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

Modern Slavery and Human Trafficking Statement for the year ended 31 Dec 2021

LivaNova is a worldwide leader in cardiovascular and neuromodulation solutions, dedicated to creating meaningful products and therapies that transform lives each and every day.

Our diverse product portfolio and pipeline include these therapeutic areas:

- Drug-Resistant Epilepsy
- Advanced Circulatory Support
- Cardiopulmonary
- Difficult-to-Treat Depression
- Heart Failure
- Obstructive Sleep Apnea

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 has approximately 3000 employees worldwide and operates in over 100 countries. Our products are manufactured in our facilities located in the US, Italy, Germany, Australia, and Brazil.

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 slavery and human trafficking from our business activities and supply chains. This statement sets out LivaNova’s commitment towards these efforts for the fiscal year starting 1 January 2021 and ending 31 December 2021.

As part of our initiative to identify and mitigate risks relating to modern slavery, LivaNova has taken the steps described further in this statement and is continuously working to further improve our policies and practices to ensure: 1) materials and services provided to LivaNova are procured only from suppliers who share our same level of commitment, and 2) modern slavery does not exist within our own business operations.

POLICIES and INTERNAL ACCOUNTABILITY

Our Mission

At LivaNova, we unite to provide hope for patients and their families through innovative medical technologies, delivering life-changing improvements for both the Head and Heart. We can only uphold this mission with the trust and respect of not only physicians and patients but of our employees, the communities in which we work, shareholders, partners, customers and suppliers. That trust and respect comes with us meeting the highest standards of business ethics and compliance. It is not only what we do but how we do it, and this includes taking steps to ensure that we comply, in all aspects, with laws related to modern slavery and human trafficking.

Our Values

To help employees make the best decisions, we have clearly communicated a set of values we expect all our employees to follow:

• **Patients First.** Our shared purpose is to improve the lives of patients
• **Meaningful Innovation.** We develop novel products and therapies to address multiple disease states
• **Act with Agility.** We challenge ourselves to continuously improve and act nimbly
• **Commitment to Quality and Integrity.** We dedicate ourselves to high quality and integrity in everything we do
• **Collaborative Culture.** We value diversity of thought and our collective strength as a team

Our Code of Ethics and Business Conduct

We understand and respect the obligation we have to our patients and their families and caregivers as well as to our business partners and the environment at large. We operate within a framework of principles, guidelines and policies aligned with ethical, social and environmental responsibilities, and we abide by the highest standards of business ethics and compliance, per our Code of Ethics and Business Conduct (the "Code of Conduct"), and we require our consultants and third-party business partners to uphold the same level of commitment to compliance and business ethics.

Respecting human rights is a key requirement for us. This includes respecting human rights in our workplace and in our supply chain. We do not tolerate any form of slavery or forced labor in our operations or in the operations of our suppliers or vendors.

The Code of Conduct applies to our employees, shareholders, partners, customers and suppliers and is available on our website, along with clear communication channels for reporting violations or concerns in good-faith using the hyperlinks provided.

Our Third-Party Code of Ethics and Business Conduct

LivaNova also embraces the key principles of the International Labour Organization's fundamental conventions. We believe that our business can only succeed where the rights of all workers involved in the value chain of our business are protected and respected, and we aim to conduct business with third parties including consultants, suppliers and other business partners ("Third Parties") who share our commitment to operating in a responsible and ethical manner.

Our Third-Party Code of Ethics and Business Conduct ("Third-Party Code of Conduct"), which we have published externally (in multiple languages) as well as within our distributor agreements and purchase order terms and conditions, defines the standards we require all LivaNova Third Parties to comply with when doing business with us, in addition to all applicable laws, regulations and industry standards. In 2021, the Third-Party Code of Conduct was updated to incorporate a training component whereby we request our third-party partners complete an online training relating to our expectations around our ethical standards.

Compliance with our Third-Party Code of Conduct informs an important part of LivaNova's Third-Party selection and evaluation. We respect the human rights of all our employees and those in our supply chain, demanding a safe, clean working environment; freedom from discrimination and coercion; a prohibition on the use of child or forced labor; and respect for the rights of privacy and protection of access to personal information. We require Third-Parties to meet our requirements and to pass on these requirements to their respective supply chains. If an audit conducted by or on behalf of LivaNova reveals

non-alignment with our Third-Party Code of Conduct, we have the right to take corrective measures that, in the event of significant non-compliance, may also include immediate termination of the business relationship.

VERIFICATION

LivaNova proactively promotes ethical behavior and encourages employees to Speak Up and report violation of laws, regulations, our Code of Conduct, our Third-Party Code of Conduct and our policies and procedures. While we encourage employees to raise issues with their managers, we also have an Ethics and Integrity Helpline where concerns can be reported confidentially and anonymously. All reports received are triaged to ensure timely and effective follow up. In 2021, we received no reports relating to human rights violations.

RISKS/AUDIT/DUE DILIGENCE

Risks

Our products are manufactured in our own facilities located in the US, Italy, Germany, Australia, and Brazil, and these are all countries that have zero tolerance for human right violations. As a medical device company, we are required to comply with FDA and ISO 13485, which require formal programs for selecting, qualifying, and auditing the vendors for which we do business with. Accordingly, the risk is low that modern slavery exists within our own business operations or within our Tier I supply chains.

