

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

## 2023 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 its business activities and supply chains. This statement sets out LivaNova's commitment towards these efforts for the fiscal year starting 1 January 2023 and ending 31 December 2023.

### **POLICIES and INTERNAL ACCOUNTABILITY**

#### **Mission**

LivaNova unites 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 not only physicians and patients, but of its employees, the communities in which the Company works, and of its shareholders, partners, customers, and suppliers. 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.

LivaNova upholds the highest ethical standards and complies with laws and regulations applicable to its business, including laws related to modern slavery and human trafficking. The Company is committed to ensuring that its supply chain reflects its values and beliefs by conducting business in ways that are consistent with LivaNova's applicable policies and practices.

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

In accordance with LivaNova's [Code of Ethics and Business Conduct](#) (the "Code of Conduct"), the Company's employees and Board of Directors operate within a framework of principles, guidelines and policies that are aligned with ethical, social and environmental responsibilities. LivaNova does not tolerate any form of slavery or forced labor in the Company's operations or in the operations of its suppliers. LivaNova's Code of Conduct is available on the its website, along with clear communication channels for reporting violations or concerns in good faith using the hyperlinks provided.

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

LivaNova's [Third Party Code of Ethics and Business Conduct](#) (the "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 its third parties to comply with when doing business with LivaNova, in addition to all applicable laws, regulations and industry standards, including a training component whereby LivaNova requests that its third party partners complete an online training relating to the Company's expectations around it's ethical standards. LivaNova requires third party partners to meet its requirements and relay these requirements to their respective supply chains. If LivaNova were to determine that a supplier was not aligned with the Company's Third Party Code of Conduct, LivaNova has the right to take corrective measures, which may include immediate termination of the business relationship.

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

#### **Risks**

LivaNova's products are manufactured in the Company's own facilities located in the US, Italy, Germany, Australia, and Brazil, all countries that have zero tolerance for human right violations. As a medical device company, LivaNova is required to comply with FDA, ISO 13485 and any other regulations in force in regions where the Company distributes its products, which requires formal programs for selecting,

qualifying, and auditing the vendors that LivaNova does business with. There is no modern slavery within the Company's own business operations, and the risk that modern slavery exists within the Company's Tier 1 supply chains is low.

Modern slavery is considered throughout LivaNova's procurement process. LivaNova evaluates the risks of modern slavery within its supply chain through various methods, which include a supplier/customer screening, a supply chain risk analysis and in certain instances, onsite auditing of direct suppliers. The aforementioned screening considers sanction lists such as the Kharon Forced Labour dataset and the Dow Jones Sanction Lists, which includes lists published by the US Department of Treasury Office of Foreign Assets Control, the United Nations and the European Union. To date, LivaNova has not identified any evidence of modern slavery in its direct supplier base.

### **Audit**

LivaNova reserves the right to verify and evaluate supplier compliance with the principles of its Third Party Code of Conduct by taking steps such as third party partner assessments and associated facility, supply chain, quality system, and business practice audits to ensure appropriate observance of the requirements of the Third Party Code of Conduct. . Verification is not made by independent, unannounced audits. Audits are performed by LivaNova, or third parties contracted by LivaNova and may include site visits. Audit need is determined from a supply risk perspective, determined by LivaNova's quality management system. Audits are regularly conducted on suppliers to confirm that the services or materials provided conform to defined requirements and comply with LivaNova's Ethics & Integrity Policies (including the and [Third Party Code of Conduct](#) and the [Business Integrity Policy](#)).

### **Due Diligence**

LivaNova's risk assessment and due diligence activities in relation to distributors and sales agencies include introducing enhanced screening and reviewing activities specifically for sanction-sensitive transactions. LivaNova's Ethics & Integrity Policies, and risk-mitigation procedures, collectively help to assess and monitor the Company's business partners to ensure that LivaNova does business with businesses and people that acknowledge and share its high ethical standards.

### **TRAINING, ACCOUNTABILITY AND EFFECTIVENESS**

Every year, all LivaNova employees are required to complete an Annual Compliance Certification process which encompasses, among other things, a reiteration of their commitment to the principles of LivaNova's Code of Conduct, and an attestation to the Business Integrity Policy and the Speak Up Policy. 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, contractors, and third party partners to "[Speak Up!](#)" and raise concerns. LivaNova's externally-managed Ethics Line is available 24/7 across multiple time-zones and languages, and employees and third party partners are encouraged to speak up in good faith over alleged misconduct, including violations of laws, regulations, the LivaNova's Code of Conduct, the Third Party Code of Conduct, and the Company's policies and procedures. In 2023, LivaNova received no reports relating to human rights violations.

### **LOOKING AHEAD**

LivaNova is committed to identifying areas for improvement in its approach to preventing modern slavery and will continue to monitor applicable law and regulatory changes throughout its global business operations.

**Vladimir Makatsaria**

Chief Executive Officer

LivaNova PLC

17 April 2024

Date: Approved 17 April 2024 by the LivaNova Board of Directors