

Global Anti-Harassment and Anti-Discrimination Policy

Introduction.

At LivaNova we seek to unite people. We value diversity and offer the same welcome to all employees and partners regardless of race, gender, nationality, ethnic origin, religion, age, or sexual orientation. Everyone should be treated with dignity and respect. Bullying, intimidation or harassment of any kind is not acceptable in our workplace.

Purpose.

The purpose of this Global Anti-Harassment and Anti-Discrimination Policy (“Policy”) is to ensure all LivaNova colleagues, globally (full-time, part-time, temporary, and contingent workers) (collectively, “LivaNova Associates”) can thrive in an inclusive workplace free from all forms of harassment, including unfair discrimination, sexual harassment, sexual misconduct, bullying, intimidation, or abusive conduct. This Policy protects our colleagues against inappropriate actions that are unwanted, unwelcome and that create an intimidating, offensive, abusive, or hostile work environment. All LivaNova Associates must comply with this Policy. This document is intended to provide practical guidance on what constitutes prohibited conduct and the manner it will be handled.

Scope.

This Policy extends to all LivaNova Associates. This Policy also covers third parties that deal with LivaNova, so LivaNova Associates can rely on this Policy when dealing with third parties. We do not tolerate harassment of LivaNova Associates by non-LivaNova Associates, nor do we tolerate harassment of non-LivaNova Associates by LivaNova Associates. Our commitment to a harassment free workplace includes our actual workplaces and in any location that can reasonably be regarded as an extension of the workplace, both physical and virtual (all of which we consider to be a “**Company Workplace**” under this Policy). Any LivaNova Associate found to have violated this Policy will be subject to appropriate labor law consequences in accordance with local laws. The reporting procedures below also apply if a third-party violates this Policy, and LivaNova will address the violation with that third-party and consider appropriate additional remediation, including termination of the relationship.

Harassment, Sexual Harassment, and Discrimination Constitute “Prohibited Conduct” under this Policy.

Harassment is any deliberate, offensive, undesired conduct in the Company Workplace that creates a disrespectful, intimidating, hostile, degrading, humiliating, or offensive environment. Harassment can take place in-person, online or through electronic communications and can range from extreme forms, such as verbal/physical violence, threats, or physical touching to less obvious actions like ridiculing, teasing, or repeatedly bothering LivaNova Associates. A single incident that has a lasting harmful effect or a series of incidents may be Harassment. LivaNova Associates who experience Harassment can be of the same or different sex, sexual orientation, race, or other status as the harasser.

Examples of behaviors that may be Harassment include:

- Racial slurs, phrases, or jokes,
- Derogatory remarks about a person’s accent, ethnic origin, physical characteristics, gender expression, sexual orientation, or religion,
- Non-verbal behaviors such as staring, leering, whistling, or indecent gestures,
- Verbal abuse, such as derogatory remarks, insults, and epithets,
- Intimidating acts such as “bullying” or “cyberbullying”,
- Sabotaging a person’s work performance,
- Manipulating a LivaNova Associate’s personal or professional reputation by rumor, gossip or ridicule,

- Using your position of influence, power or authority against another LivaNova Associate,
- Physical assault, stalking or inappropriate physical contact,
- Unwillingness to work with a LivaNova Associate for an inappropriate reason,
- Derogatory statements or postings made about LivaNova Associates on social media platforms, or
- Other conduct or condescending remarks aimed at offending the dignity of another LivaNova Associate.

This list of examples is not exhaustive, and there may be other behaviors that constitute Harassment under this Policy.

It is a violation of this Policy to engage in Harassment of any kind.

Sexual Harassment is Harassment specifically based on unwelcome sexual conduct, unsolicited sexual attention, demand or request for sexual access or favors, sexual innuendo or other unwelcome verbal or physical conduct of a sexual nature. Conduct can be Sexual Harassment regardless of the LivaNova Associate's gender or gender expression; the person being harassed can be of the same sex or opposite sex as the harasser. Sexual Harassment may take different forms. Examples of behaviors that may be Sexual Harassment include:

- Verbal Sexual Harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or "kidding" that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.
- Nonverbal Sexual Harassment includes the distribution or display of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex, gender identity, or gender expression; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters, notes, facsimiles, e-mails, photos, text messages, tweets and Internet postings; or other forms of communication that are sexual in nature and offensive.
- Physical Sexual Harassment includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, and forced sexual intercourse or assault.

This list of examples is not exhaustive, and there may be other behaviors that constitute Sexual Harassment under this Policy.

