



Global Speak Up and Non-Retaliation Policy			
Policy #	CO-POL-003	Audience	Global
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# Global Speak Up and Non-Retaliation Policy

October 2024





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## Section 1. Overview

### 1.1. Purpose and Scope

This Global Speak Up and Non-Retaliation Policy (the “Policy”) is designed to promote openness, accountability, and a culture of integrity and fairness. It offers Company Personnel<sup>1</sup> guidance on:

- The **responsibility** that each of us has to speak up about actual or potential misconduct;
- The **reporting channels** available to speak up; and
- LivaNova’s **policy against retaliation** and its **commitment to protect** those who report misconduct in good faith and in a timely manner.

### 1.2. Why Speak Up?

Speaking up about actual or potential misconduct is the right thing to do—and anyone who raises a concern in good faith and in a timely manner will never be penalized for doing so. The early detection, investigation, and remediation of potential misconduct is an essential part of any compliance program. A robust “speak up” culture also ensures that we are well positioned to advance our patient-centric mission, drive meaningful innovation, and maximize shareholder value.

## Section 2. How to Speak Up

### 2.1. What Should Be Reported?

Company Personnel have a responsibility to promptly report, in good faith and in a timely manner, any actual, potential, or suspected breach of the Code of Conduct, Company policies and procedures, and other suspected or actual misconduct, including violations of law (a “Reportable Concern”).

When reporting a concern, we encourage you to provide as much information to ensure we are able to conduct a full investigation as fast as possible.

### 2.2. Who to Contact?

It is important to identify and escalate Reportable Concerns as early as possible. LivaNova therefore encourages you to report concerns in whatever form and by whatever method is most comfortable to you, including:

- Your immediate supervisor, your immediate supervisor’s manager, or the head of the relevant team;
- Compliance, by email ([Ethics@livanova.com](mailto:Ethics@livanova.com)) or by letter addressed to Attn: Chief Compliance Officer, LivaNova PLC, 20 Eastbourne Terrace, London W2 6LG, United Kingdom;
- LivaNova’s third party-managed Ethics Helpline, which can be accessed online via <https://livanova.ethicspoint.com> or by telephone via (833) 208-4076 (additional local numbers available [here](#));

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<sup>1</sup> For the purposes of this Policy, “Personnel” includes employees, executive and non-executive directors, agents, (paid or unpaid) interns, contractors, suppliers, and other third-party business partners.



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- A member of the executive leadership team; or
- Legal or Human Resources.

If you are a supervisor, manager, or senior leader who receives a report of misconduct, your first responsibility is to listen to the reporter; from there, you satisfy your responsibility under this Policy by reporting the issue to the Compliance team or by submitting it to the Ethics Helpline. There is no need to—and in fact, the expectation is that you will not—investigate the report on your own.

### 2.3. Confidentiality

Those handling a report, including Investigators, are prohibited from sharing information about a report with anyone who does not “need to know.” This includes communicating the fact that a report has been made or that an investigation is underway or being considered, identifying the person(s) involved, the subject matter, the process followed, the materials or information gathered, and the results of the investigation.

### 2.4. Non-Retaliation

Retaliation against anyone who raises a Reportable Concern or anyone cooperating with an investigation will never be tolerated and could result in disciplinary action, up to and including dismissal. Retaliation can take many forms and includes:

- Negative employment action, such as demotion, termination, salary reduction, or an unjustified job or shift reassignment.
- Efforts to silence or punish a reporter through economic incentives or other benefits;
- Actions that undermine the reporter’s psychological safety—such as intimidation, actual or implied threats, bullying, harassment, or discrimination; and
- Exclusionary behaviors, such as shunning and/or avoiding a reporter, excluding them from meetings or email chains, giving someone the “cold shoulder,” gossiping about the individual, interfering with the individual’s relationships with other LivaNova Personnel, or creating—or allowing others to create—a work atmosphere that is hostile towards the individual.

Retaliation must be reported as soon as possible through one of the speak up channels listed in 2.2 above.

### 2.5. External Reporting

Nothing in this Policy prohibits LivaNova personnel from reporting known violations of law to any government agency, regulatory body, whistleblowing authority, or the general public.

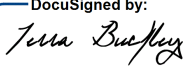
### 2.6. Local Considerations

Some countries and jurisdictions have specific laws associated with “speaking up” and “whistleblowing”, with the result that in some countries, we may have implemented country-specific procedures. Company Personnel who would like more information on applicable local legal requirements, reporting channels, and resources should reach out to Compliance or their local Legal representative.



Section 3. What Happens to Reported Concerns

LivaNova takes all reports seriously. Reports are evaluated, investigated, and monitored in compliance with LivaNova’s Global Procedure for Conducting Internal Investigations and related country-specific annexes, where applicable.

Approver Name	Role	Signature with Date
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