and Integrity Helpline.

In addition, prior to engaging with a third-party direct supplier, LivaNova evaluates direct suppliers through a risk-based business review process. Suppliers are expected to comply with applicable laws and regulations, including those related to slavery and human trafficking, as typically specified in our purchase order terms and conditions, contracts, or agreements.

Work has begun to upgrade our due diligence process to ensure we had appropriate risk assessment of third parties being engaged which includes looking at potential flags for human rights related risks. The pilot phase for the new process is ongoing

and in 2020 we expect the process to be embedded in all new vendor selection and Procurement to Pay (P2P) processes.

### **Audit/Due Diligence**

LivaNova reserves the right to verify supplier compliance with our defined requirements. We regularly audit suppliers who impact our quality system to confirm services or materials provided conform to defined requirements. Audits are performed by LivaNova or third parties contracted by LivaNova and may include site visits.

### **Certification**

LivaNova reserves the right to request immediate corrective action where noncompliance is identified, and has the right to terminate agreements with those suppliers who do not comply with our terms and conditions.

While LivaNova requires compliance with all applicable laws in terms and conditions of purchase orders and agreements, we currently do not require our suppliers to certify material and services received comply with the laws specifically related to slavery and human trafficking.

### **Training**

All LivaNova employees with regular computer access are required to commit to the new Code of Business Conduct and Ethics. Employees without regular computer access will be provided with copies of the new code.

The Code of Business Conduct and Ethics provides specific instructions on how employee's can speak up and report potential violations or concerns. These speak up methods are also readily assessable via LivaNova's intranet and company website and are also included on the Speak Up campaign posters which are on display in common areas throughout our facilities.

In addition, a monthly newsletter covering an assortment of ethics and integrity topics, including how to speak-up, human slavery, and other topics is sent to all employees having email access.



Health innovation that matters

In 2020, the Code of Business Conduct and Ethics training will include short (2 minutes) videos of business leaders talking about key components of the code. One of these videos will focus on human rights and modern slavery.

## **Looking Ahead**

Everything we do is intended to support our mission. LivaNova will continue to work to increase employee awareness of the risks around modern slavery, specifically those who are involved with sourcing and buying decisions. We will continue to work to improve our policies, programs, and procedures for how we identify and mitigate risks in our supply chains to ensure our suppliers and third party business partners are upholding the same level of commitment to compliance and business ethics as we do.

## **Damien McDonald**

Chief Executive Officer and Director

LivaNova PLC