



Health innovation that matters

Declaration of Compliance with California Health and Safety Code

§§ 119400 – 119402

2025





Declaration of Compliance with California Health and Safety Code

§§ 119400 – 119402

NOTICE: This information is provided pursuant to the requirements of California Health & Safety Code §§ 119400 – 119402, which requires pharmaceutical companies conducting business in California to make available their compliance program and to provide annual written declaration of their adherence to their compliance program and the requirements of California Health & Safety Code §§ 119400 – 119402.

LivaNova (or “Company”) has established an effective compliance program overseen by the Chief Compliance Officer to provide advice to LivaNova employees, officers, and directors (collectively “Personnel”) on conducting business ethically. Personnel are expected to act in accordance with the Company code of conduct and all applicable U.S. and global laws, regulations, and industry standards.

LivaNova’s compliance program is based on the standards set forth by the Compliance Program Guidance for Pharmaceutical Manufacturers published by the Department of Health and Human Services, Office of Inspector General (“OIG Guidance”). The Company designs, manufactures, distributes and sells medical devices rather than pharmaceutical products. Therefore, LivaNova has adopted the AdvaMed Code of Ethics on Interactions with Health Care Professionals, which is similar to the pharmaceutical industry’s PhRMA Code on Interactions with Health Care Professionals.

In compliance with the requirements of California Health and Safety Code Sections §§ 119400 - 119402, LivaNova has established an annual, aggregate limit of two thousand five hundred dollars (\$2,500) on the educational items, promotional materials, and meals associated with an informational presentation that may be provided to an individual “medical or health care professional” defined as a:

- Person licensed by California law to prescribe drugs for human patients
- Medical student in California, or
- Member of a drug formulary committee in California

Annual Declaration January 2025

LivaNova declares that to its knowledge, and based on good faith and belief, it follows the Company’s compliance program and the requirements of California Health and Safety Code, §§ 119400 - 119402. A copy of this declaration is posted on our corporate website at www.livanova.com and is also available upon request by emailing AskCompliance@livanova.com or calling 1-833-208-4076.



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