

Mallinckrodt Pharmaceuticals

Tax Strategy

Introduction

Mallinckrodt Pharmaceuticals (“Mallinckrodt”) is a global specialty pharmaceutical company dedicated to its mission of managing complexity and improving lives. We provide medicines to address unmet patient needs, investing in areas such as autoimmune and rare diseases; immunotherapy and neonatal respiratory critical care therapies; analgesics and hemostasis products. We also offer a comprehensive portfolio of specialty generics controlled substances for pain management as well as a broad line of active pharmaceutical ingredients.

Governance, risk management and compliance

Mallinckrodt maintains policies and procedures to ensure compliance with all applicable tax laws and regulations and supports the principles of transparency and active engagement with all stakeholders. We have established processes to ensure the integrity of our tax returns, and timely and accurate tax payments in all countries in which we operate.

Tax matters are brought to the attention of our Board of Directors and Audit Committee. In addition, tax positions are regularly reviewed by our external auditors and by tax authorities as part of the normal course of tax-compliance procedures.

Tax Planning

Mallinckrodt conducts business based on sound commercial principles, while taking into account all relevant costs, including tax. We do not enter into artificial arrangements in order to avoid taxation. We apply standards established by the Organization for Economic Cooperation and Development (OECD) and other national legislation to all of our intercompany transactions.

Approach in dealings with Tax Authorities

Mallinckrodt is committed to complying with global tax laws and regulations. We have an open and effective working relationship with HM Revenue & Customs and seek to foster constructive relationships with tax authorities in all territories in which we operate. We engage with governments on tax policy where we believe we can provide valuable commercial insight.

Level of Acceptable Tax Risk

Mallinckrodt’s approach to tax risk is integrated with our broader business risk management and compliance framework. Our decisions and actions regarding tax are based on a considered assessment of long term costs and risks, including their impact on our relationship with stakeholders and our reputation with customers. Mallinckrodt uses external advisers to provide technical tax expertise and resources based on an assessment of risk and requirements.

This strategy is published pursuant to Schedule 19 of the Finance Act 2016 and relates to the financial year ended 31 December 2018. It will be updated annually in accordance with UK legislation.