



Mallinckrodt
Pharmaceuticals

**POLITICAL
TRANSPARENCY REPORT
2018**

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letter from
Mark Trudeau
PRESIDENT & CEO

Mallinckrodt is an innovation-driven global biopharmaceutical company united around a powerful mission – **Managing Complexity. Improving Lives.** Last year we invested \$361.1 million, or 11.2% of net sales, in research and development – \$84 million more than the year before – to fuel innovation and help deliver new treatment options for underserved patients with severe and critical conditions. Our business relies on the commitment of our 3,400 dedicated employees around the world, as well as on the insight and leadership of the many policymakers and influencers who are helping to shape the legislative and regulatory landscape in which we work.

This landscape will either propel innovation in drug and biologic therapies or hinder it, and Mallinckrodt engages at all levels of government to 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 inclusion and diversity, and community health and development.



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The decisions elected officials make can have a significant impact on how health care is delivered, resourced and regulated, and Mallinckrodt seeks to contribute ideas and viewpoints on issues that matter most to our employees, our shareholders and the patients and families we serve.

At the same time, Mallinckrodt strives to be a trusted partner to all stakeholders and is committed to transparency and responsible business practices. This report covers the 2018 calendar year political contributions made by MNKPAC, the Mallinckrodt LLC Political Action Committee. It also describes corporate contributions made by Mallinckrodt directly, where permitted by law, and provides information on our company's U.S. federal and state lobbying activities, political and policy memberships and political engagements outside of the United States. We aim to provide helpful information and intend to update our report on an annual basis with the expectation that it will expand in scope over time.

At Mallinckrodt, four core values – Patient Centric, Innovative, Collaborative, and Integrity – guide the day-to-day work we do and all of our interactions with stakeholders. We hope that providing more insight into how we operate will further strengthen the trust and confidence that people have placed in our company and enable us to continue innovating and serving patients for years to come.

Mark Trudeau
President and Chief Executive Officer

U.S. FEDERAL AND STATE POLITICAL ACTIVITIES

Every day, the people of Mallinckrodt work together to develop innovative therapies and cutting-edge technologies for underserved patients with severe and critical conditions. This work is made possible, in part, by our involvement in the U.S. political process – engaging with candidates and elected officials to help them understand how policies under consideration may impact our business and ability to serve patients. Mallinckrodt uses a variety of tools to support candidates who champion innovation and patient-focused ideas, and help shape public policy at the federal and state levels. Those tools include MNKPAC, corporate contributions, where permitted by law, and other related activities, such as direct and contracted lobbying.

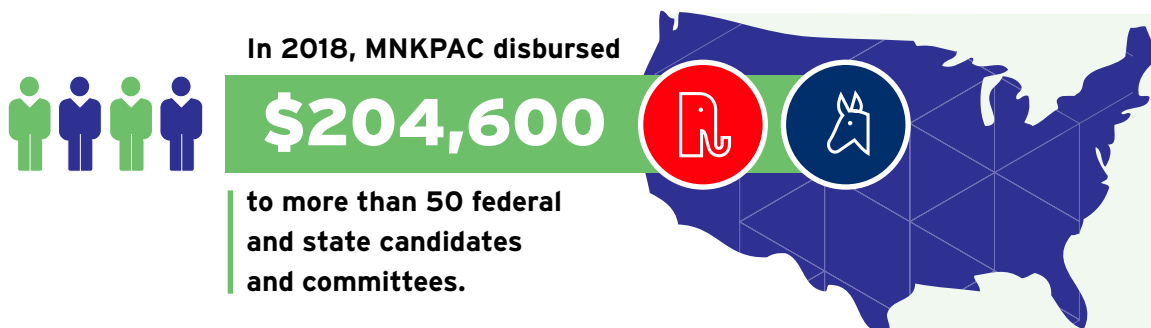
Mallinckrodt believes that ethical, transparent relationships benefit all stakeholders, and we are committed to operating with honesty, integrity and in compliance with applicable laws and regulations everywhere we conduct business.

Mallinckrodt believes that ethical, transparent relationships benefit all stakeholders, and we are committed to operating with honesty, integrity and in compliance with applicable laws and regulations everywhere we conduct business. Mallinckrodt's Board of Directors monitors the company's political and policy activities through its Nominating and Governance Committee, which receives regular reports from the Senior Vice President of Government Affairs. Additionally, these activities are 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.