We recognize that modern slavery risks often exist within supply chains at lower tier levels. For this reason, we properly vet and take care in approving our Tier 1 suppliers because we depend on them to vet such risks further down the supply chain. For instance, we require our Tier 1 suppliers to properly monitor and enforce compliance with our Third-Party Code of Conduct. To date, we have not identified any evidence of modern slavery in our Tier 1 suppliers.

Audit

LivaNova reserves the right to verify supplier compliance with our defined requirements, which are articulated in our purchase order agreements which contain reference to our Code of Conduct and Third-Party Code of Conduct. We evaluate compliance with the principles of our Third-Party Code of Conduct by taking steps such as Third-Party assessments and audits of Third-Party facilities, supply chains, quality systems and business practices to ensure appropriate observance of the requirements of the Third-Party Code of Conduct.

We also 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 and may include site visits. Due to the worldwide COVID-19 pandemic, onsite audits of vendors in connection with quality standards were either postponed or conducted virtually throughout 2021. Regardless, any virtual audits did not identify any breaches of our Third-Party Code of Conduct nor any occurrences of modern slavery. We fully expect to visit and perform onsite audits once global conditions improve.

In addition, our Corporate Compliance Program requires actively auditing and monitoring of key processes to ensure compliance with the Company’s compliance policies and procedures.

Due Diligence

LivaNova created an ESG Task Force in 2020, a cross-functional team of leaders focused on establishing a comprehensive program to optimize our ESG efforts with full support from the executive team. Guided by UN Global Compact Principles and Sustainable Development Goals, the ESG Task Force organized a framework around various LivaNova ESG efforts and is implementing strategies to put these values into action.

Our Head of Corporate Social Responsibility is responsible for implementing our ESG programs, and all of our manufacturing locations have formal programs specified to a site level. Our Board's Nominating and Corporate Governance (NCG) Committee charter encompasses ESG oversight under its list of duties and responsibilities, and as a result, the NCG Committee receives regular updates on the ESG Task Force's activities at each of its quarterly meetings. The directors on the NCG Committee actively engage on this topic every quarter, and the NCG Committee Chair reports material ESG developments to the full Board quarterly.

Throughout 2021, LivaNova continued to evolve its risk assessment and due diligence activities in relation to distributors and sales agencies, upgrading the process and introducing enhanced screening and review activities specifically for sanction-sensitive transactions. It is important that when we do business with others, we have confidence they share our values. The Third-Party Code of Conduct, Ethics and Integrity policies, and risk-mitigation procedures all collectively help to assess and monitor our business partners to ensure that we do business with people that acknowledge and share our high standards. This will both protect us and allow LivaNova to do its part in the fight against unethical and uncompliant business practices.

In addition, LivaNova has assigned a Compliance Officer who is responsible for implementing our Corporate Compliance Program.

TRAINING

The Company’s 2021 Annual Compliance certification process was offered both online and offline, depending on the resources available to the employees. One hundred percent of corporate employees and operators who accessed the certification online completed the program which encompassed, among other things, reiteration of their commitment to the principles of our Code of Conduct, and attendance in a mandatory online training focusing on how to lawfully and ethically interact with healthcare professionals (including an electronic attestation to relevant policies). Operators who completed the offline training also (1) reiterated their commitment to the principles of our Code of Conduct and (2) confirmed their consent to our Employee Privacy Notice.

LivaNova has provided training and has established clear lines of communication for compliance reporting, which includes human rights. LivaNova encourages a safe environment for all employees to “Speak Up!” and raise concerns. Our third-party managed Ethics Line is available 24/7 across multiple time-zones and languages, and employees are encouraged to speak up in good faith over alleged misconduct. Every claim received is addressed per our internal investigation procedure and remediated where substantiated. In 2021, we investigated 144 alleged violations across 23 different countries, resulting in several follow-up corrective actions including, but not limited to, process reviews, additional training and coaching, and in certain instances, disciplinary measures for employees. As noted above, in 2021, we received no reports relating to human rights violations.

As part of our employee review process, we continue to leverage the Value Achievement Rating (VAR) as an input into each employee's overall performance management rating. The VAR is an assessment of each employee's commitment and demonstration of "Living our Values" and is reviewed and discussed with the employee as part of the annual performance review process.

Finally, in 2021, LivaNova unveiled a new section of our company website dedicated to sustainability. Visitors can now find additional information about the Company's dedication to People, Products and the Planet, in addition to our existing Corporate Governance and Ethics & Integrity materials.

LOOKING AHEAD

It is a sad reality that slavery exists in these modern times, and LivaNova understands that we have a responsibility to contribute to changing that reality. As a good corporate citizen, we have implemented a Code of Conduct that emphasizes our zero tolerance to Modern Slavery both internally, as well as policies and processes that keep human trafficking out of our supply chains externally.

Everything we do is intended to support our mission. LivaNova will continue to work to increase employee awareness of the risks around modern slavery, specifically those who are involved with sourcing and buying decisions. We continue to review changing and new regulation throughout the world, and we will work to improve our policies, programs, and procedures regarding how we identify and mitigate risks in our supply chains to ensure our suppliers and third-party business partners are upholding the same level of commitment to compliance and business ethics as we do.

Damien McDonald
Chief Executive Officer and Director
LivaNova PLC
20 April 2022

Approved 20 April 2022 by the LivaNova Board of Directors