

Guide to Business Conduct

INTEGRITY IS OUR FOCUS



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More Than a Century of Caring A Message from Our CEO



Quality. Integrity. Service.

Where others see complexity, Mallinckrodt Pharmaceuticals (“Mallinckrodt” or “Company”) sees value for patients. For more than 150 years, Mallinckrodt employees have connected with a core set of values to guide the day-to-day commitments we make to all our stakeholders including our patients, customers, regulators, financial stakeholders, and our vendors and suppliers. These values enable us to comply with the critical regulations that govern our business and empower us to achieve our mission.

Our *Guide to Business Conduct* is a valuable resource because it helps us put our values into practice on the job and promotes a common vision – one that holds us to the highest standards of honesty and integrity, not only in the manufacture and sale of our products, but also the way in which we manufacture and sell them.

My leadership team and I expect each of you to read, understand and follow Mallinckrodt’s Guide. I invite you to ask questions whenever you are uncertain. Our Company prohibits retaliation against anyone who raises a concern, so feel free to promptly bring questionable matters to our attention.

As Mallinckrodt colleagues, we each own integrity and compliance and have a responsibility to model the principles outlined in this Guide. Remember, each decision you make on behalf of our Company impacts our reputation and the trust that has been placed in us by patients and all of our stakeholders for more than a century and a half.

Thank you for your passion and commitment to our mission – “Managing Complexity, Improving Lives.”

Mark C. Trudeau
President and Chief Executive Officer



Our Mission

Managing Complexity. Improving Lives.



Our Core Values



Patient-Centric “We put our patients first.”

Patients and their families are at the heart of what we do.
Our decisions and our actions are guided by our commitment to improve lives.



Integrity “We do the right thing.”

We do what we say we are going to do.
We can be trusted to align our actions and our words with our mission and values.



Innovative “We innovate to thrive.”

By thinking differently, we solve complex challenges with innovative solutions.
We are agile, always seeking new ways to continuously improve our performance.



Collaborative “We own it, together.”

We hold ourselves and each other accountable for our shared success.
We are inclusive and work together towards our common goals.



We Honor Our Guide

We recognize that the way we work is just as important as the work we do – our Guide helps to preserve the trust that people have placed in our Company and our products.

In this Section:

- A Shared Commitment
- Your Responsibilities
- The Responsibilities of Leaders
- Asking Questions / Sharing Concerns
- No Retaliation

A Shared Commitment

We Believe ...

In holding each other to the same high standards.

Throughout our history, we have seen dramatic changes in our industry, but our commitment has remained the same – to operate with honesty, integrity and in compliance with applicable laws and regulations everywhere we conduct business.

Why do we have a Guide?

Our Guide is designed to help you understand your obligations as an employee. Although it does not provide the answer to every question you might face on the job, it will point you in the right direction, ethically speaking, and direct you to resources for guidance when the right direction is unclear.

If, at any time, you find that a local custom or practice conflicts with our Guide or policies, always follow the more restrictive requirement. Use good judgment, and if you do not understand what is required of you, or if you cannot find the answer to a question, seek help from your manager or one of the [contacts](#) listed at the end of the Guide.

Who must follow our Guide?

Our Guide applies to all employees, officers and directors in all Company locations. We also expect that those who work with us or on our behalf – such as contractors, agents and vendors – will follow our high standards.

In certain countries like the United States, a violation of our Guide can result in disciplinary action – including termination of employment – and in some cases, civil or criminal consequences for the person involved and for our organization.



Not sure? Ask yourself:

Is it legal?

Is it in line with our mission
and core values?

Does it comply with our Guide,
our policies and our procedures?

Would I be comfortable
if my actions were made public?

Answering
YES to
all of these
questions
means the
action is
probably
acceptable.

But any **NO** or “I’m
not sure” response is
a signal to stop and
seek guidance before
proceeding. It is
always appropriate –
in any situation, under
any circumstances –
to ask for help.



Your Responsibilities

We Believe ...

That everyone is accountable for their actions.

You have a responsibility to:

- Live our core values – let others see, through your actions, that integrity matters to you.
- Follow the laws, regulations, policies and procedures that apply to your job, including any country-specific requirements. Attest that you have read and understand our Guide and will comply with it in your daily activities.
- Report concerns about any conduct that you believe is unethical or illegal.
- Cooperate fully and honestly in any internal investigations of potential misconduct.
- Maintain confidentiality regarding all investigations and facts related to these matters.

The Responsibilities of Leaders

We Believe ...

A positive, ethical tone starts at the top.

If you are a manager, we rely on you to:

- Conduct business with integrity, and serve as an example, who employees look up to.
- Discuss with employees why it is important to comply with the Guide.
- Create the kind of environment where employees feel comfortable sharing concerns. Make sure they know about the Integrity Hotline and other resources available to them.
- Guide employees and those who act on our behalf through issues, and take prompt action if misconduct occurs.
- Never respond in a retaliatory manner and report any concerns regarding retaliation by others.



“...let others see, through your actions, that integrity matters to you.”



Asking Questions / Sharing Concerns

We Believe ...

It is not always easy to speak up about misconduct, but it is always the right thing to do.

If you see or suspect misconduct, start by speaking with your manager. He or she is in the best position to understand and take appropriate action.

If you feel uncomfortable speaking with your manager, or if you have already spoken to your manager and no action has been taken, there are other resources available to help you. You may contact another member of management, your local Human Resources representative, or a Legal or Compliance Department representative. Contact information for these and other resources is detailed in the [Where to Go for Help](#) section of our Guide.

Whatever reporting method or resource you use, you can be certain that your concern will be taken seriously and handled promptly, professionally and with the highest degree of confidentiality possible. The information you provide will be shared only with those individuals with a need to know.

Our Integrity Hotline offers another reporting option.

Available 24/7, you may contact the Integrity Hotline via phone or online to share your concerns or to ask questions. If you contact the Hotline:

- You may choose to identify yourself or – where permitted by law – remain anonymous.
- You may report your concern via customized Web form or communicate with an interview specialist who will document your concern. Calls are never recorded or traced, and both calls and online reports are handled through a secure third-party website that is specially designed to protect confidentiality.
- After you complete your report, you will be assigned a unique code called a “report key.” Write down your report key and password and keep them in a safe place. After 14 business days, use your report key and password to check your report for feedback or questions.
- The information you provide will be relayed to Mallinckrodt for appropriate follow-up.

No Retaliation

We Believe ...

No one should fear retaliation for speaking up.

Mallinckrodt does not tolerate any form of retaliation against anyone who comes forward with a concern in good faith. If you believe you have experienced retaliation as a result of raising a concern, participating in an investigation or other protected activity, contact your Human Resources department representative, a Legal or Compliance Department representative or the Integrity Hotline.

Did you know?

Retaliation can take many forms, including:

- Passing someone over for a key project assignment
- Denying someone a raise or promotion, when merited
- Giving a negative performance evaluation, when it is not warranted



We Understand Our Responsibility to Others

We build on our good reputation by preserving the trust people place in us and maintaining strong relationships with our stakeholders. Together we make a difference.