MNKPAC - Mallinckrodt LLC Political Action Committee

An important part of Mallinckrodt's government affairs activities is participation in the U.S. political process. MNKPAC gives eligible employees the opportunity to contribute funds for use in supporting political candidates who share our commitment to medical innovation and patient access, as well as other corporate goals, such as inclusion and diversity. MNKPAC does not affiliate with a particular party and supports candidates who identify as Democrats, Independents and Republicans. In 2018, MNKPAC received \$158,944.73 in voluntary employee contributions and disbursed \$204,600¹ to more than 50 federal and state candidates and committees.² All contributions are received and disbursed pursuant to our internal contribution guidelines and in accordance with applicable federal, state and local campaign finance and lobbying rules. All MNKPAC disbursements are administered by an external law firm with expertise in these issues.



¹ The total amount shown here and in the detailed contribution breakouts on pages 10 - 12 may not include subsequently voided or refunded contributions and bank fees and, therefore, may vary from Federal Election Commission (FEC) reporting in 2018.

² It is not uncommon for MNKPAC to spend more in election years than it receives, by using funds carried over from prior years, and less than it receives in non-election years.

In accordance with U.S. federal law, participation in MNKPAC is restricted to certain 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 the company. Individual employee contribution information is not shared outside of the Government Affairs department, except with certain payroll employees, and MNKPAC membership can be canceled by an employee at any time, without penalty. All of MNKPAC’s eligible administrative expenses are paid by Mallinckrodt as permitted by law.

Guidelines for Candidate Support

MNKPAC is nonpartisan. All contributions are made in alignment with Mallinckrodt’s goals of supporting innovation and patient access, as well as certain corporate priorities like inclusion and diversity, and are made without consideration to the personal political preferences of company management.

Before making any contribution, a number of factors are carefully and strategically considered, as described in the table below.



The candidate’s positions on business and policy issues that impact the patients we serve, our employees and our business



The presence of Mallinckrodt facilities and employees in the candidate’s district or state



The candidate’s position and overall support for the biopharmaceutical industry and medical innovation



The candidate’s leadership – or potential leadership – role and membership on key committees with jurisdiction over matters important to our stakeholders and business



The candidate’s character, integrity and likelihood of election success



Recommendations by MNKPAC members that meet other factors

Management and Oversight

MNKPAC is managed 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. The PAC Executive Committee manages the daily activities of MNKPAC, including the solicitation of contributions and disbursement of funds. All officers and board members are U.S. citizens or permanent residents, in accordance with federal law.

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. MNKPAC filings are publicly available and can be viewed [on the FEC website](#).

