



INFORMATION REGARDING CERTAIN TAX CONSEQUENCES OF THE MERGER

PLEASE REFER TO PAGES 171 to 183 OF THE REGISTRATION STATEMENT FILED BY MALLINCKRODT PUBLIC LIMITED COMPANY ON AMENDMENT NO. 1 TO FORM S-4 AS FILED WITH THE SEC ON JULY 11, 2014 (REG. NO. 33-196054) (THE "REGISTRATION STATEMENT") FOR INFORMATION ON THE TAX CONSEQUENCES OF THE MERGER TO U.S. HOLDERS AND NON-U.S. HOLDERS OF QUESTCOR COMMON STOCK.

QUESTCOR SHAREHOLDERS SHOULD CONSULT WITH THEIR TAX ADVISORS REGARDING THE TAX CONSEQUENCES OF THE MERGER AND OF THE OWNERSHIP AND DISPOSITION OF MALLINCKRODT ORDINARY SHARES AFTER THE MERGER TO THEM, INCLUDING THE EFFECTS OF U.S. FEDERAL, STATE AND LOCAL, AND OTHER TAX LAWS AND ANY APPLICABLE INFORMATION REPORTING OBLIGATIONS.

Fair Market Value of Mallinckrodt Ordinary Shares at the Effective Time of the Merger

Mallinckrodt intends to take the position for tax reporting purposes that the fair market value of the Mallinckrodt plc stock issued as merger consideration had a value of \$70.88 per share, the closing price on August 14, 2014, at the effective time of the Merger.