In this Section:

- Protecting Privacy
- Maintaining Safety and Quality
- Innovating with Integrity
- Interacting with:
 - Patients and Consumers
 - Healthcare Professionals
 - The Government
 - Vendors and Suppliers



Protecting Privacy

We Believe ...

We have an obligation to protect the privacy of the information that is entrusted to us.

At Mallinckrodt, we are committed to compliance with the data privacy and security laws of the countries in which we operate (including, but not limited to, the Health Insurance Portability and Accountability Act (HIPAA) in the United States and the EU Data Protection Directive and its follow-on General Data Protection Regulation (GDPR)).

Your job may bring you into contact with personal information or sensitive personal information about patients, consumers, coworkers or other third parties – this information should be treated as confidential information and used or disclosed only for legitimate business purposes.

Know the kind of information considered “personal information” (PI).

Recognize that it can come in a variety of formats, such as paper copies, electronic communications, audio recordings, video recordings, photographs and oral conversations.

Comply with our policies and all applicable data privacy and security laws as they relate to its collection, use, management, storage and protection. Grant access only to those who are authorized to know the information, need it to perform their jobs and are obligated to protect it.

There are additional rules for “Sensitive Personal Information” (SPI).

SPI is information relating to racial or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual orientation, gender identity or criminal convictions. We maintain only SPI which has a business purpose and is necessary for carrying out Company business.

If you have questions or concerns about how to handle PI or SPI or suspect that this type of information has been inappropriately disclosed, contact your Human Resources representative, a Legal or Compliance Department representative, the Chief Information Security Officer (CISO), the Information Security Department, the Privacy email box at privacy@mallinckrodt.com or the Integrity Hotline.

Do Your Part

Keep private information private.

- If you have authorization or consent, collect and use the minimum amount of personal information necessary – and keep it only as long as necessary – to meet the business need.
- Follow our policies when sending, storing or transferring information to ensure that any contractual requirements are met and appropriate safeguards are in place.
- Make sure that business partners and other third parties working with us or on our behalf understand their obligation to protect PI and SPI.
- Know and follow our record retention procedures and schedule.



Personal information (PI) is ...

Information that can directly or indirectly identify an individual, such as:

- A name
- Employee number
- Personal identification number (such as a tax ID number or Social Security number in the United States)
- Genetic information
- Credit card number



Maintaining Safety and Quality

We Believe ...

In uncompromising quality when it comes to our products.

We put the best interests of our customers and patients first and are dedicated to high standards of product quality and safety in all of our manufacturing processes and procedures. We comply with all applicable regulatory requirements and maintain a strict quality management system. Take personal responsibility for the work you do, meet or exceed all of our quality and safety requirements and always seek out ways to deliver on our mission to improve lives.

Immediately report any safety or quality issues.

If you see, suspect or become aware of a situation that is unsafe, does not comply with our quality policies or procedures or could adversely affect our products, you have a responsibility to immediately bring it to the attention of your manager, quality professional or other appropriate internal resource. Your prompt action allows us to work toward addressing and correcting the issue before it presents a risk to those we serve.

Also report any undesirable experiences associated with our products.

Adverse Events (AEs) and Product Quality Complaints (PQCs) provide us with critical information about our products that we can use to alert patients, medical professionals and regulatory authorities. Reports also provide us with data we need to continually improve our products. If, through interactions with friends, family or business associates, you learn of an AE or PQC (including suspected counterfeiting or tampering), you must report this information within 24 hours. See the [Where to Go for Help](#) section of our Guide for contact information.

Do Your Part

Insist on quality.

- Make product quality and safety a priority – remember that we are accountable to regulatory agencies, customers and patients.
- Leverage Mallinckrodt's structure, systems, resources, materials, equipment, tools and training to keep yourself and others safe.
- Report any issue that could compromise the quality or safety of our products.





Innovating with Integrity

We Believe ...

In building on our reputation as an industry leader.

We are constantly innovating to discover new solutions and to improve the efficacy, safety and health benefits of existing products. Integrity is key to our research and development efforts. We work to ensure the safety – and protect the rights – of those who participate in clinical trials, and we observe the highest ethical standards in our research, complying with all applicable laws, regulations and industry standards.

Observe high standards in clinical research.

All of our clinical research must be designed to meet a legitimate unmet medical need and scientific question. Data from studies must be accurately and completely recorded and reported to regulatory agencies in accordance with our legal requirements.

Our research efforts follow rigorous policies and procedures based on widely recognized industry standards such as Good Laboratory Practices

(GLP) and Good Clinical Practices (GCP) as well as applicable laws and regulations. Researchers are trained on study protocols, and trials are conducted under the supervision of an Independent Research Board (IRB).

We obtain informed consent from participants in advance of our studies, advise them of the nature and purpose of our research and protect them from unreasonable risk. We also ensure that clinical research data is truthful and accurate and that it is collected and maintained in compliance with applicable data protection laws.

Do Your Part

If you are involved in research and development:

- Always keep the safety of patients first.
- Know and fully follow our policies and industry standards.
- Ask questions anytime you are unsure of the proper course of action.



“...we observe the highest ethical standards in our research ...”



Interacting with: Patients and Consumers Healthcare Professionals The Government Vendors and Suppliers

We Believe ...

Ethical, transparent relationships benefit all of our stakeholders and fuel our success.

We interact with a broad cross-section of people. We want every interaction to inspire trust in our Company and our products – regardless of your role, your responsibilities or location, make sure you always operate with integrity, honesty and transparency.

Put patients first.

Remember that managing complexity and improving lives are at the core of who we are as a Company. Compliance with all applicable laws and regulatory requirements (in terms of developing, manufacturing, distributing, advertising and promoting our products) is an expression of that commitment.

When it comes to healthcare professionals, we share the same goals.

Promote patient welfare by maintaining positive business relationships with healthcare professionals.

Comply with the law and our policies, and make sure that interactions are professional and serve a legitimate business purpose.

All information about our products must be accurate and truthful and strictly follow governing laws and regulations and Company policies related to how we promote our products or otherwise provide information to healthcare professionals. Information about approved uses, safety issues, contraindications and side effects of our products must be provided in accordance with the Company's policies. Never interfere – or even give the appearance of interfering – with a healthcare professional's independent judgment, and never offer bribes or improper inducements.

Many countries, like the United States, have strict laws which prohibit you from giving something of value to a healthcare professional with the intent to influence the recommendation or purchase of our products.

Similarly, it is illegal to submit or cause others to submit a false claim for payment from the U.S. government based on inaccurate or inappropriate product information.



A healthcare professional can be:

- A doctor or nurse
- A pharmacist
- Anyone who administers, prescribes, purchases or is in a position to influence the use of our products

“Value” is broadly defined and can include:

- Speaker fees
- A consulting engagement
- Gifts
- Free items
- Charitable contributions
- Sponsorships



Be honest and transparent with government officials.

If your work involves sales to the government, make sure you know and follow all of the procurement, sourcing, due-diligence and other requirements that relate to this work.