PAC EXECUTIVE COMMITTEE

MNKPAC Chair

Hugh O'Neill
Executive Vice President
and Chief Commercial Officer

MNKPAC Treasurer

Mark Tyndall
Senior Vice President
Government Affairs

MNKPAC Assistant Treasurer/Manager

Gena Holthaus
Senior Manager
Government Affairs and
Community Engagement

BOARD OF DIRECTORS

AnnMarie Barber, MS, MSN, CRNP

Clinical Nurse Educator

Cathryn Beisel

Senior Director
Benefits - Total Rewards

Melissa Falcone

Vice President
Patient Services
and Reimbursement

Derek Naten

Executive Director
Government Affairs
and Patient Advocacy

Shri Ramachandran

Vice President and
Chief Information Officer

Jon Stipanovich

Senior National Account Manager

Ryan Tichenor

Senior Manager
Tax Planning

2018 MNKPAC Receipts

\$158,944.73

**TOTAL
RECEIPTS**

270

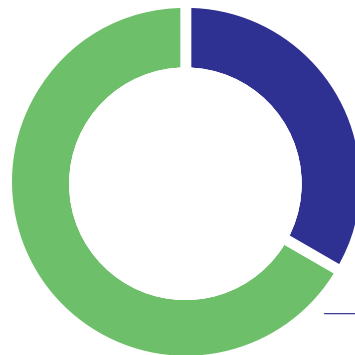
DONORS

\$588.68

**AVERAGE
CONTRIBUTION**

2018 MNKPAC Disbursements

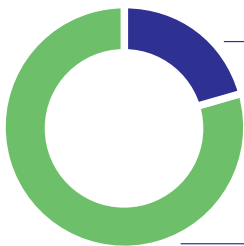
**TOTAL
\$204,600**



**DEMOCRAT
\$69,000
(33.7%)**

**REPUBLICAN
\$135,600
(66.3%)**

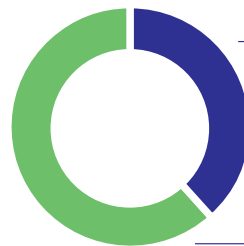
U.S. SENATE



**DEMOCRAT
\$11,000
(20.8%)**

**REPUBLICAN
\$42,000
(79.2%)**

U.S. HOUSE



**DEMOCRAT
\$58,000
(38.9%)**

**REPUBLICAN
\$91,000
(61.1%)**

DISBURSEMENTS BY OFFICE




U.S. SENATE

Last Name	First Name	Political Committee	Cycle	Amount	Party	Office	State
Alexander	Lamar	Tenn PAC	2018	\$1,500	R	Senate	TN
Barrasso	John	Friends of John Barrasso	2018	\$1,000	R	Senate	WY
Blunt	Roy	Friends of Roy Blunt	2022	\$5,000	R	Senate	MO
Blunt	Roy	Rely on Your Beliefs Fund	2018	\$5,000	R	Senate	MO
Coons	Chris	Blue Hen PAC	2018	\$5,000	D	Senate	DE
Enzi	Mike	Making Business Excel Political Action Committee	2018	\$1,000	R	Senate	WY
Gardner	Cory	Project West PAC	2018	\$5,000	R	Senate	CO
Grassley	Chuck	Hawkeye PAC	2018	\$5,000	R	Senate	IA
Kennedy	John	Pelican PAC	2018	\$3,500	R	Senate	LA
Murray	Patty	People for Patty Murray	2022	\$5,000	D	Senate	WA
Sinema	Kyrsten	Getting Stuff Done PAC	2018	\$1,000	D	Senate	AZ


U.S. HOUSE

Last Name	First Name	Political Committee	Cycle	Amount	Party	Office	State	District
Aguilar	Pete	Pete Aguilar for Congress	2018	\$1,000	D	House	CA	31
Boyle	Brendan	Citizens for Boyle	2018	\$1,000	D	House	PA	2
Brady	Kevin	Brady for Congress	2018	\$5,000	R	House	TX	8
Bucshon	Larry	Bucshon for Congress	2018	\$1,000	R	House	IN	8
Burgess	Michael	Lone Star Leadership PAC	2018	\$1,000	R	House	TX	26
Clay Jr.	William	Clay Jr. for Congress	2018	\$4,000	D	House	MO	1
Davis	Rodney	Rodney for Congress	2018	\$5,000	R	House	IL	13
Eshoo	Anna	Anna Eshoo for Congress	2018	\$1,500	D	House	CA	18
Gottheimer	Josh	Josh Gottheimer for Congress	2018	\$1,000	D	House	NJ	5
Graves	Garret	Garret Graves for Congress	2018	\$5,500	R	House	LA	6
Guthrie	Brett	Guthrie for Congress	2018	\$1,500	R	House	KY	2
Hartzler	Vicky	Vicky Hartzler for Congress	2018	\$1,000	R	House	MO	4

* MNKPAC disbursements that were refunded or voided are not included in the breakouts above.

