



Code of Conduct

Telix Pharmaceuticals Limited
ACN 616 620 369

Adopted by the Board on 20 August 2020

1 Purpose of the Code of Conduct

Telix Pharmaceuticals Limited (the **Company**) is committed to conducting business in an open and accountable way. We aim to instill and maintain corporate governance practices that are rigorous and of a high standard and that assist in ensuring the delivery of shareholder value.

Telix's vision is to become a global leader in the delivery of disruptive precision oncology products. The purpose of our Code of Conduct (the **Code**) is to set standards for the way we work at Telix, and to provide a statement of our values to anyone dealing with Telix.

The Code is also underpinned by the Company's values to:

- Be collaborative: Through collaboration, we multiply our contribution to the delivery of our goals and to improving the lives of those living with cancer.
- Be innovative: We implement new ideas and technologies to meet our goals and the unmet medical needs of people living with cancer.
- Act with integrity: We are trustworthy and reliable, we practice and encourage open communication, we are responsible for our actions.
- Work with passion: We are passionate about delivering on our goals and improving the lives of people living with cancer.
- Demonstrate respect: We respect our colleagues, our collaborators, our mentors, and the collective contribution of experts in our field.

The Code forms part of the Company's risk management framework.

2 Who the Code applies to

All Telix employees must comply with the Code. A reference to 'employees' includes temporary employees, contractors, directors, officers, consultants and other persons who act on behalf of the Company or related bodies corporate or affiliates of the Company. References to the Company in the Code include references to the Company's related bodies corporate and affiliates.

3 Your obligations

3.1 Overarching principles of the Code

You are expected at all times to act consistently with the values, commitments and ethical standards as set out in the Code. You must:

- act in a way guided by Telix's values, including acting in the best interests of Telix and with honesty and integrity
- comply with the laws and regulations which apply to Telix and its operations
- comply with this Code and the other policies and procedures of Telix
- disclose material personal relationships, including intimate relationships, you may have with Telix staff, our collaborators, business partners, customers and/or suppliers
- immediately report any concern about a possible breach of the Code
- not knowingly participate in any illegal or unethical activity
- not enter into any arrangement or participate in any activity that would conflict with the interests of Telix
- not act in a way which would be likely to negatively affect Telix's reputation
- not take advantage of Telix's property or information or your position (or opportunities arising from these) for personal gain or to compete with Telix
- not take advantage of or misuse a third party's property or information

Failure to comply with the principles, standards or spirit of the Code will result in disciplinary action, up to and including the termination of your employment or engagement with the Company.

3.2 Care and Diligence

You must exercise your powers and discharge your duties and the obligations set out in this Code with high standards of professionalism, care and diligence. This includes seeking to ensure the accuracy of all information provided or shared in the ordinary course of business, attending to detail in all aspects of your work, preserving and enhancing the Company's reputation, ensuring that matters are brought to the attention of senior management where appropriate, and at all times acting in accordance with Telix values.

3.3 Conflicts of Interest

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of the Company. Personal interests include direct interests, as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder). A conflict of interest may be actual, potential or perceived and may be financial or non-financial. You must at all times manage real or perceived conflicts of interest.

3.4 Confidentiality

In the course of your employment or engagement with Telix, you may come across private and confidential information. Telix is committed to maintaining the confidentiality and security of this information, and you therefore must not breach your confidentiality obligations to Telix. In addition, you must treat confidential information belonging to a third party that you may obtain in the course of your duties consistently with your confidentiality obligations to Telix, as if that information was confidential information of Telix.

You must not seek to obtain confidential or sensitive information which is not relevant to the performance of your duties. You must also protect the confidentiality of information by complying with the Company's Clear Desk Policy contained in the Company's employment-related policies.

Any questions regarding confidential information should, prior to accessing, using or sharing the information, be directed to your manager.

