

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

2024 Modern Slavery and Human Trafficking Statement

LivaNova PLC (“LivaNova” or the “Company”) 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 its business activities and supply chain. This statement sets out LivaNova’s commitment towards these efforts for the fiscal year starting 1 January 2024 and ending 31 December 2024.

BUSINESS OVERVIEW

LivaNova is a market-leading global medical technology built on nearly five decades of experience and a relentless commitment to provide hope for patients and their families through medical technologies, delivering life-changing solutions in select neurological and cardiac conditions. Headquartered in London, England, LivaNova is comprised of two reportable segments: Cardiopulmonary and Neuromodulation. The Cardiopulmonary segment is engaged in the design, development, manufacture, marketing, and sale of cardiopulmonary products, including heart-lung machines, oxygenators, autotransfusion systems, perfusion tubing systems, cannulae, and other related accessories. The Neuromodulation segment is engaged in the design, development, manufacture, marketing, and sale of devices that deliver neuromodulation therapy for treating drug-resistant epilepsy and difficult-to-treat depression. The Neuromodulation segment is also engaged in the development and management of clinical testing for LivaNova’s aura6000 System for treating obstructive sleep apnea.

As of December 31, 2024, LivaNova had approximately 2,900 employees with presence in more than 100 countries for the benefit of patients, healthcare professionals, and healthcare systems worldwide.

POLICIES and INTERNAL ACCOUNTABILITY

Mission

LivaNova strives to provide hope for patients and their families through medical technologies, delivering life-changing improvements for patients. LivaNova can only uphold this mission with the trust and respect of its stakeholders, including patients, physicians, employees, the communities in which the Company operates, suppliers, and shareholders. That trust and respect comes with LivaNova meeting the highest standards of business ethics and compliance. It is not only what LivaNova does but how the Company does it, and this includes taking steps to ensure that LivaNova complies, in all aspects, with laws related to modern slavery and human trafficking.

Code of Ethics and Business Conduct

LivaNova’s [Code of Ethics and Business Conduct](#) (the “Code”) applies to all directors, officers, and employees of the Company. The Code provides a framework of principles, guidelines, and policies that are aligned with ethical, social, and environmental responsibilities. Any form of slavery, including unfair wages, debt bondage, child labour or forced labour in the Company’s operations or in the operations throughout the Company’s supply chain, is not tolerated. A copy of the Code is available on LivaNova’s website, along with clear communication channels for reporting violations or concerns in good faith. The Code provides that violation of any laws, Company policies, procedures or other written guidance, and any manager who knowingly permits or directs a subordinate to do so, may be disciplined accordingly, up to and including termination of employment.

Third-Party Code of Ethics and Business Conduct

LivaNova’s [Third Party-Code of Conduct](#) is oriented towards its third-party consultants, suppliers, and other business partners. It is published externally as well as within LivaNova’s purchase order terms and conditions. It defines the standards LivaNova expects of its third parties when doing business with the

Company, in addition to all applicable laws, regulations, and industry standards. In addition, it includes an expectation for third parties to pass on these standards to their subsidiaries, subcontractors and affiliates, and have in place processes to monitor their compliance. LivaNova does not tolerate any form of slavery or forced labour in the operations of its third parties. The Company believes that its business can only succeed where the rights of all workers in the supply chain of the business are protected and respected. If LivaNova were to determine that a third-party was not aligned with the Company's Third-Party Code of Conduct, LivaNova reserves the right to take corrective measures, which may include immediate termination of the business relationship.

RISKS/AUDIT/DUE DILIGENCE

Risks

LivaNova has manufacturing and research facilities located in the U.S., Italy, Germany, Australia, and Brazil. For LivaNova employees, background checks during the recruiting process help minimise the risk of forced or child labour. In addition, LivaNova requires third-party partners, including agencies that provide on-site contract workers, to meet the Company's zero tolerance standards.