Last Name	First Name	Political Committee	Cycle	Amount	Party	Office	State	District
Holding	George	George Holding for Congress Inc.	2018	\$7,500	R	House	NC	2
Hoyer	Steny	Hoyer's Majority Fund	2018	\$5,000	D	House	MD	5
Hudson, Jr.	Richard	Hudson for Congress	2018	\$1,000	R	House	NC	8
Kind	Ronald	Kind for Congress Committee	2018	\$5,000	D	House	WI	3
Lance	Leonard	Lance for Congress	2018	\$6,000	R	House	NJ	7
Latta	Robert	Latta for Congress	2018	\$3,000	R	House	OH	5
Long	Billy	Billy Long for Congress	2018	\$3,000	R	House	MO	7
Matsui	Doris	Matsui for Congress	2018	\$5,000	D	House	CA	6
McMorris Rodgers	Cathy	American Dream Project	2018	\$1,000	R	House	WA	5
Neal	Richard	Richard E Neal for Congress	2018	\$9,000	D	House	MA	1
Pallone, Jr.	Frank	Pallone for Congress	2018	\$6,000	D	House	NJ	6
Paulsen	Erik	ICE PAC	2018	\$5,000	R	House	MN	3
Pocan	Mark	Mark Pocan for Congress	2018	\$8,000	D	House	WI	2
Richmond	Cedric	Richmond for Congress	2020	\$5,000	D	House	LA	2
Roskam	Peter	Roskam for Congress Committee	2018	\$1,000	R	House	IL	6
Scalise	Steve	Scalise for Congress	2018	\$10,000	R	House	LA	1
Shimkus	John	John S Fund	2018	\$3,000	R	House	IL	15
Shimkus	John	Volunteers for Shimkus	2018	\$5,000	R	House	IL	15
Smith	Jason	Jason Smith for Congress	2018	\$3,500	R	House	MO	8
Stefanik	Elise	Elise for Congress	2018	\$1,000	R	House	NY	21
Wagner	Ann	Ann PAC	2018	\$2,000	R	House	MO	2
Walden	Gregory	Walden for Congress	2018	\$2,500	R	House	OR	2
Walden	Gregory	Walden Victory Fund	2018	\$5,000	R	House	OR	2
Walorski	Jackie	Walorski for Congress Inc	2018	\$4,000	R	House	IN	2
Walters	Mimi	Walters for Congress	2018	\$7,500	R	House	CA	45
Watson Coleman	Bonnie	Bonnie Watson Coleman for Congress	2018	\$1,500	D	House	NJ	12

* MNKPAC disbursements that were refunded or voided are not included in the breakouts above.

NATIONAL PARTY AND OTHER COMMITTEES

Committee	Cycle	Amount	Party	Office	State
New Democrat Coalition PAC, The	2018	\$5,000	D	House	DC
National Republican Senatorial Committee (NRSC)	2018	\$15,000	R	Senate	DC

GOVERNOR

Last Name	First Name	Political Committee	Cycle	Amount	Party	Office	State
Parson	Mike	Uniting Missouri PAC	2018	\$2,600	R	Governor	MO

* MNKPAC disbursements above \$5,000 to federal campaign committees during this cycle reflect contributions made to both the primary and general elections of individual candidates.

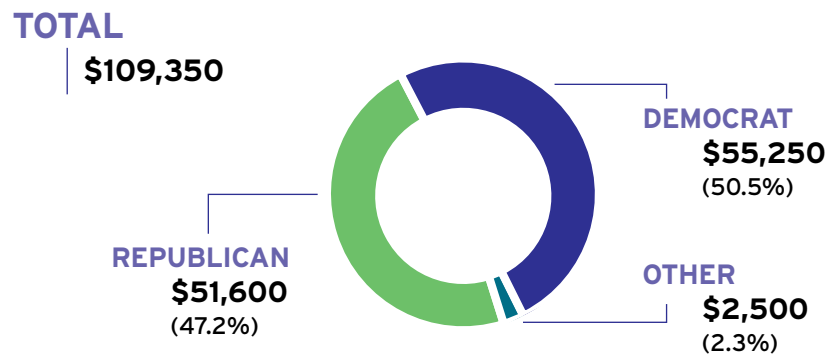
* MNKPAC disbursements that were refunded or voided are not included in the breakouts above.



Corporate Contributions

Where permitted by law, Mallinckrodt may contribute corporate funds to state and local candidates. The Government Affairs department utilizes the same internal guidelines that are applied to MNKPAC when determining whether a candidate or committee should receive funds. All contributions are made in compliance with relevant state and local election reporting laws.

In 2018, Mallinckrodt made corporate contributions in nine states, totaling \$109,350.



CANDIDATES

Last Name	First Name	Political Committee	Cycle	Amount	Party	Office	State	District
Arambula	Joaquin	Joaquin Arambula for Assembly 2018	2018	\$1,500	D	House	CA	31
Baker	Catharine	Catharine Baker for Assembly 2018	2018	\$2,000	R	House	CA	16
Burke	Autumn	Autumn Burke for Assembly 2018	2018	\$1,500	D	House	CA	62
Cooper	Jim	Jim Cooper for Assembly 2018	2018	\$3,000	D	House	CA	9
Cunningham	Jordan	Jordan Cunningham for Assembly 2018	2018	\$1,500	R	House	CA	35
Daly	Tom	Tom Daly for Assembly 2018	2018	\$2,000	D	House	CA	69
Flora	Heath	Heath Flora for Assembly 2018	2018	\$3,500	R	House	CA	12
Fong	Vince	Vince Fong for Assembly 2018	2018	\$1,500	R	House	CA	34