We operate in a highly regulated industry and comply with laws that require us to provide full, fair, accurate, timely and understandable reports and disclosures to government entities.

We also cooperate with government investigations and audits. If you are contacted by a government representative, immediately contact your manager or a Legal Department representative so that we may respond promptly to the inquiry. If you are directed to respond to a request from a government official, do so honestly, accurately and truthfully. Never conceal, destroy or alter documents, make misleading statements or interfere with a government inspection or investigation.

If you interact with a government official, remember that there are very strict rules that govern what we may give to – or receive from – government officials. Obtain approval in advance before offering (directly or indirectly) anything of value to a government official, to avoid even the appearance of something improper.

Hold our vendors and suppliers to our high standards.

We select business partners based on their ability to meet our business needs, considering such factors as quality, pricing, experience and reliability. If your job involves working with vendors or suppliers, you have a responsibility to conduct due diligence before making a

selection and to monitor their performance to ensure they are meeting their contractual obligations. You should seek the advice of the Legal and Procurement Departments and make sure you follow all procedures prior to engaging third parties.

We could be responsible for the acts of third parties who work on behalf of our Company, so do your part to ensure that our partners understand our Guide, our policies and our Mallinckrodt Supplier Code. Speak up if you see or suspect that they are not meeting our standards.

Do Your Part

Promote positive business interactions.

- Do not provide or accept anything of value when dealing with government officials.
- Foster relationships that are built on mutual trust and respect.
- Be fair and honest in every interaction; avoid any situation that could present a conflict of interest or a violation of our Guide.
- If your job requires you to interact with a healthcare professional, be sure you understand what is appropriate – and what is not. Seek advice if you are ever unsure of your obligations.
- If your job requires you to respond to requests for information from government and regulatory agencies, be accurate.
- If your job requires you to partner with suppliers, vendors and other third parties, honor our contractual obligations and require that they, in turn, honor theirs.



I contacted a doctor to see if she would agree to speak at an upcoming event. She indicated that she would be delighted to speak if a “gift bag” was provided. That seems inappropriate – is it?

Yes, it is not appropriate. The “gift bag” has a value associated with it, and in this case, could be viewed as an inducement to the doctor in order to influence prescribing. You should tell her that you are unable to provide any free items in exchange for her participation in the event.



We Do the Right Thing

We honor the commitment we made more than 150 years ago – integrity is at the heart of everything we do. Our responsibility to our many stakeholders, including our financial stakeholders, is built on the integrity of our dealings.

In this Section:

- Following Industry Regulations
- Competing Fairly
- Ethical Marketing and Advertising
- Preventing Bribery
- Preventing Insider Trading
- Guarding Against Fraud
- Maintaining Financial Integrity
- Preventing Financial Crimes
- Conducting Trade Around the World



Following Industry Regulations

We Believe ...

In innovating in a way that aligns with industry laws and regulations.

We operate in a highly regulated industry and comply with the international, national and local requirements that apply to our work. We also comply with codes of conduct that govern our industry including (but not limited to) Medtech and EFPIA in Europe, PhRMA and AdvaMed in the United States, Medicines Australia and Innovative Medicines and Medec Canada. Collectively, these rules and regulations address not only how we research, develop and manufacture our products, but also how we promote, market and distribute them.

Compliance with these requirements not only preserves the reputation we have earned as an ethical Company, but more importantly, protects the health and safety of patients and consumers.

What if there is a conflict between the requirements? The best strategy is to follow the one that is the most restrictive, but remember: at any time, in any situation, it is always appropriate to ask for help.

Do Your Part

Preserve our commitment to operating legally in every location where we do business.

- Comply with all applicable requirements that apply to our business and your individual job.
- Never forget that the decisions you make every day have an impact on our Company and the people who place their trust in our products.



Did you know?

Because we operate in the United States, we also comply with U.S. healthcare laws including:

- The Anti-Kickback Statute
- The False Claims Act
- The Prescription Drug Marketing Act (PDMA)
- Government Pricing and Contracting laws and regulations
- Health Insurance Portability and Accountability Act



Competing Fairly

We Believe ...

In offering the very best products and letting the marketplace decide.

A thriving marketplace benefits everyone. We follow the antitrust and competition laws in the countries where we operate and do not engage in any activities that unfairly limit free trade. We do not exchange any information or enter into any agreements with competitors, suppliers or other third parties – whether formally or informally – that could restrict free and open competition.

Avoid even the appearance of anything improper, and if your job involves participation in trade association or industry-setting groups, be careful. Avoid any discussions about topics that could be considered competitively sensitive.

Deal fairly. Always be truthful about the quality, features and availability of our products and never make false statements about the products our competitors offer.

Participate fairly in the bidding process.

Bid rigging happens when competitors manipulate bidding to limit fair competition. It can take the form of comparing bids, agreeing not to bid, knowingly submitting a noncompetitive bid or agreeing on who

will submit the winning bid. If you are involved in the bid preparation process, do not participate in any form of bid rigging. Always comply with the law and our policies.

What about gathering competitive information?

Gathering information about our competitors is a normal business practice, but make sure you do it appropriately and lawfully. Obtain competitive intelligence from public sources. We win business based on the merits of our products, never by deceiving others, misrepresenting who we are or abusing confidential information.

Look at the big picture.

Antitrust and competition laws are complex and differ from country to country, but are all designed to promote competition. Entering into tying, reciprocal or exclusive dealing agreements with customers or suppliers, limiting the territories where a product can be resold or leased, charging different prices to competing customers – these and other similar practices may raise issues under the law. Seek help from a Legal Department representative anytime you have a question about how antitrust or competition laws apply to a particular business situation.



“... if your job involves participation in trade association or industry-setting groups, be careful.”

“Public sources” include:

- Information presented publicly at trade shows or conferences
- Published industry surveys conducted by reputable sources
- Information generally available (e.g. internet searches, public documents)



Do Your Part

Compete fairly.

- Refrain from discussions with competitors (or potential competitors) about pricing, costs, production, products and services, bidding practices, sales territories, distribution channels, terms or conditions of sale, market segments or marketing strategies.
- Never exchange information or enter into an agreement to:
 - Set prices on our products and services
 - Divide geographies, markets or customers
 - Prevent another company from entering the market
 - Participate in any form of bid rigging
 - Refuse to deal with a customer or supplier for improper reasons
 - Boycott another company



What if I'm at a trade association meeting or other industry gathering, and the conversation turns to an anti-competitive subject?

Make it clear that you won't participate in any discussions about competitive matters, announce why you are leaving to ensure there is no ambiguity about your intention, then promptly leave and report the incident to a Legal Department representative.





Ethical Marketing and Advertising

We Believe ...

In winning business on the strength of our products.

We pride ourselves on creating the highest quality pharmaceuticals – products that bring value to the global healthcare industry. Strict laws and regulations govern how we can interact with the healthcare community when we bring these products to the marketplace.

In marketing, promoting and advertising our products, we have an obligation to comply with all applicable legal requirements and provide accurate, fair and balanced information, consistent with the law, the standards of Good Promotional Practices and local codes internationally.

