

## UK Modern Slavery Act Disclosure

The Modern Slavery Act 2015 (“the Act”) came into effect on 29 October 2015 and requires those entities carrying on a business or part of a business in the UK, supplying goods or services, and having annual turnover of £36 million or more to disclose information regarding the steps they have taken to eradicate slavery and human trafficking from their supply chain as well as within their own organization during the previous financial year. This statement has been prepared by Mallinckrodt plc and its consolidated subsidiaries (“Mallinckrodt” or “we”) in order to comply with Section 54 of the Act and covers the fiscal year ended December 27, 2019. Mallinckrodt plc is incorporated in Ireland and its principal executive offices are located at 3 Lotus Park, The Causeway, Staines-Upon-Thames, Surrey, United Kingdom. The subsidiary entities that are covered by this report include the following: Mallinckrodt ARD Holdings Limited; Mallinckrodt Chemical Holdings (U.K.) Ltd.; Mallinckrodt Chemical Limited; Mallinckrodt Enterprises UK Limited; Mallinckrodt Equinox Limited; Mallinckrodt Medical Holdings (UK) Limited; Mallinckrodt Pharmaceuticals Limited; Mallinckrodt UK Ltd.; Mallinckrodt UK Finance LLP; MKG Medical UK Ltd; MUSHI UK Holdings Limited; and Therakos (UK), Ltd.

We are a global business consisting of multiple wholly owned subsidiaries that develop, manufacture, market and distribute specialty pharmaceutical products and therapies. Areas of focus include autoimmune and rare diseases in specialty areas like neurology, rheumatology, nephrology, pulmonology and ophthalmology; immunotherapy and neonatal respiratory critical care therapies; analgesics and gastrointestinal products.

People throughout the world count on Mallinckrodt products every day to help them lead healthier lives, and we believe that all human life should be held in the highest regard. While we believe the risk of modern slavery and human trafficking is relatively low in the highly regulated pharmaceutical industry, as a global company we recognize that our responsibility to ensure that modern slavery and human trafficking are not taking place extends to our business relationships as well. To support these efforts, we have joined 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>).

We have taken several steps to mitigate the risks associated with modern slavery in our business and supply chain. In particular, we support the human rights of our workers and the treatment of all people with dignity and respect through two core policy documents: the Mallinckrodt Supplier Code of Conduct and the Mallinckrodt Pharmaceuticals Guide to Business Conduct.

The Mallinckrodt Supplier Code of Conduct outlines the expectations for the ethical behavior of our 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. These standards apply to all suppliers of goods and services to any Mallinckrodt business or supplier, regardless of location.

All of our employees are required to be trained on the Mallinckrodt Pharmaceuticals Guide to Business Conduct and to certify annually both to their understanding and compliance. The Guide reflects our aims for good global

citizenship and worldwide social responsibility. It provides that we must provide clean and safe working environments and conditions free of human rights violations, and forbids forced or child labor at Mallinckrodt and at the companies with which we work, with no exceptions. The Guide also prohibits human trafficking or slavery, unsafe or hazardous conditions or environments, or any behavior that does not maintain human dignity and respect. It further states that Mallinckrodt must not engage in activities that fail to protect individual dignity and respect, even if permissible under local law, and must pay a fair wage.

We 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.

Mallinckrodt incorporates language related to compliance with the Act into certain of its contracts with suppliers and other service providers, and will continue to assess appropriate incorporation of such language as business needs evolve. In addition, as a contractor to the U.S. government, we have specific obligations with regard to human trafficking pursuant to Federal Acquisition Regulation clause 52.222-50, Combating Trafficking in Persons, and Defense Federal Acquisition Regulation Supplement 252.222-7007, Representation Regarding Combating Trafficking in Persons. In 2017, we instituted a Human Trafficking Policy that applies to all Mallinckrodt employees, subcontractors, suppliers and other partners that assist in our performance of all U.S. government contracts and subcontracts, and expressly prohibits Mallinckrodt from engaging in human trafficking while performing under such contracts.

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.

Although we do not have a formal process for verifying our 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, and measures against recognized industry standards. We do not use a third party to verify supply chains or perform unannounced audits.

This statement has been approved by our Board of Directors on 26 February 2020.

Signed,

A handwritten signature in black ink, appearing to read "Mark C. Trudeau". The signature is fluid and cursive, written in a professional style.

Mark C. Trudeau  
President, Chief Executive Officer and Director