

Mallinckrodt Pharmaceuticals Supplier Code of Conduct

Mallinckrodt Pharmaceuticals (Mallinckrodt) maintains high ethical standards for conducting business and does so in accordance with all governmental and industry standards, laws, rules and regulations, as well as Mallinckrodt's internal policies. Mallinckrodt expects the same commitment from suppliers.

The Supplier Code of Conduct applies to all suppliers of goods and services to any Mallinckrodt business, regardless of location. The Supplier Code of Conduct specifies the primary principles and expectations Mallinckrodt requires of suppliers that wish to maintain or establish a business relationship with Mallinckrodt. Mallinckrodt reserves the right to immediately discontinue business relationships with suppliers who violate any policy or standards contained in this Code of Conduct. Mallinckrodt will not do business with a supplier if any of its officers, directors, or employees are, or become, excluded from, debarred by, or ineligible to participate in any governmental contracting program.

In general, all Mallinckrodt suppliers shall:

- Understand and comply with this Supplier Code of Conduct and policies or positions linked herein.
- Maintain documentation necessary to demonstrate such conformance.
- Immediately report to Mallinckrodt any gaps in compliance with this Supplier Code of Conduct, any event that affects such compliance or any other events potentially affecting Mallinckrodt, its products and/or suppliers' compliance with any applicable Supply Agreements or Quality Agreements with Mallinckrodt.
- Immediately communicate to Mallinckrodt any significant inspection or regulatory issue with national or international health authorities.
- Allow Mallinckrodt or our authorized delegate to conduct necessary audits of facilities, systems and/or documents related to the content of this Supplier Code of Conduct and the policies or positions linked herein.
- Comply with applicable laws, regulations, rules, ordinances, permits, licenses, approvals, orders, standards, prohibitions, sanctions and Mallinckrodt requirements in all aspects covered within this Supplier Code of Conduct.
- Contact a Mallinckrodt representative with any questions regarding the principles and expectations set forth in this Supplier Code of Conduct.

ENVIRONMENTAL

Mallinckrodt believes it has a responsibility to manage and lessen our impact on the environment, including through our supply network.

- Suppliers shall operate in an environmentally responsible manner to minimize adverse environmental impacts and support biodiversity.
- Suppliers are required to obtain/maintain and comply with all required environmental authorizations, permits, and licenses.

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- Suppliers are encouraged to conserve natural resources, limit using hazardous materials, and reduce, reuse and recycle wastes generated by operations.
- Make reasonable efforts toward transparency and public disclosure of ESG and environment-related data and goals, including responding to requests for participation in disclosure programs (e.g., CDP questionnaires on climate/water security).
- Conduct due diligence on source of key raw materials to promote legal and sustainable sourcing; label and/or communicate any restricted substances regulated under various regulatory schemes (e.g. EU REACH) for recycling and disposal; respond to requests for substance composition in materials/parts; verify plants/forests materials are legally harvested and imported/exported.

SOCIAL

Health and Safety

Suppliers shall conduct activities with adequate regard for the safety and health of their employees and the general public. Suppliers shall:

- Ensure appropriate housekeeping and providing workers access to potable water.
- Provide a safe and healthy working environment, including, where applicable, for any company-provided living quarters.
- Protect workers from exposure to hazards and ensure that proper personal protective equipment and work is according to all applicable laws, regulations and other requirements.
- Have process safety programs, identifying, monitoring and preventing/controlling exposure to hazards, and ensuring response to hazardous chemical or biological releases, if applicable.
- Have sufficient business interruption plans to ensure continuity of supply.
- Make hazard information available, including for pharmaceutical compounds and materials, ensuring compliance and proper monitoring through documents such as Safety Data Sheets (SDS).

Responsible Supply Chain

- Comply with the Principles of the Pharmaceutical Supply Chain Initiative (PSCI), of which Mallinckrodt is a member (<https://pscinitiative.org>).
- Ethical Sourcing - Conflict Minerals: Supplier shall ensure that they are compliant with all applicable regulations regarding "Conflict Minerals," provide applicable "Conflict Mineral" data upon request and demonstrate a commitment to remediation of identified sourcing of minerals from conflict areas. Additionally, if supplying to Mallinckrodt in the European Union, supplier shall have systems in place that meet the standards outlined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

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- Comply with all applicable laws and regulations related to responsible supply chain.