CANDIDATES

Last Name	First Name	Political Committee	Cycle	Amount	Party	Office	State	District
Gipson	Mike	Gipson for Assembly 2018	2018	\$1,500	D	House	CA	64
Gonzalez	Lorena	Lorena Gonzalez for Assembly 2018	2018	\$4,500	D	House	CA	80
Gray	Adam	Adam Gray for Assembly 2018	2018	\$1,500	D	House	CA	21
Grayson	Tim	Tim Grayson for Assembly 2018	2018	\$1,500	D	House	CA	14
Irwin	Jacqui	Jacqui Irwin for Assembly 2018	2018	\$2,000	D	House	CA	44
Jones-Sawyer Sr.	Reggie	Jones-Sawyer for Assembly 2020	2018	\$1,500	D	House	CA	59
Maienschein	Brian	Maienschein for Assembly 2018	2018	\$2,000	D	House	CA	77
Mayes	Chad	Chad Mayes for Assembly 2020	2018	\$4,100	R	House	CA	42
Medina	Jose	Jose Medina for Assembly 2018	2018	\$1,500	D	House	CA	61
Mullin	Kevin	Kevin Mullin for Assembly 2018	2018	\$1,500	D	House	CA	22
Nazarian	Adrin	Adrin Nazarian for Assembly 2018	2018	\$2,500	D	House	CA	46
Quirk	Bill	Bill Quirk for Assembly 2018	2018	\$1,000	D	House	CA	20
Rodriguez	Freddie	Rodriguez for Assembly 2018	2018	\$2,000	D	House	CA	52
Rubio	Blanca	Blanca Rubio for Assembly 2018	2018	\$2,500	D	House	CA	48
Atkins	Toni	Re-Elect Senator Atkins 2020	2020	\$2,000	D	Senate	CA	39
Borgeas	Andreas	Borgeas for Senate 2018	2018	\$2,000	R	Senate	CA	8
Glazer	Steve	Glazer for Senate 2020	2020	\$2,000	D	Senate	CA	7
Pan	Richard	Dr. Richard Pan for Senate 2018	2018	\$1,000	D	Senate	CA	6
Vidak	Andy	Andy Vidak for Senate 2018	2018	\$2,000	R	Senate	CA	14
Landry	Jeff	Landry for Louisiana	2018	\$2,500	R	Attorney General	LA	
Edwards	John	John Bel Edwards Campaign	2018	\$5,000	D	Governor	LA	
Duncan	Wes	Committee to Elect Wes Duncan	2018	\$2,500	R	Attorney General	NV	
Laxalt	Adam	Laxalt for Nevada	2018	\$2,500	R	Governor	NV	
Sisolak	Steve	Committee to Elect Steve Sisolak	2018	\$2,500	D	Governor	NV	
Frierson	Jason	Committee to Elect Jason Frierson	2018	\$1,000	D	House	NV	8

CANDIDATES

Last Name	First Name	Political Committee	Cycle	Amount	Party	Office	State	District
Sprinkle	Michael	Sprinkle for Assembly	2018	\$1,000	D	House	NV	30
Kieckhefer	Ben	Committee to Elect Ben Kieckhefer	2018	\$1,000	R	Senate	NV	16
Seward	James	Friends of Senator Seward	2018	\$2,000	R	Senate	NY	51
Kotek	Tina	Friends of Tina Kotek	2018	\$1,000	D	House	OR	44
Williamson	Jennifer	Friends of Jennifer Williamson	2018	\$1,000	D	House	OR	36
Reyes	Sean	Friends of Sean Reyes	2018	\$5,000	R	Attorney General	UT	
Wilcox	JT	Committee to Elect JT Wilcox, The	2018	\$1,000	R	House	WA	2

STATE COMMITTEES

Committee	Cycle	Amount	Party	State
FairPAC	2018	\$2,500	N/A	CA
Making California Work Committee	2018	\$2,000	D	CA
Republican State Leadership Committee	2018	\$10,000	R	DC
House Republican Campaign Committee	2018	\$3,500	R	MO
House Victory Committee	2018	\$250	D	MO
Majority Forward	2018	\$1,000	D	MO
Missouri Senate Campaign Committee	2018	\$4,000	R	MO
New York State Democratic Assembly Campaign Committee	2018	\$1,000	D	NY
New York State Democratic Senate Campaign Committee	2018	\$1,000	D	NY
New York State Senate Republican Campaign Committee	2018	\$1,000	R	NY