We promote responsibly.

Never mislead or omit critical information, and never use self-made materials to promote our products. Any claims about product attributes we make must be backed by facts, and written and visual depictions must accurately reflect the products we offer.

We also make sure that promotional materials reflect on-label use and conform to any legal requirements (including those of the Food and Drug Administration in the United States).

In certain countries, like the United States, statements and materials related to our products are limited to those that have been approved in accordance with local procedures by the Company promotional review committee at headquarters.

We understand the rules about samples and follow them.

Under certain circumstances, we may provide samples to authorized prescribers to enable them to assess the response to the product in individual patients. If your role permits you to provide samples to healthcare providers, take care to follow our policies and the law.

Make sure that you are transparent about being a Mallinckrodt employee, that providing the sample is appropriate and that you are not distributing samples in order to influence decisions about our products.

Do Your Part

Keep advertising and marketing practices honest.

- Keep statements and claims about our products accurate based on Company-approved claims.
- Do not win business through deception.
- Avoid negative statements about competitors.





Preventing Bribery

We Believe ...

Integrity in business dealings is the best road to success.

Payments to gain an improper advantage are wrong. This includes payments by our employees or anyone working on our behalf. Never offer, give, solicit or accept bribes or kickbacks in the form of cash or anything else of value. Ensure that all financial transactions are accurately recorded in Company accounting and financial records.

We follow the law everywhere we do business. It is improper to use a third party to do something our Company cannot do – including paying bribes. Follow our due diligence procedures when working with third parties to ensure that our representatives are of the highest quality and integrity. Always hold partners to the same strict standards you must follow.

Do Your Part

Maintain integrity.

- Properly record all payments in accordance with Company procedures.
- Win business in an ethical and legal way.
- Refuse to give, accept or solicit anything of value in exchange for a business advantage.
- If you are ever asked to make a payment that you are unsure of, ask before you act!



An international deal I'm making hinges on a small, non-routine payment of US\$20 to a local government official. If I have the money in my wallet, can I go ahead and make the payment?

No. We do not allow payments like this for any reason. Even if you can make a payment out of your own funds, it is still improper. All transactions must be properly recorded. If you are ever solicited for an improper payment, or you find out another employee or a business partner has made, solicited or accepted an improper payment, let your manager or a Legal Department representative know right away. If you are ever unsure about a payment, seek guidance before you make it.



Preventing Insider Trading

We Believe ...

In fair securities trading practices.

In the course of your job, you may be privy to material, nonpublic information about our Company, customers, suppliers or acquisition targets. Strict laws regulate what you can do with that information, and penalties can be severe, including criminal prosecution in certain countries.

Never buy or sell stock or any other securities of any company while in possession of material, nonpublic information concerning that company. This could mean information related to Mallinckrodt or any other company you have dealings with. Also, you should not tip this information to anyone else or recommend they buy, sell or hold stock or securities based on this information.

Directors and senior-level employees have additional requirements relating to trading our securities. If you ever have questions, stop what you are doing and ask a Legal Department representative for guidance.

Do Your Part

Keep trades ethical and legal.

- Do not trade on material, nonpublic information.
- Do not provide that information to others.
- Follow the law as well as our policies and seek guidance.

Material information is ...

Information a reasonable investor would consider important in deciding whether or not to buy, sell or hold securities. Examples include, sales and earnings data, news of acquisition or divestiture, clinical trial results, regulatory rejection or approval.

Nonpublic information is ...

Information not generally available to the public or that the public has not had adequate time to absorb.



Guarding Against Fraud

We Believe ...

Dishonesty has no place
at Mallinckrodt.

Fraud is cheating, tricking, stealing, deceiving or lying. We do not tolerate this on any level from any employee. In certain countries, fraudulent actions or intent can lead to disciplinary action, including dismissal, and possible legal action.

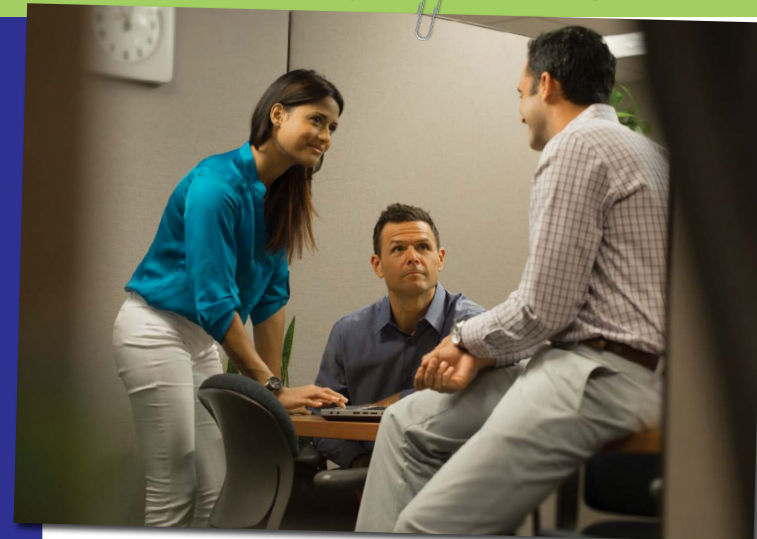
Do Your Part

Maintain honesty and integrity at all times.

- Do not engage in deceit or theft.
- If you know of or suspect fraud, speak up.

Examples of fraud include:

- Submitting false expense reports
- Forgery
- Misappropriating assets
- Misusing Company property
- Inflating sales numbers
- Intentionally making inaccurate entries in Company records





Maintaining Financial Integrity

We Believe ...

In truth and honesty in all financial matters.

Accurate, timely financial records help us fulfill our obligations to financial stakeholders, governments and the public. Follow our internal controls and any applicable laws, for example the Sarbanes-Oxley (SOX) Act in the United States, as well as any applicable financial reporting standards, such as U.S. Generally Accepted Accounting Principles (GAAP).

Completely and accurately record all business transactions according to our policies, and ensure that financial documents fairly represent all relevant information. Never establish or maintain any unrecorded cash funds or other asset accounts. If you believe funds are being misused or records are not accurate, immediately contact a Legal Department representative.

Manage records appropriately.

Follow the Company's records retention procedures and schedule, and know how data is stored and retrieved. We rely on you to properly document transactions and to be accountable for entries and records for which you are responsible. If our Company is subject to an audit, comply fully and accurately, in accordance with our policies.

Proper record retention is essential to operate effectively. This means you should not destroy, alter or remove from the workplace digital or paper documents other than exceptions permitted by our records management rules. Communicating false or derogatory information, or unauthorized altering or destroying of documents, can lead to disciplinary or legal action.

Periodically, our Legal Department may send out a notice requiring you to maintain documents due to litigation. You are obligated to comply with that requirement and retain these documents.

Do Your Part

Maintain clarity and accuracy at all times.

- Make accurate statements – never misrepresent, mislead or misinform.
- Strive for precision in transactions and communications.
- Know and follow our records retention procedures and schedule.



