

Policy on U.S. Political Contributions and Lobbying Activities

This policy outlines Mallinckrodt's commitment to transparent, ethical, and compliant engagements regarding political contributions, lobbying activities, and memberships in trade, policy, and political organizations.

State and Federal Elected officials throughout the country make decisions on public policy issues impacting our industry, our company, and the patients we serve. As such, Mallinckrodt actively participates in the U.S. political process to help shape public policy at the federal and state levels. We advocate for policies and positions that:

- Protect and expand patient access to innovative therapies;
- Support a competitive marketplace and a regulatory environment in which innovation to benefit patients can thrive; and
- Advance principles of good corporate citizenship, such as equality, diversity and inclusion, and community health and development.

Mallinckrodt is committed to ethical and transparent engagements with all external stakeholders. We disclose our political contributions, costs associated with lobbying in the United States, as well as the trade, policy, and political organizations of which we are members in our annual Corporate Social Responsibility (CSR) report on our website.

Oversight

The Governance and Compliance Committee of the Mallinckrodt Board of Directors monitors the Company's political activities and receives annual updates on the way political funds are spent on behalf of Mallinckrodt. Political activities are also guided by outside legal experts in political and lobbying law to help us ensure compliance with federal, state, and local campaign finance and lobbying rules, reporting, and other applicable requirements.

Political Action Committee

An important part of Mallinckrodt's civic engagement is participation in the U.S. political process. Mallinckrodt established the Mallinckrodt LLC PAC ("MNKPAC"), a federally registered political action committee, to provide eligible employees the opportunity to voluntarily contribute funds to support political candidates who share our commitment to innovation and patient access, as well as other values such as diversity, equity, and inclusion.

In accordance with U.S. federal law, participation in MNKPAC is restricted to managerial or professional level employees who are U.S. citizens or permanent residents. Because contributions are voluntary, an employee's decision to participate or not participate in MNKPAC in no way affects their standing in or employment with the Company. MNKPAC membership can be canceled at any time, without penalty. All MNKPAC's eligible administrative expenses are paid by Mallinckrodt as permitted by law.

MNKPAC is overseen by the PAC Executive Committee (Chair, Treasurer and Assistant Treasurer/ Manager) and is advised by a board of directors comprised of employees from across the Company, as well as external political advisors. Board members are appointed by

the PAC Executive Committee and serve a two-year term. All officers and board members are U.S. citizens or permanent residents, in accordance with federal law.

All MNKPAC contributions are made with Mallinckrodt's best interests in mind and without regard to the personal political preferences of company management. Before making any contribution, several factors are carefully and strategically considered.

Guidelines for Consideration of Candidate Support:

- The candidate's positions on issues that impact patients, employees, and our business, including diversity and inclusion
- The presence of Mallinckrodt facilities and employees in the candidate's district or state
- The candidate's position and overall support of the biopharmaceutical industry and medical innovation
- The candidate's membership on key committees of jurisdiction
- The candidate's character, integrity, and likelihood of election success

MNKPAC is a separate fund that is registered with the Federal Election Commission (FEC) as a multi-candidate political action committee affiliated with Mallinckrodt LLC (identification number: C00569152). MNKPAC filings are publicly available and can be viewed on the FEC website [here](#).

Corporate Contributions

Where permitted by law, Mallinckrodt may contribute corporate funds to state and local candidates. These contributions undergo a stringent evaluation process, adhere to Mallinckrodt's published guidelines for candidate support and are made without regard to the personal political preferences of Company management. All contributions are made in compliance with relevant and applicable federal, state, and local election reporting laws.

Lobbying Disclosure

Under the Lobbying Disclosure Act, as amended (2 U.S.C. § 1601 *et. seq.*), Mallinckrodt is required to register and report federal lobbying activities on a quarterly basis to the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate. These reported expenditures include the value of labor hours spent on lobbying activities by all relevant Company representatives, as well as the portion of national trade association dues used for lobbying. Federal lobbying expenditure reports can be viewed at lobbyingdisclosure.house.gov.

Registered state lobbyists working on behalf of Mallinckrodt are required to fulfill all reporting requirements as defined by each state. In many states and a number of localities, certain sales activities with government entities are regulated as lobbying and require registration and periodic reporting. Where so required, the Company discloses its governmental procurement activities in accordance with applicable law.

Trade Associations, Policy and Political Organizations

Mallinckrodt is a member of policy organizations and trade associations that represent the biopharmaceutical sector and the broader business community. These organizations serve as advocates for our industry on policy issues, provide opportunities to appropriately collaborate on educational initiatives and enhance our understanding of the evolving regulatory environments.

Mallinckrodt representatives serve on various boards and committees within these organizations to ensure our voice is heard on important policy issues concerning our business, employees, and patients.

Mallinckrodt publishes a listing of the trade, policy, and political organizations to which we pay annual membership dues and the percentage of such payment that is attributed to lobbying and political activity in our annual CSR report on our website.

International Activities

We periodically engage with advisors to help us navigate regional or national policy and regulatory environments in the regions where we conduct business. Mallinckrodt complies with all applicable rules and laws in the countries where we undertake political or policy activities. We currently do not make any political contributions in any country other than the United States.