

# California Transparency in Supply Chains Act and United Kingdom Modern Slavery Act

## 2022 Modern Slavery and Human Trafficking Statement

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 modern slavery and human trafficking from our business activities and supply chains. This statement sets out LivaNova's commitment towards these efforts for the fiscal year starting 1 January 2022 and ending 31 December 2022.

LivaNova is a worldwide leader in cardiovascular and neuromodulation solutions, dedicated to creating meaningful products and therapies that transform lives each and every day. With approximately 2900 employees worldwide, and operating in over 100 countries, we are committed to the highest ethical standards and compliance with laws and regulations applicable to our business, including laws related to modern slavery and human trafficking.

As part of our initiative to identify and mitigate risks relating to modern slavery, LivaNova has taken the steps described further in this statement and is continuously working to further improve our policies and practices to ensure: 1) materials and services provided to LivaNova are procured only from suppliers who share our same level of commitment, and 2) modern slavery does not exist within our own business operations.

### **POLICIES and INTERNAL ACCOUNTABILITY**

#### **Our Mission**

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. We can only uphold this mission 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, and this includes taking steps to ensure that we comply, in all aspects, with laws related to modern slavery and human trafficking.

#### **Our Code of Ethics and Business Conduct**

We operate within a framework of principles, guidelines and policies aligned with ethical, social and environmental responsibilities, and we abide by the highest standards of business ethics and compliance, in accordance with our Code of Ethics and Business Conduct (the "Code of Conduct"), and we require our consultants and third-party business partners to uphold the same level of commitment to compliance and business ethics. We do not tolerate any form of slavery or forced labor in our operations or in the operations of our suppliers or vendors.

The [Code of Conduct](#), which applies to our employees, officers, and directors, is available on our website (in multiple languages), along with clear [communication channels](#) for reporting violations or concerns in good-faith using the hyperlinks provided.

#### **Our Third-Party Code of Ethics and Business Conduct**

Meanwhile, our [Third-Party Code of Ethics and Business Conduct](#) ("Third-Party Code of Conduct") is oriented towards our third party consultants, suppliers and other business partners. It is published externally (in multiple languages) as well as in a majority of our indirect purchase order terms and conditions. It defines the standards we require all LivaNova Third Parties to comply with when doing business with us, in addition to

all applicable laws, regulations and industry standards, including a training component whereby we request our third-party partners complete an online training module relating to our expectations around our ethical standards.

We respect the human rights of all our employees and those in our supply chain, demanding a safe, clean working environment; freedom from discrimination and coercion; a prohibition on the use of child or forced labor; and respect for the rights of privacy and protection of access to personal information. We require third-parties to meet our requirements and to pass on these requirements to their respective supply chains. If we were to determine that a supplier was not aligned with our Third-Party Code of Conduct, we have the right to take corrective measures that, in the event of significant non-compliance, may also include immediate termination of the business relationship.

## **RISKS/AUDIT/DUE DILIGENCE**

### **Risks**

Our products are manufactured in our own facilities located in the US, Italy, Germany, Australia, and Brazil, and these are all countries that have zero tolerance for human right violations. As a medical device company, we are required to comply with FDA, ISO 13485 and any other regulations in force in regions where we distribute our products, which requires formal programs for selecting, qualifying, and auditing the vendors for which we do business with. We can definitively state that there is no modern slavery within our own business operations, and the risk is low that modern slavery exists within our Tier 1 supply chains.

We recognize that modern slavery risks often exist within supply chains at lower tier levels. For this reason, we properly vet and take care in approving our Tier 1 suppliers because we depend on them to vet such risks further down the supply chain. We require our Tier 1 suppliers to properly monitor and enforce compliance with our Third-Party Code of Conduct. To date, we have not identified any evidence of modern slavery in our Tier 1 suppliers.

### **Audit**

LivaNova reserves the right to verify and evaluate supplier compliance with the principles of our Third-Party Code of Conduct by taking steps such as Third-Party assessments and audits of Third-Party facilities, supply chains, quality systems and business practices to ensure appropriate observance of the requirements of the Third-Party Code of Conduct.

We also 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. We perform onsite audits of vendors in connection with quality standards. If an audit were to reveal evidence of modern slavery, our Third-Party Code of Conduct reserves the right to take corrective measures. In 2022, our onsite audits did not identify any breaches of our Third-Party Code of Conduct nor any occurrences of modern slavery.

### **Due Diligence**

Throughout 2022, LivaNova continued to evolve its risk assessment and due diligence activities in relation to distributors and sales agencies, upgrading the process and introducing enhanced screening and review activities specifically for sanction-sensitive transactions. Our Third-Party Code of Conduct, ethics and compliance policies, and risk-mitigation procedures all collectively help to assess and monitor our business partners to ensure that we do business with businesses and people that acknowledge and share our high ethical standards.

## **TRAINING**

All employees were required to complete our 2022 Annual Compliance Certification process which encompassed, among other things, a reiteration of their commitment to the principles of our Code of Conduct, an attestation to the Global Acceptable Use policy, and the completion of a Conflict of Interest questionnaire. In addition, LivaNova has provided training and established clear lines of communication for compliance reporting, which includes human rights. LivaNova encourages a safe environment for all employees to “[Speak Up!](#)” and raise concerns. Our third-party managed Ethics Line is available 24/7 across multiple time-zones and languages; employees and business partners are encouraged to speak up in good faith over alleged misconduct, including violations of laws, regulations, our Code of Conduct, our Third-Party Code of Conduct, and our policies and procedures. In 2022, we received no reports relating to human rights violations.

## **LOOKING AHEAD**

It is a sad reality that slavery exists in these modern times, and LivaNova understands that we have a responsibility to contribute to changing that reality. As a good corporate citizen, we have implemented a Code of Conduct that emphasizes our zero tolerance to Modern Slavery both internally, as well as policies and processes that keep human trafficking out of our supply chains externally.

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 continue to review changing and new regulation throughout the world, and we will work to improve our policies, programs, and procedures regarding 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.

### **William Kozy**

Interim Chief Executive Officer and Chair of the LivaNova Board of Directors

LivaNova PLC

19 April 2023

Approved 19 April 2023 by the LivaNova Board of Directors