Communicate with clarity.

- Keep communications truthful and forthright.
- Never mislead or misinform.
- Notify customers and suppliers of errors and promptly correct them.



Preventing Financial Crimes

We Believe ...

Criminals should not use our Company to further illegal activity.

As we have seen throughout this Guide, financial crimes can take many forms; Mallinckrodt is committed to conducting business in a way that prevents the use of our business transactions by those who might abuse them or use them to commit crimes, so we comply with anti-money laundering laws, tax noncompliance laws, anti-terrorism laws and other similar laws in all countries where we operate.

Money laundering is a process where funds generated through criminal activity – such as terrorism, drug dealing, tax evasion, human trafficking and fraud – are moved through legitimate businesses in order to hide their criminal origin.

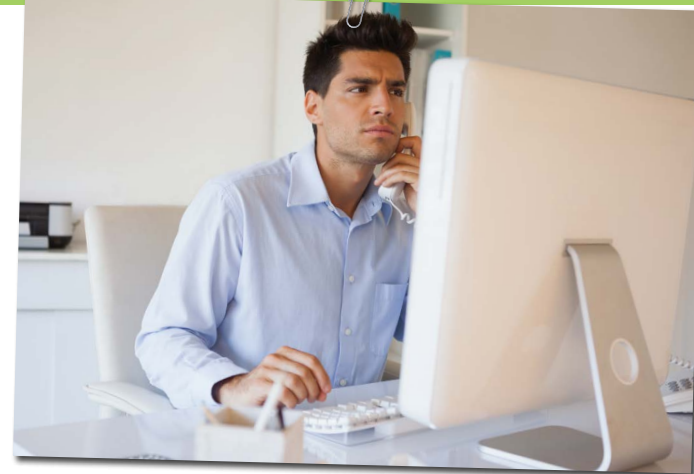
Across the globe, laws against tax noncompliance, including criminal tax evasion, can take many forms,

and what may be legal in one country may not be legal in another. So watch for unusual payment terms or payments from unrelated accounts. Take the time to know your customers and business partners and understand their use of our products in order to prevent illegal activity. Report suspicious transactions to your manager or a Legal Department representative.

Do Your Part

Keep our business clean.

- Do your due diligence on third parties and customers.
- Be proactive when it comes to spotting financial transactions that might signal a problem.
- If you see or suspect an activity or transaction that deviates from our normal process, speak up.





Conducting Trade Around the World

We Believe ...

In complying with all applicable import, export and trade compliance laws of all countries in which we do business.

Mallinckrodt manufactures, distributes and trades our products all over the world. Trade violations can have serious consequences, so we comply with the laws wherever we do business.

You help us stay compliant with trade laws and policy when you:

- Declare accurate and timely information to customs and other government authorities.
- Comply with customs laws when hand-carrying commercial goods.
- Create and retain appropriate documentation for cross-border transactions.
- Conduct screenings to ensure exports comply with export laws, prohibited-trade lists, sanctions and embargoes against certain countries including Iran, North Korea, Syria and Cuba.
- Obtain required export documents, licenses and authorizations.

- Communicate and reinforce our guidelines and global trade compliance policy to employees and customs agents.
- Monitor and report boycott activity to the Global Trade Compliance Department.

Do Your Part

Make global trade compliance your local priority.

- Comply with our policy, import and export laws wherever we do business.
- Secure proper trade documentation and licenses prior to engaging in import and export activities.
- Know your customers and the countries in which you can and cannot trade.
- Report any red flags to the Global Trade Compliance Department.
- Champion ethical action globally.



A customer placed an order and said she needed the product “right away.” When I screened her business, I saw that it had ties to an embargoed country. When I asked her about it, she insisted it was an error and that she had no ties to the prohibited country. She even told me the specific healthcare facilities where the product would be used, and they are all in a country where we routinely ship products. Can I go ahead and fill the order?

Not yet. Although you took a good first step in the screening process, there is more work to do. Do not simply take the client’s word that she has no ties to the embargoed country – her company might. Follow our due diligence procedures and trade compliance policies with customers, and seek guidance from a Legal or Global Trade Compliance Department representative if you’re ever unsure what to do.



We Promote an Ethical Workplace

We take pride in the culture we have created at Mallinckrodt. We come to work each day driven to improve people's lives in the best way possible – with integrity.

In this Section:

- Celebrating Diversity
- Maintaining a Respectful Workplace
- Maintaining a Safe Workplace
- Observing Fair Labor Practices



Celebrating Diversity

We Believe ...

Every employee has a role in making our Company a more rewarding place to work.

We expect all employees to treat one another with respect and dignity. Equal opportunity and fair treatment extend to all employees.

As a global Company, we draw on the diversity of our broad workforce and prohibit discrimination.

We are also committed to providing necessary reasonable accommodations. We comply with applicable civil rights, human rights and environmental and labor laws.

These principles apply to all employment decisions, including: recruiting, hiring and training; promotions, pay and benefits; and transfers, workforce reductions and terminations.

Do Your Part

Preserve dignity. Maintain respect.

- Honor our commitment to a workplace that values diversity.
- Avoid discrimination. Keep employment decisions fair.



We do not discriminate against any individual on the basis of any protected categories including:

- Age
- Race, color or national origin
- Religious creed
- Marital status
- Disability
- Genetic information
- Military and veteran status
- Political activities or affiliation
- Sex or gender identity
- Sexual orientation



Maintaining a Respectful Workplace

We Believe ...

In a professional work environment for everyone.

We are committed to providing a workplace free from discrimination, harassment and intimidation. We expect employees to promote teamwork and excellence by respecting one another and those with whom we do business.

Be respectful.

Employees have a right to a workplace free of hostile, offensive or intimidating conduct. Unwelcome conduct – whether verbal, physical or visual – that is based on a protected category, is never permitted.

We also do not tolerate sexual harassment in any form, against any person, regardless of whether it is directed at a person of the same or opposite sex. Sexual harassment includes unwelcome conduct toward another individual on the basis of the individual's sex or making submission to sexual conduct a condition of employment.

Keep in mind: this policy applies to both work-related settings and work-related activities outside the workplace.

Avoid abusive behavior.

Avoid using abusive language or engaging in physical aggression. Never intimidate or harass anyone in the workplace, for any reason.

We hold business partners to the same standards.

Our harassment policy extends beyond our employees and applies to outside vendors, customers, professionals and anyone else with whom we work.

Take action.

If you believe you have been subjected to discrimination or harassment (or suspect that someone else has), you are encouraged to speak directly to your manager, your Human Resources representative or any member of the Legal and Compliance Department. Of course, the Integrity Hotline is always available. See the [Where to Go for Help](#) section of our Guide for contact information.

Do Your Part

Keep our workplace safe and professional.

- Do not harass anyone in the work setting, for any reason.
- Avoid sexual harassment in all situations.
- Keep language and behavior professional and appropriate.
- Maintain a high standard of ethical conduct in out-of-office settings with coworkers and others.
- Hold business partners to the same high standards of conduct.



My coworker likes to tell jokes about people of different races.

