

2018 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.

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 supply chains and business activities. We have zero tolerance to slavery and human trafficking. We expect all our suppliers and contractors to adhere to these same fundamental values.

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.

This statement sets out our commitment towards these efforts for the fiscal year ending the 31 December 2018.

Policies and Internal Accountability

LivaNova is committed to maintaining and acting within the highest standards in our industry. We understand and respect the obligation we have to our patients, their families and their caregivers to operate at the topmost level of business ethics and compliance.

LivaNova requires employees, agents, and representatives (together, “Employees”) to comply with our Code of Business Conduct and Ethics., This code mandates compliance with all laws applicable to it or the conduct of its business regardless of location. LivaNova proactively promotes ethical behavior and expects Employees to report violation of laws, rules, regulations, or our Code of Business Conduct and Ethics. LivaNova provides methods for reporting violations or concerns in good-faith, confidentially and anonymously, and fully investigates each report.



Health innovation that matters

The Code of Business Conduct and Ethics is available, along with communication channels for reporting violations or concerns in good-faith.

Verification

Prior to engaging with a third-party supplier, LivaNova evaluates 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.

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.



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Training and Awareness

Training on the Code of Business Conduct and Ethics is provided to LivaNova Employees annually. This training includes ethical decision making, the applicable laws and regulations, and the process for reporting potential compliance concerns. LivaNova's compliance program also includes written policies and procedures, monitoring and auditing, and the investigation into potential violations with the potential for disciplinary action to be taken when necessary.

Looking Ahead

At LivaNova, our mission is to develop and deliver health innovation that matters. Everything we do is intended to support our mission. LivaNova will continue to work to increase employee awareness, 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 contractors 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