It is a violation of this Policy to engage in Sexual Harassment of any kind.

What's Not Considered Harassment or Sexual Harassment.

Courteous, mutually respectful, pleasant, noncoercive interactions between LivaNova Associates that are appropriate in the Company Workplace and acceptable to and welcomed by both parties are not considered to be Harassment nor Sexual Harassment.

Discrimination is the unfair denial of equal treatment and opportunity to individuals or groups based on one or more of the characteristics listed below, with respect to the terms, conditions, or privileges of employment, including but not limited to:

- Race, color, ethnic origin, nationality, or national origin,
- Age,
- Religious creed or religious beliefs,
- Sex, including pregnancy, childbirth, or breastfeeding,
- Nationality, immigration status, citizenship, or ancestry,

- Physical disability, mental disability, medical condition, genetic information or characteristics (or those of a family),
- Marital status,
- Gender, gender identity, or gender expression,
- Sexual orientation, or
- Military or veteran status.

This list is not exhaustive and there may be other circumstances in which LivaNova Associates are unfairly denied equal treatment.

It is a violation of this Policy to engage in Discrimination of any kind.

Reporting Procedure.

If you have been subjected to any form of Prohibited Conduct, or if you have witnessed other LivaNova Associates being subjected to Prohibited Conduct, you can report the incident(s) to our Speak Up Helpline in a safe and confidential way at <https://ethicshelpline.livanova.com/>. You can also call our Ethics & Integrity team at +1 800 461 9330 or email us at ethics@livanova.com.

Alternatively, you can also report Prohibited Conduct through any of the following channels:

- Your Manager
- Your Manager’s Manager
- Human Resources Team
- Legal Team

Reporting Duties.

Supervisors and managers who receive complaints related to Prohibited Conduct must promptly report the complaint, within 5 business days. Supervisors and managers who become independently aware or have knowledge of a violation of this Policy must promptly report the violation, within 5 business days. Supervisors and managers who fail to comply with these duties will be subject to labor law consequences in accordance with local laws.

Investigations Process.

LivaNova will investigate every complaint under this Policy in accordance with LivaNova’s Global Procedure for Conducting Internal Investigations (the “Investigations Procedure”). All complaints and investigations related to Prohibited Conduct are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis as more specifically defined in the Investigations Procedure. All LivaNova Associates are expected to cooperate with investigations undertaken pursuant to this Policy. Failure to cooperate in an investigation will result in labor law consequences in accordance with local laws.

No Retaliation.

We recognize that LivaNova Associates may find it difficult to raise complaints about Prohibited Conduct, so this Policy is meant to encourage LivaNova Associates to come forward with their concerns without fear of retaliation. Examples of retaliation include termination, demotion, refusal to promote, transfer (in some circumstances), or any other adverse action that would discourage a reasonable person from opposing or disclosing perceived Prohibited Conduct.

It is a violation of this Policy for any LivaNova Associate to retaliate against an individual solely because she or he, in good faith, complained of, or expressed an intent to report, what she or he believe in good faith to be Prohibited

Conduct, to LivaNova or to a governmental agency, assisted another LivaNova Associate to report, or participated in an investigation proceeding or lawsuit relating to a complaint of Prohibited Conduct, including as a witness.

Our Standards

This Policy sets out LivaNova's standards for addressing and preventing Prohibited Conduct in the Company Workplace. Our regional subsidiaries, offices, plants, and business operations may implement additional policies addressing harassment, discrimination and retaliation, but only to the extent those policies are consistent with the principles set forth in this Policy.

The standards set out in this Policy may be higher and provide greater protection to LivaNova Associates than some local laws. Accordingly, a LivaNova Associate can violate this Policy even if she or he does not violate local laws.

Nothing in this Policy is meant to conflict with local law, including labor laws, which can vary from country to country. To the extent that you perceive a conflict between this Policy and with local law, please seek guidance from your local legal team as to how this conflict has been resolved. In the event of any dispute or ambiguity in the interpretation of this Policy, the same will be determined by LivaNova, whose decision shall be final and binding on the point. Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any LivaNova Associate under any rules or law.

The terms set out in this Policy work in conjunction with, and do not replace, amend or supplement any terms or conditions of employment stated in any collective bargaining agreement that a union has with LivaNova. Wherever employment terms in this policy differ from the terms expressed in the applicable collective bargaining agreement with LivaNova, LivaNova Associates should refer to the specific terms of the collective bargaining agreement, which will control.

LivaNova Associates can rely on this Policy or their local policy or laws or collective bargaining agreements – whichever provides them more rights.