And sometimes, when we're at after-hours functions, she will tell the male employees how nice they look and make sexual jokes. I don't find it particularly offensive, because I know humor is a big part of who she is, but I'm not sure how others feel about it. Should I just ignore it?

No. Even if you are not offended, others might be. And even if others stay quiet or go along with the jokes, it doesn't mean they approve of her behavior. You should share your concerns with a manager or your Human Resources representative so that we can address the situation and keep the workplace free of harassment.



Your intent does not matter: If you intimidate or demean others, even if it was intended as a "joke" or "no harm" was intended, it may be in violation of this Guide.



Maintaining a Safe Workplace

We Believe ...

In a safe, healthy workplace for everyone.

Everyone deserves to work in a safe and healthy workplace. However, maintaining that workplace is every employee's responsibility.

Keep our workplace substance-free.

Substance abuse can pose a serious threat to the health, safety and productivity of our Company, our customers and our coworkers. Our Company maintains a drug-free and alcohol-free workplace, and this standard:

- Applies to all Mallinckrodt locations worldwide.
- Applies to employees, vendors, customers and guests.
- Prohibits the use or possession of alcohol, illegal drugs or other controlled substances in the workplace.
- Prohibits being under the influence of alcohol, illegal drugs or any other controlled substance while on the job. The only exception is prescription medication for medical treatment.

There may be some instances where drinking alcoholic beverages in connection with Company events or while conducting Company business is permitted. Under such circumstances, underage drinking, intoxication and excessive drinking are prohibited.

In countries where it is allowed by law, the Company reserves the right to test applicants and current employees and contractors for illegal drugs and alcohol or misuse of prescription drugs.

A safe, healthy workplace is our priority.

We require that every Mallinckrodt business have an active safety program in place. You should not engage in behavior that puts you or anyone else at risk. Follow all safety policies and regulations, wear appropriate personal protective equipment and report any unsafe condition (including accidents and near misses) immediately.

Workplace violence is everyone's concern.

Violence has no place at our Company. This includes threats of violence against any employee or business partner. We prohibit the possession of weapons or other dangerous devices at all times, on Company property or on the property of our customers. If you are aware of violence or potential violence in the workplace, or any threat to an employee or anyone associated with our business, report it immediately.

Do Your Part

Ensure your safety and the safety of others.

- Keep drugs and alcohol away from the workplace.
- Follow all safety procedures – no exceptions, no shortcuts.
- Report unsafe conditions, accidents and near misses to your manager immediately.
- Report violence or threats of violence immediately.



I noticed someone at my workplace performing a task that placed her at risk of harm and had the potential for jeopardizing the safety of other people in the area. It's really not my responsibility to say something, and doing so would only mean that I am a troublemaker, right?

Wrong. Allowing the risky situation to continue could not only cause injury, it could also mean noncompliance with local labor and occupational safety regulations. Each Mallinckrodt employee has an obligation to recognize and report to their manager any situation that places employees or members of the public at risk.



Observing Fair Labor Practices

Everyone has the right to dignity, and we honor that right in our Company and throughout our supply chain. We do not tolerate forced or child labor in our Company or in the companies with which we work. No exceptions.

Make a global commitment to dignity and respect.

We strive to be a good global citizen and socially responsible community partner.

We're committed to the responsible sourcing of conflict minerals. We follow laws that require disclosure of their use, and we encourage everyone we do business with to adopt similar standards. In this respect, the Company has instituted a comprehensive conflict minerals policy to ensure the fair trade of mineral resources.

Our Company also has an obligation to provide a clean, safe working environment free of human rights violations. At Mallinckrodt, ethical behavior means no child or compulsory labor, human trafficking or slavery, unsafe or hazardous conditions

or environments, or any behavior that does not maintain human dignity and respect. Ethical behavior also includes paying a fair wage.

All employees should promote dignity and respect in the workplace, even if local laws permit actions that do not meet our standards. We also expect our suppliers and business partners to maintain these high fair labor standards. We expect full compliance with the Mallinckrodt Supplier Code.

Do Your Part

Preserve human rights.

- Follow all applicable labor and employment laws.
- Report child labor, slavery and human trafficking immediately.
- Hold business partners to a high standard.





We Safeguard Our Company

From our resources to the information we use each day to solve complex challenges, we protect what is ours.

In this Section:

- Protecting Information
- Protecting Assets
- Avoiding Conflicts of Interest
- Knowing the Rules About Gifts, Entertainment and Travel
- Speaking on Behalf of Mallinckrodt



Protecting Information

We Believe ...

In protecting the confidentiality of Company information.

Information is one of our most valuable assets. The confidential, proprietary and restricted information we use in our work helps us maintain our competitive edge. We handle our information with care and protect it from misuse and unauthorized disclosure.

What information should be protected?

You have a responsibility to protect any information that is not available to the public and could harm our Company or benefit our competitors if it is exposed. Such information could include confidential or proprietary business information such as business forecasts, acquisition plans, contract terms or intellectual property and restricted information such as scientific and technical knowledge and know-how.

Did you know?

Your obligation to protect our information does not end if you leave Mallinckrodt. Even if you decide to leave, you still have a responsibility to protect our information.

Personal information (PI) such as names, phone numbers, addresses and any other information that can be used to identify a person is also confidential information. See [Protecting Privacy](#) for more information.

We also respect the confidentiality and proprietary information of other companies that have arrangements with our Company.

If you are granted access to this information through authorized means, only access the information you need to do your job. Also, only share it with individuals who have been authorized to have it and have a need to know the information. If you are ever unsure if information is confidential, seek help.

Be aware of your surroundings when discussing Company business and avoid doing so in public settings such as airports, elevators and restaurants.

Do Your Part

Protect our information.

- Comply with our policies and applicable law.
- Avoid discussing confidential business information where you can be overheard. Never leave it where others can see or access it.
- Use it only for legitimate business purposes.
- Follow our internal systems and controls for securing information.
- Be responsible when using social media.
- Immediately report any suspected data breaches to the Cybersecurity Team. See the [Where to Go for Help](#) section of our Guide for contact information.



A coworker accidentally sent me an email containing personal information about some of our customers. I am not authorized to have the information she sent. What should I do?

You should report the issue right away. Sending our customers' personal information to someone not authorized to have it could cause harm to those customers and our Company's reputation. Do not distribute it further.



Protecting Assets

We Believe ...

In making sure you have everything you need to inspire your work.

Mallinckrodt places a great deal of trust in us to work responsibly, use good judgment and safeguard Company assets. Our assets include the information and physical and intellectual property we use to perform our jobs. We all share a responsibility to protect all of our resources from damage, loss, theft, fraud, waste and unauthorized use.

Protect physical assets.

Physical assets include things like financial resources, office supplies, tools and vehicles. We expect you to treat our physical assets with care and use them for business purposes. Be sure to store them safely to prevent misuse, tampering and theft. Let us know if any of our assets are damaged, defective or need repair.

Use technology resources responsibly.

