



Health innovation that matters

2016 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 focused on 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 2016.

Policies and Internal Accountability

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.

Reference our [Code of Business Conduct and Ethics](#).

LiveNova has [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. Our review process does not currently focus on measuring or evaluating specific risks of human trafficking or slavery in our supply chain. All suppliers, however, are expected to comply with applicable laws and regulations, including those related to slavery and human trafficking.

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.

In 2016, LivaNova formed a working group led by the Senior Vice President Global Operations focused on improving our due diligence efforts. The group is made up of functions representing Sourcing, Manufacturing, Supply Chain, Legal and Finance who have been tasked with reviewing existing programs, policies, and procedures with the goal of further standardizing and enhancing the program for LivaNova.

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 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.

As part of the merger activities, specific training on the UK Modern Day Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010, was provided to key Employees from our various sourcing and manufacturing sites located around the world and whom are directly involved with sourcing and purchasing activities. The purpose of this training was to increase awareness and identify risks, with the focus on how we can further improve the program moving forward.

Damien McDonald

Chief Executive Officer and Director

LivaNova PLC