Direct and Contracted Lobbying Activities and Registrations

Mallinckrodt is required to report the sum of our federal lobbying activities on a quarterly basis to the Clerk of the U.S. House of Representatives and to the Secretary of the U.S. Senate. Included in the amounts disclosed is the value of labor hours spent on lobbying activities by all relevant company representatives. Registered state lobbyists working on behalf of Mallinckrodt are required to fulfill all reporting requirements as defined by each state. In a majority of 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.

In 2018, Mallinckrodt spent a total of \$1,620,000 on federal lobbying expenses³ and \$1,522,130.50 on state lobbying activities.⁴ The goal of these activities was to advocate for a policy environment that supports research, innovation and patient access to medicine, as well as certain other corporate priorities, such as policies that support diversity and inclusion.

³ Includes certain trade association dues, as required by the Lobbying Disclosure Act.

⁴ Excludes certain miscellaneous expenses that are negligible to the total spend.

2018 MEMBERSHIPS

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 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 Mallinckrodt's voice is heard on important policy issues concerning our business, employees and patients.

2018 TOTAL MEMBERSHIPS

\$2,277,403

36 organizations



POLITICAL ORGANIZATIONS

\$594,500

13 organizations



TRADE ASSOCIATIONS & POLICY ORGANIZATIONS

\$1,682,903

23 organizations



POLITICAL ORGANIZATIONS

Organization	Funding	Organization	Funding
American Legislative Exchange Council*	\$12,000	Republican Attorneys General Association	\$100,000
Conference of Western Attorneys General	\$15,000	Republican Governors Association	\$100,000
Democratic Attorneys General Association	\$100,000	Republican Legislative Campaign Committee	\$50,000
Democratic Governors Association	\$100,000	Republican Secretaries of State Committee	\$5,000
Democratic Legislative Campaign Committee	\$50,000	The Ripon Society	\$15,000
Franklin Center	\$20,000	Western Governors Association	\$15,000
National Conference of State Legislatures	\$12,500		



TRADE ASSOCIATIONS & POLICY ORGANIZATIONS

Organization	Funding	Organization	Funding
BIOCOM	\$9,600	National Association of Manufacturers	\$59,039
BioForward	\$5,000	National Pharmaceutical Council	\$325,000
Biotechnology Innovation Organization	\$355,418	New Jersey Business & Industry Association	\$1,800
Business Roundtable	\$100,000	North Carolina Chamber	\$11,340
California Biotech Foundation	\$10,000	Organization for International Investment	\$17,500
Carolina Leadership Coalition	\$5,000	Research! America	\$15,000
Chemical Industry Council of Illinois	\$2,041	Somerset County Business Partnership	\$2,900
Confederation of British Industry	\$41,515	St. Louis Regional Chamber of Commerce	\$75,000
HealthCare Institute of New Jersey	\$50,000	U.S. Chamber Institute for Legal Reform	\$250,000
Healthcare Leadership Council	\$200,000	Women in Government	\$20,000
Institute for Clinical and Economic Review	\$100,000	World Trade Center St. Louis	\$1,750
Missouri Chamber of Commerce	\$25,000		

* Mallinckrodt did not renew membership in 2019.



INTERNATIONAL ACTIVITIES

Mallinckrodt's global corporate headquarters is located in Staines-upon-Thames, United Kingdom (UK). Additionally, the company has a major research and manufacturing center outside of Dublin, Ireland, and significant business operations in other parts of Europe and the Asia-Pacific region, as well as Canada. As such, we may engage with political and policy advisors on a periodic basis to help us navigate regional or national policy environments with respect to issues that may affect the company's corporate or business activities, and build positive relations with the communities in which our employees live and work. Recent examples of these activities involve monitoring and analysis of the potential effects of the UK's expected departure from the European Union (commonly referred to as BREXIT), certain financial reporting changes in Ireland, as well as the opening of our permanent UK corporate headquarters. Mallinckrodt complies with all applicable rules and laws in the countries in which we undertake political or policy activities.



Mallinckrodt's global corporate headquarters is located in Staines-upon-Thames, UK.



Mallinckrodt
Pharmaceuticals

www.mallinckrodt.com