Our computers, phones, internet and systems are important to advancing our work. While occasional personal use of these assets is permitted, use good judgment to minimize the use of Company resources. Never use our resources to send anything intimidating, obscene or discriminatory. Where allowed by law, anything created, stored, downloaded, sent or received using our systems is Company property and can be reviewed by us at any time.

Safeguard intellectual property.

Intellectual property is our knowledge base and includes

things like our brand, logos, trademarks, patents, copyrights, ideas and our name. Respect our intellectual property and never disclose it to a third party without approval.

Know that we also respect others' intellectual property and never misuse or infringe on the intellectual property rights of any third party. Also, be aware that any technical innovations or enhancements, discoveries or system designs that you design or conceive of as a Mallinckrodt employee belongs to Mallinckrodt.

Do Your Part

Be a good steward of our resources.

- Guard against misuse, damage, theft, loss and abuse.
- Use them appropriately and for business purposes.
- Keep valuable assets – such as laptops – physically and electronically secure.
- Prevent viruses and downtime by only installing authorized software and never connecting unapproved devices to Company-issued computers.
- Change passwords often and never share passwords with others.
- Be cautious when opening attachments from suspicious senders.
- Manage Company resources responsibly.
- Protect our confidential business information and personal information. See [Protecting Information](#) to learn more.



I noticed that a coworker occasionally takes home things like flash drives and office supplies. Since it does not seem to be causing a problem, do I need to do anything?

Yes. You should let your manager know about the situation. Taking things that belong to the Company is theft and violates our Guide and our values.



Avoiding Conflicts of Interest

We Believe ...

In being loyal and doing what is best for Mallinckrodt.

We want you to act and make business decisions in the best interest of Mallinckrodt. When your personal interests interfere with your judgment, it can create a conflict of interest. Even the appearance of a conflict can harm our Company. We work to avoid conflicts of interest and refrain from using our position for personal gain.

While it is not possible to list every situation that can present a conflict, there are some instances where they typically arise:

- **Outside activities** – working a second job or participating in an outside activity that competes or potentially interferes with the work you do at Mallinckrodt.
- **Serving on Outside Boards** – serving as a director, an officer or a consultant with any company that does business with Mallinckrodt (including service as a volunteer (e.g., an unpaid position).
- **Financial interests** – having a financial interest or having a close relative who holds a financial interest in our competitors, customers, suppliers or vendors.
- **Corporate opportunities** – taking an opportunity for yourself that belongs to our Company or that you learn about through your position at Mallinckrodt.

You should also disclose any situation in which a close relative seeks to do business with the Company. You have a responsibility to ensure impartiality and objectivity and follow Company purchasing policies when making vendor selections. You should recuse yourself from all decisions where a close relative seeks or does business with our Company.

It is important that you avoid situations that can present a conflict and disclose them if they do arise.

Often, conflicts can be managed when promptly disclosed. You are required to provide notice to the Company of an actual or potential conflict of interest as circumstances arise. Notice should be given by completing the conflict of interest form available on Mallinckrodt's internal website and submitting the form to your manager and your local Human Resource representative.

Do Your Part

Avoid conflicts of interest.

- Be alert to situations that can create a conflict and remove yourself from situations that can even appear to affect your decision-making.
- Never accept employment or consultant opportunities with a competitor, customer, supplier or vendor without advance approval.
- Always ask yourself: Am I doing what is best for Mallinckrodt?

“Close relatives” can be:

- Your spouse
- Your (or your spouse's) parents, siblings, children, grandchildren, grandparents, aunts, uncles, cousins, nephews, nieces
- Any individual with whom you share a close personal relationship that may create a conflict of interest



One of my coworkers told me about a new company he is creating to distribute pharmaceutical products. He said that he asked a doctor (who is also one of our customers) to be a co-owner. Isn't that a conflict of interest?

Yes. Your coworker is taking an opportunity for himself that competes with our Company and is soliciting a doctor who he knows by virtue of his position with our Company. You should bring this situation to the attention of your manager or Human Resources.



Knowing the Rules About Gifts, Entertainment and Travel

We Believe ...

In giving and accepting gifts ethically.

While exchanging gifts and offers of entertainment or hospitality is often considered a normal part of doing business, it can create a conflict of interest if you are not careful. When exchanging gifts, entertainment and hospitality, use good judgment and avoid anything that can suggest anything improper.

Follow our policies and the law when exchanging gifts or offers of entertainment or hospitality. Know the difference between acceptable and unacceptable gifts. Understand that strict rules apply when providing anything of value to government officials and healthcare professionals. (See the [Interacting with Health Care Professionals](#) and [Interacting with the Government](#) sections of the Guide.)

Regarding an employee's acceptance of business entertainment or a gift, the following rules apply:

- The value of the business entertainment or gift must be no greater than US\$50 or equivalent.
- The business entertainment or gift should be offered infrequently and unconditionally (no more than twice in a calendar year).
- You must notify your manager that you intend to accept the gift or entertainment.

If the gift or entertainment does not meet these criteria, you must politely refuse or return it.

If you are unsure about whether to accept gifts or entertainment, contact your manager or the Compliance Department.

Certain functional areas have additional requirements. It is your responsibility to determine if your functional area has limitations on gifts or entertainment.

Do Your Part

Know the rules.

- Never accept a gift if it:
 - Violates our policies or the law
 - Could be viewed as being given to influence a business decision
 - Is lavish or expensive
 - Creates a conflict of interest
- If you are offered a gift you cannot accept, politely decline it.
- Seek guidance if you are ever unsure whether or not you can accept a gift.



Occasionally, I have been invited to participate in an annual team-building activity with external third-parties or to attend a celebratory, end-of-year sporting event with vendors. Is participation in these kinds of events allowed under our Company policies?

Requests for attendance at group events like these may be acceptable and may have higher dollar limits but only if approved by an Executive Committee member along with consultation from Procurement.



Speaking on Behalf of Mallinckrodt

We Believe ...

In communicating with one voice.

The things we say can have a powerful impact on our brand and reputation. We want to send a consistent message and ensure that any information shared about our Company is complete, clear and accurate. That is why we only authorize certain people to speak on our behalf.

Be careful when communicating about our Company. Unless you are authorized to do so by the Communications Department, avoid speaking on our behalf. Though your intentions may be good, you could harm our reputation by making statements on our behalf. You could also be causing the Company to violate applicable law if you disclose information that is not already in the public domain.

If you receive a question or request from the media, refer it to the Communications Department. This is also true for requests to publish articles, contribute to blogs or participate in speaking engagements.

Follow our rules when using social media.

Social media offers a great way for staying in touch with friends and family. While we respect your right to use social media, it is important to use good judgment. Know that we never tolerate the use of social media to intimidate, harass or discriminate against fellow employees. Be aware that you are responsible for everything you publish.

Do Your Part

Communicate responsibly.

- Refer all media requests to your business communications representative.
- Do not speak to the media on behalf of the Company without prior approval from the Communications Department.
- Be responsible when using social media:
 - Make it clear that your opinions are your own and not those of Mallinckrodt.
 - Never disclose anything that could violate the privacy of our customers or employees.
 - Follow our policies and applicable laws.
 - Do not publicly speak about our products or disclose other important information about our Company unless the statements and claims have been approved by the Communications and Legal Departments.



