

LIVANOVA THIRD PARTY CODE OF ETHICS AND BUSINESS CONDUCT

Introduction

LivaNova is a worldwide leader in cardiovascular and neuromodulation solutions, dedicated to creating meaningful products and therapies that transform lives each and every day. 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, which is located here: <https://investor.livanova.com/corporate-governance/code-of-business-conduct-and-ethics>.

LivaNova 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. Accordingly, this Third Party Code of Ethics and Business Conduct ("Code of Conduct") outlines the minimum 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.

Focus Areas

1. Human Rights and Labor Conditions

Freely Chosen Employment

Third Parties shall be committed to respect and support the human rights of workers and to treat them with dignity and respect. Third Parties shall not use forced labor or any other form of involuntary labor, non-paid workers or illegal workers. Third Parties shall not hold people in slavery nor engage in human trafficking.

California Transparency in Supply Chains Act and UK Modern Slavery Act

Third Parties are expected to comply with the principles of the California Transparency in Supply Chain Act and UK Modern Slavery Act Statement published on LivaNova's website located here: <https://www.livanova.com/en-US/Home/About-Us/Our-Ethics.aspx#modern-slavery-statement>.

Child Labor

Third Parties shall comply with local minimum working age laws and requirements, and not employ child labor.

Non-discrimination

Third Parties shall provide a workplace environment free of harassment, threats or oppression and shall not discriminate for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, marital status, religion, political affiliation and union membership.

Wages, Working Hours and Freedom of Association

Third Parties shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.

Third Parties shall respect the rights of workers, as set forth in local laws, to associate freely, bargain collectively, join or not join labor unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Health and Safety in the Workplace

Third Parties shall provide a safe and healthy working environment. They shall protect workers from over-exposure to chemical, biological, physical hazards. Third Parties shall identify and assess emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.

2. Environment

Third Parties shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment. Third Parties are encouraged to conserve energy and natural resources, to avoid the use of hazardous materials where possible, and to engage in activities that reuse and recycle materials.

3. Anti-Bribery and Anti-Corruption

Third Parties shall conduct business in an ethical manner and act with integrity. Third Parties shall not offer or pay bribes, no matter the location, the situation, or who is involved, nor shall Third Parties allow their agents to do so on their behalf. Third Parties also shall not accept or take bribes of any kind.

4. Anti-Trust/Fair Competition

Third Parties shall comply with fair competition and anti-trust law, and they shall be transparent about their business activities, structure, financial situation, as required by any applicable laws and industry standards.

5. Trade Compliance

Third Parties shall be committed to complying with all applicable national and international laws, regulations, and restrictions relating to the movement of products, software, and technology around the world. LivaNova's Third Party personnel are not authorized to conduct any business activities that are inconsistent with, or in violation of, any export, import, sanctions, or boycott related laws or regulations.

6. Confidentiality and Data Privacy

Third Parties are expected to protect LivaNova proprietary and confidential information – and must enforce policies that comply with LivaNova's requirements regarding maintaining the confidentiality of LivaNova information. Similarly, Third Parties must comply with all privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

7. Intellectual Property

Third Parties must safeguard LivaNova intellectual property and confidential information. Any use, disclosure and handling of LivaNova's technology, knowledge and other LivaNova intellectual property must be in accordance with any applicable agreements.

8. Conflict Minerals

Third Parties shall support our efforts to comply with Section 1502 of the Dodd Frank Act relating to the sourcing of conflict minerals used in products by proactively identifying and working towards eliminating the use of any minerals that fund or benefit armed groups from within our supply chain.

Implementation

1. Third Party Selection

Compliance with this Code of Conduct informs an important part of LivaNova's Third Party selection and evaluation. It is the responsibility of each Third Party to meet the requirements of this Code of Conduct and to pass on these requirements to its respective supply chain.

2. Training

It is critical that Third Parties act with integrity and make ethical decision in all business dealings that are done with, for, or on behalf of LivaNova. This Code of Conduct sets the behavioral standards we expect our Third Parties to comply with and helps them make ethical choices and, most importantly, support better patient safety outcomes. To ensure full understanding of and compliance with our ethical standard expectations, LivaNova asks its Third Parties to visit [this link](#) and complete the online training.

3. Third Party Review

LivaNova may evaluate compliance with the principles of this Code of Conduct with actions that may include a Third Party assessment and or an audit of Third Party facilities, supply chains, quality systems and business practices. Specifically, LivaNova reserves the right to (1) conduct audits and inspections and /or appoint third parties to make inspections; and (2) have access to all facilities, books and records relevant to ensure appropriate observance of the requirements of the Code of Conduct.

4. Remediation

If an audit conducted by LivaNova or on behalf of LivaNova reveals non-alignment with this Code of Conduct, LivaNova reserves the right to take corrective measures that, in the event of significant non-compliance, may also include immediate termination of the business relationship with the Third Party.

5. Reporting Concerns

If there are any concerns related to compliance with this Code of Conduct, Third Parties may contact LivaNova's Ethics and Integrity Department at ethicshelpline.livanova.com.