

California Transparency in Supply Chains Act

People throughout the world count on Mallinckrodt products every day to help them lead healthier lives, and Mallinckrodt Pharmaceuticals believes that all human life should be held in the highest regard.

Mallinckrodt is a member of the Pharmaceutical Supply Chain Initiative (PSCI), a consortium of pharmaceutical and healthcare companies that share a vision of better social, environmental and economic outcomes within the supply chain (<https://pscinitiative.org/home>).

Mallinckrodt supports the human rights of workers and the treatment of all people with dignity and respect through two core policy documents: the *Mallinckrodt Pharmaceuticals Guide to Business Conduct* and the *Mallinckrodt Supplier Code of Conduct*.

Mallinckrodt requires all of its employees to be trained on the *Mallinckrodt Pharmaceuticals Guide to Business Conduct* and to certify annually both their understanding and compliance. The *Guide* reflects Mallinckrodt's aims for good global citizenship and worldwide social responsibility. It provides that Mallinckrodt's business units must provide clean and safe working environments and conditions, forbid child labor at their facilities, and require that employees receive all benefits mandated by applicable law. It further states Mallinckrodt's policy that business units must not engage in activities that fail to protect individual dignity and respect, even if permissible under local law.

The *Mallinckrodt Supplier Code of Conduct* outlines the expectations for the ethical behavior of Mallinckrodt suppliers, and prohibits child and compulsory labor, human trafficking and slavery, unsafe and hazardous working conditions and environments, and any behavior that does not maintain human dignity and respect.

Although Mallinckrodt does not have a formal process for verifying its supply chains or obtaining certification of compliance from suppliers, all suppliers are subject to audit. Mallinckrodt conducts audits of its suppliers based on an internal assessment of business and environmental health and safety risk. Mallinckrodt does not use a third party to verify supply chains or perform unannounced audits. Mallinckrodt encourages reporting of any unethical conduct up through supervisors and the leadership chain of command, or through the Mallinckrodt Pharmaceuticals Integrity Hotline.

The Integrity Hotline is a simple way for employees, suppliers and customers to express concerns regarding any potential unethical situation. The Integrity Hotline is available seven days a week, 24 hours a day. Additional information may be found at <http://www.mallinckrodt.com/contact-us>, Compliance & Business Integrity. The number is 888-696-9864.

Mallinckrodt may take disciplinary action against anyone found to have violated the *Mallinckrodt Pharmaceuticals Guide to Business Conduct* or the *Mallinckrodt Supplier Code of Conduct*, which can include termination of employment or supply agreements.