As a medical device company, LivaNova is required to comply with regulations requiring formal programmes for selecting, qualifying, and auditing certain third parties with which LivaNova does business. These programmes are managed by LivaNova throughout its sourcing and procurement processes, at times with third-party audit assistance. LivaNova evaluates relevant risks within its supply chain through various methods, which include an automated and at least quarterly supplier/customer screening, a supply chain risk analysis of raw material suppliers, and in certain instances, onsite auditing of direct suppliers. The aforementioned screening considers sanction lists such as the Kharon Forced Labour and the Descartes Anti-Bribery and Anti-Corruption datasets, which includes companies and supply chains targeted by the Uyghur Forced Labor Prevention Act (UFLPA), raw materials manufactured in whole or in part in Xinjiang, China (a region declared by the U.S. State Department, European Parliament and Canadian Parliament to be committing genocide against ethnic and religious minorities), and companies co-located with entities flagged as high risk for forced labour. The risk that modern slavery or human trafficking exists within the Company's Tier 1 supply chains has been assessed to be low. To date, LivaNova has not identified any evidence of modern slavery or human trafficking in its direct supplier base. Currently, the Company does not require direct suppliers to certify compliance with anti-slavery and human trafficking laws in the country or countries in which they do business.

Audit

LivaNova reserves the right to verify and evaluate supplier compliance with the human rights principles of its Third-Party Code of Conduct by way of an assessment and/or an audit. Audits may be announced in advance, are performed by LivaNova or independent third parties contracted by LivaNova and may include site visits. Audit need is determined from a supply risk perspective, determined by LivaNova's risk assessment procedures. For example, in 2023, LivaNova's Procurement team conducted a supply risk assessment that included an ESG analysis that encompassed a review of social risks. The findings from the assessment have subsequently informed our due diligence process with heightened scrutiny on certain suppliers, none of which were found to have any evidence of modern slavery or human trafficking.

Due Diligence

Per the above, LivaNova's compliance procedures and due diligence activities in relation to distributors and sales agencies include enhanced screening and review of activities for sanction-sensitive transactions. LivaNova's policies and guidelines collectively help to assess and monitor the Company's business partners to ensure that LivaNova partners with third parties who acknowledge and share its high ethical standards. LivaNova reserves the right to take any necessary mitigation action to address any potential risk of modern slavery and human trafficking within the Company's business operations and third-party partners.

TRAINING, ACCOUNTABILITY, AND EFFECTIVENESS

LivaNova's annual compliance training program consists of core training on the Code of Ethics and Business Conduct for all employees as well as role-based training on specific topics including those for field-based personnel. This training encompasses modern slavery, human trafficking, and other human rights topics and is regularly refreshed and made available to employees worldwide to ensure a deep understanding of compliance obligations, product regulations, and the ethical standards the Company upholds. At LivaNova, open and transparent communication is a core pillar of the compliance culture. Employees and third parties are encouraged to raise questions or concerns in good faith directly to LivaNova leadership, Compliance, Human Resources, or Legal. Additionally, employees and third-parties may contact the [LivaNova Ethics Helpline](#), a hotline which is available globally, 24/7 and in many languages, to report concerns about potential violations of the Company's Code, LivaNova's Third-Party Code of Conduct, policies and procedures, or applicable laws and regulations. This is supported by our [Global Speak Up and Non-Retaliation Policy](#). Senior leadership communicates the Company's unwavering commitment to ethical conduct regularly, reinforcing the importance of compliance at every level of the organisation.

In 2024, no instances of modern slavery and human trafficking were identified in LivaNova's operations, and the Company has not received any complaints via the LivaNova Ethics Helpline in relation to modern slavery and human trafficking.

LOOKING AHEAD

LivaNova is committed to identifying areas for improvement in its approach to preventing modern slavery and human trafficking and will continue to engage with stakeholders and monitor internationally recognised standards, applicable laws, and regulatory changes throughout its global business operations to inform future updates to related practices and policies.

/s/ Vladimir Makatsaria

Chief Executive Officer LivaNova PLC
23 April 2025

Date: Approved 23 April 2025 by the LivaNova Board of Directors