A reporter sent me an email asking me a few basic questions, like how many employees we currently have. Can I tell the reporter what I know?

No. Even though the questions seem easy to answer, it is still better to refer the reporter to the Communications Department. He or she will have the most up-to-date information and will be able to provide an accurate response.



We Are Good Neighbors

We strive to make a positive difference in the communities where we work. It is part of who we are as a Company.

In this Section:

- Engaging in Political Activities
- Participating in Charitable Activities
- Protecting the Environment



Engaging in Political Activities

We Believe ...

In respecting your right to participate in the political process.

We understand the importance of supporting causes that are meaningful to you. While we respect your right to engage in personal political activities, you have a responsibility to keep your personal activities separate from your work. Participate on your own time, with your own resources and avoid speaking on our behalf, unless you are invited by the Government Affairs Department to meet or attend an event with a government official on the Company's behalf.

Some U.S. employees are eligible to voluntarily participate in the Mallinckrodt Political Action Committee (MNKPAC), which is the only vehicle through which Mallinckrodt is permitted to contribute to federal and certain state political candidates who share our corporate values and goals.

Never use Mallinckrodt resources or funds to support personal political causes, campaigns or candidates, unless authorized to do so by the Government Affairs Department. Also, know that we never reimburse employees for contributions to parties or individual candidates.

Do Your Part

Follow our policies when engaging in political activities.

- Comply with applicable laws and regulations.
- Get approval from the Government Affairs Department before making a political contribution or engaging in lobbying activities on behalf of our Company.
- Never pressure other employees to make political contributions or support political parties or candidates.
- Never use your Company email address or letterhead to communicate political views without approval from the Government Affairs Department.
- If you receive a question about the Company's position on a political or public policy issue from any source, refer the matter to the Government Affairs Department.



Participating in Charitable Activities

We Believe ...

In being good corporate citizens.

We are proud to give back to the communities where we live and work. As a Company, we provide funding to organizations that promote key areas such as health and wellness, science education and life sciences. Additionally, we provide patient-centric charitable contributions to assist with a number of different medical conditions. We also encourage our employees to get involved in their communities.

Do Your Part

Engage in charitable activities ethically.

- Keep volunteer and charitable activities separate from your work at Mallinckrodt.
- Do not use Company time or resources to support charitable activities unless you have permission to do so.
- Make sure any charitable activity you engage in is lawful and consistent with our policies.
- Never use corporate funds or resources for charitable activities, unless approved by the Government Affairs Department.



My friend started a non-profit and asked me to print some materials for an upcoming fundraiser. Can I use a work printer to print out the materials?

No. You should not use Company resources to support charitable activities without getting approval first.



Protecting the Environment

We Believe ...

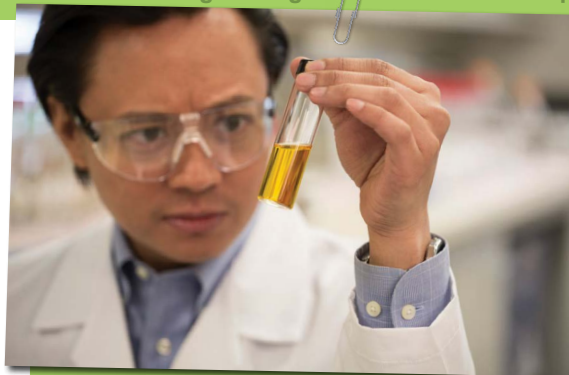
In preserving the earth's natural resources.

We strive to do business in an environmentally responsible manner. As part of our commitment to the environment, we are careful to design products and processes that have minimal environmental impact, while still meeting the needs of our customers.

Do Your Part

Honor our commitment to protecting the environment.

- Follow all applicable environmental laws.
- Strive to do business with third parties who share our values.
- Ensure that any reports we make to government officials or agencies are complete, accurate and timely.
- Conserve natural resources, whenever possible.
- Report environmental concerns to management.
- Be proactive and look for ways to improve the efficiency of our operations.



“We strive to do business in an environmentally responsible manner ...”



I read an article online that mentioned that one of our new suppliers was not disposing of hazardous waste properly. I am a little concerned, but I am not sure it is really any of our business. Should I tell someone?

Yes. We expect everyone we do business with to uphold our high standards. If our suppliers act in ways that violate our commitment to protecting the environment, it becomes our concern too. You should report the situation to your manager, your local Human Resources representative, a Legal or Compliance Department representative or call the Integrity Hotline.



Where to Go for Help

To report a concern. If you have questions or concerns or you are unsure of what action to take, there are a number of resources available to you. You may contact:

- Your manager
- HR Business Partner
- Legal Department
- Compliance Department
at compliance.dept@mallinckrodt.com
- Integrity Hotline, 24/7, at 888-696-9864 (for our international employees, you will need to dial your applicable AT&T direct access number) or www.mallinckrodt.ethicspoint.com
- The Cybersecurity Team 24/7
at 314-654-6550/3900 or
at suspiciousemail@mallinckrodt.com
- The Privacy email box at
privacy@mallinckrodt.com

Contractors performing services for Mallinckrodt should contact their employer, who will contact Mallinckrodt regarding the contractor's concerns.

For individuals in the European Union, please note that Mallinckrodt phone and web services only allow you to report certain issues depending on local law (generally, financial, accounting and auditing matters). Should you wish to report other matters, please contact your local management, Human Resources or the Legal Department.

In countries where it is allowed by law (such as the United States), reporting is not optional. If you suspect that unethical or inappropriate behavior may be taking place or has already occurred you must report it to the Legal or Compliance Departments or the Integrity Hotline. These matters will be treated with sensitivity and will remain confidential to the greatest extent possible.

For all reports related to Adverse Events and Product Quality Complaints, contact <http://www.mallinckrodt.com/contact-us>.

To locate Mallinckrodt policies and procedures related to sales, marketing and medical activities, you may go the Compliance homepage on the @Work site.

To locate all other Mallinckrodt policies and procedures, you may go to the @Work site:

- **Global Library**
- **MasterControl**
- **Metric Stream**

If you need access to MC or MetricStream, please email:

Brands
CritCare-DocControl@mallinckrodt.com

Generics
document.control@mallinckrodt.com



Make a Commitment

As stated in our Guide, adherence to the law and the highest ethical standards of integrity is the foundation of everything we do. Meeting this standard and complying with all applicable laws and regulations does not just happen; it requires a commitment from each of us.

I acknowledge that I have read and understand the information set forth in **The Mallinckrodt Pharmaceuticals Guide to Business Conduct**. I will comply with these principles in all my daily work activities. I will also report any concerns and violations or suspected violations of law to this Guide through the [Integrity Hotline](#).

(Please print clearly)

Date: _____

Name: _____

City, State / Province: _____

Zip / Postal Code Country: _____

Signature: _____

Mallinckrodt Pharmaceuticals GBC V-1

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