Respect for Human Rights

Mallinckrodt conducts business responsibly, and in accordance with the highest standards, including respect for human rights, both in our own operations and throughout our supply network. Suppliers shall:

- Uphold ethical labor practices and procedures. They shall not employ, use, or otherwise benefit from forced, bonded or indentured labor, involuntary prison labor or human trafficking.
- Comply with the UK Modern Slavery Act 2015 and other similar laws, regulations, and requirements restricting forced and child labor, including those enforced by U.S. Customs and Border Protection.
- Certify the products or services provided to Mallinckrodt, including the materials incorporated into their products, comply with laws regarding forced labor of the country or countries in which Mallinckrodt and the supplier have operations.
- Support and protect internationally recognized human rights and abide by Mallinckrodt's Position on Human Rights including support for the spirit and provisions of the Universal Declaration of Human Rights and subsequent guidance set forth in the United National Guiding Principles on Business and Human Rights.
- Provide a workplace free of harassment, violence, discrimination, punitive and/or inhumane treatment.
- Ensure freely chosen employment and freedom of movement by not using misleading recruiting practices; allowing employees, contractors and subcontractors access to their identity documents; and allowing workers to leave employment following reasonable notice.
- Respect the rights of workers to lawfully form or join trade unions of their choosing and to bargain collectively.
- Abide by the International Labor Organization's Minimum Age Convention and the International Labor Organization's Worst Forms of Child Labour Convention.
- Wages, Benefits and Working Hours: Communicate the basis of compensation to workers and ensure any supplier-provided housing for workers meets local standards.
- Implement hiring practices that prohibit discrimination. These principles extend to all employment decisions, including recruiting, hiring, training, promotions, compensation, benefits, transfers and workforce reductions.
- Support a commitment to the utilization of small businesses within the supply chain and to deploy strategies and programs to increase sourcing opportunities for small businesses, where appropriate.

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GOVERNANCE

Business Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity and in full alignment with the Supplier Code of Conduct. Suppliers shall have adequate Anti-Corruption/Anti-Bribery policies and systems in place and shall not engage in corruption, extortion or embezzlement practices. Further, suppliers shall not pay or accept bribes or participate in any other illegal inducements in business or government relationships, including through third parties or intermediaries and shall employ fair business practices including accurate and truthful advertising.

Suppliers will meet the following standards:

- Avoid conflicts of interest: Including situations that present – or create the appearance of – a conflict between their interests and their obligations to Mallinckrodt. Suppliers shall notify Mallinckrodt immediately, in writing, in the event of a potential or actual conflict of interest.
- Comply with prohibitions on insider trading and on use of non-public information.
- Comply with antitrust and unfair competition laws and regulations.
- Trade controls or export controls regulations: Suppliers shall not provide to Mallinckrodt any materials, products, services, software or technical data that originated or were otherwise sourced, directly or indirectly from:
 - A comprehensively sanctioned country or territory (at present, the Crimea region and Sevastopol, Cuba, Iran, North Korea, Lebanon, and Syria); or
 - From a party (entity or individual) or destination subject to sanctions regimes, or export controls, including but not limited to, those administered by the United Nations, the United States of America, Israel, the United Kingdom, Canada and the European Union whereby the receipt or transfer by Mallinckrodt would result in a violation of such sanctions regimes or export controls.
- Maintain effective business controls and accurate reporting and maintain accurate and complete records in compliance with international accounting principles.
- Maintain data integrity for materials and services: Documentation delivered to Mallinckrodt should be complete, consistent and accurate.
- Maintain effective business controls and accurate reporting and maintain accurate and complete records in compliance with international accounting principles.
- Fully comply with all applicable anti-corruption laws including, without limitation, the U.S. Foreign Corrupt Practices Act (FCPA).
- Comply with Mallinckrodt's Global Anti-Bribery and Anti-Corruption Policy. Suppliers who are Third Party Representatives (TPRs) will:
 - Be subject to Mallinckrodt Global Compliance Due Diligence process

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- For any concerns related to interactions with Mallinckrodt, contact a Mallinckrodt representative or the Integrity Hotline to report a concern or to get information or advice anonymously. The goal of this hotline is to address concerns quickly, fairly, and at the proper level in the organization. To contact the Integrity Hotline, please call (888) 696-9864 or click [here](http://www.mallinckrodt.ethicspoint.com) (<http://www.mallinckrodt.ethicspoint.com>).

Management Systems

Suppliers shall have management systems and processes in place to facilitate continuous improvement, business continuity and compliance with all the principles outlined in this document. The following management systems are the minimum expectation for a Mallinckrodt supplier:

- Establish risk management systems to determine and control risks in all areas addressed in this document, including business continuity and risk management plans to facilitate continuity of operations.
- Create training programs that allow management and workers to document and improve understanding and adherence to the global principles, guidelines and regulations established in this document.
- Maintain open and direct communication with appropriate Mallinckrodt business functions and establish effective systems to communicate the principles outlined in this document to workers, contractors, and their own suppliers.

Confidentiality and Publicity

All Mallinckrodt suppliers are expected to respect Mallinckrodt's proprietary and confidential information and must maintain policies that enforce strict compliance with the confidentiality of such information.

- Ensure privacy & protection of personal information and abide by Mallinckrodt's Global Data Protection and Privacy Policy. A Data Privacy Event or Data Security Incident should be reported immediately to Data Privacy team at privacy@mnk.com and the Cybersecurity team at CSIRT@mnk.com.
- Mallinckrodt prohibits the public disclosure of its name, logo, likeness, supplier relationships, products, parts, designs or any other non-public information in any press release, prospectus, offering memorandum, customer list, web site, including, without limitation, product displays at any trade show or supplier facility, without specific prior written authorization.