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About the Mallinckrodt Integrity Hotline

What is the Integrity Hotline?

The Integrity Hotline utilizes the EthicsPoint system, which is a comprehensive and confidential reporting tool created by NAVEX that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment.

Why do we need the Integrity Hotline?

- Our employees are our most important asset and your voice has power. By using one of our Speak Up Channels, we promote a positive work environment and maximize productivity.
- An effective reporting system augments our efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. The Integrity Hotline enables you to file a confidential, anonymous report via either the telephone or the Internet.

What types of situations should I report?

The Integrity Hotline allows employees to Speak Up and report any violation of our stated Code of Conduct, policies, procedures, industry codes, laws, regulations, or other matters you may have. This includes if something just does not feel right or if you are concerned about someone else's actions. Use one of our Speak Up channels or the Integrity Hotline.

Do I need to be sure of the situation before making a report?

You don't have to be sure and you don't need to collect proof or substantiate your concern. Just let us know.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

Your voice has power. When you observe behavior that you believe violates our code of conduct, we expect you to report it. You can use any one of our Speak Up channels:

- Any Company manager, including your own
- Integrity & Compliance
- Legal Department
- HR Business Partner
- Internal Audit
- Integrity Hotline

We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have the Integrity Hotline. We would rather you report anonymously (where allowed by law) than keep the information to yourself.

Why should I report what I know? What's in it for me?

You Can Make a Difference

Raising a concern helps us stop misconduct or, in some cases, prevent it from happening in the first place.

Speaking up can make a huge difference for the Company and the individuals involved.

Does management really want me to report?

If You Speak Up, We Will Listen

Our commitment to patients drives our business. Our commitment to integrity drives our reputation.

Violations of our Code or other Policies undermine our shared values and pose risk to the Company and our employees. We simply can't allow them to go unaddressed.

We know speaking up can feel difficult. Know that we will not tolerate any form of retaliation.

Where do these reports go? Who can access them?

Mallinckrodt Integrity Hotline reports are entered directly on the EthicsPoint secure server. These reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence. Data Privacy rules and regulations are applied.

Reporting Security & Confidentiality

Can I file a report from home and still remain anonymous?

Where anonymous reporting is allowed by applicable law, a report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide Mallinckrodt Integrity Hotline will ultimately reveal my identity. How can you assure me that will not happen?

The Mallinckrodt Integrity Hotline protects your anonymity. However, if you wish to remain anonymous (where applicable by law), you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

Is the telephone toll-free hot line confidential and anonymous too?

Yes, where applicable by law. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the Integrity Hotline Web site. These reports have the same security and confidentiality measures applied to them during delivery.

Tips & Best Practices

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the Mallinckrodt Integrity Hotline Web site or through the Call Center, you receive a unique, randomized number called a “Report Key” and are asked to choose a password. You can return to the Mallinckrodt Integrity Hotline system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an “anonymous dialogue,” where situations are not only identified but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All Integrity Hotline correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of confidentiality.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

Can I still file a report if I don't have access to the Internet?

You can file a Mallinckrodt Integrity Hotline report from any system (i.e., your phone or computer) that can access the Internet. You can file from home or any public location, including the public library, with Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the Mallinckrodt Integrity Hotline toll-free hotline, which is available 24 hours a day, 365 days a year.