3.5 Fair and Safe Work Environment

Telix is committed to providing our diverse workforce with a fair, inclusive and safe work environment. Telix values define the way we interact with each other, our customers and our stakeholders. In addition to dealing with all people in a manner consistent with our values, you must comply with all relevant laws and regulations concerning your employment. Any act of sexual or other form of harassment or discrimination will be regarded as a direct breach of this Code.

3.6 Gifts and Payments

Integrity and trust are inconsistent with improper payments, benefits, gifts or gains of any kind. Care must be exercised in accepting hospitality, entertainment or gifts over and above that required for the normal conduct or business or which may compromise your impartiality. You must obtain proper approval for, and properly record, any donations, sponsorships, gifts and entertainment you accept from, or give to, third parties on behalf of the Company that are over and above that required for the normal conduct or business. If in doubt, discuss with your manager or the Company Secretary.

A number of countries, including Australia, have strict laws against bribery and corruption. The anti-bribery laws of some countries including Australia, the United States and United Kingdom can apply to things done in other countries (i.e. they have wide-reaching extra-territorial effect). You must comply with and uphold all laws against bribery, corruption and related conduct applying to the Company in all the jurisdictions where the Company operates. The Company will report any actual or intended bribery or corruption to the appropriate law enforcement agencies.

3.7 Fraud, Corruption, Use of Company Property

You must acquire, maintain and use Company property only for legitimate Company business purposes.

You must at all times act honestly and with integrity and safeguard the Company's resources for which you are responsible, and must not engage in any conduct which is, or could be seen to be, fraudulent or corrupt. The Company is committed to protecting all revenue, expenditure and assets from any attempt to gain illegal financial or other benefits.

3.8 Other Policies Regulating Employee Behaviour

You are required to comply with all Telix governance and employment-related policies located on the Company's intranet as amended from time to time.

4 Breaches or suspected breaches of the Code

4.1 Reporting channels

Should you have a concern about a possible breach of the Code, you must immediately report it to your manager. Any material reports of possible breaches of the Code will be forwarded to and reviewed by the Company Secretary and will be reported to the Board.

The procedures for reporting any concern about a possible breach of the Code to anyone other than your manager are set out in the Company's [Whistleblower Protection Policy](#) available on the Company's intranet and website. The Whistleblower Protection procedures provide for a staged escalation in a manner intended to ensure that employees are not disadvantaged in any way for reporting such concerns, that the matter is dealt with promptly and fairly, and that sensitive information is dealt with appropriately.

4.2 Investigations

Preliminary investigations of reported breaches are administered by the Company Secretary. If a breach of the Code is found to have occurred, a formal investigation process will be administered by the Company Secretary in consultation with the manager of the offending person. Breaches of the Code will be reported to the Board.

The Company will conduct an annual review of any reports of breaches of the Code with the aim of ensuring that all reports have been appropriately recorded, investigated and responded to. Following the annual review, the Company will assess whether any changes are required to be made to the Company's procedures surrounding such reporting.

4.3 Consequences of breaching the Code

The highest standards of corporate conduct are critical to the Company's success and reputation.

The Company recognises that breaches of the Code may occur from time to time. We expect that any breach will be inadvertent and without intent, however it should be clearly understood that any breach may result in disciplinary action or other penalties.

Depending on the nature of the breach, these penalties may range from counselling to dismissal or termination of the contract or engagement. The Company will act objectively and in accordance with any applicable provisions or requirements in an employment contract.

The Company reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of the law.

5 Promoting and publishing the Code

The Company promotes and monitors compliance with the Code by providing education on this and other Company policies on a regular basis and by monitoring and conducting reviews of activities and policies.

6 Who to speak to if you have questions

The Code of Conduct does not include every ethical issue that an employee might face, nor every law and policy that applies to the Company. In representing the Company you are expected to act in a manner consistent with the key values underpinning the Code of Conduct, namely:

- (a) our actions must be governed by the highest standards of integrity and fairness;
- (b) our decisions must be made in accordance with the spirit and letter of the applicable law; and
- (c) our business must be conducted honestly and ethically, with our best skills and judgment, and for the benefit of customers, employees, shareholders and the Company alike.

If you have any questions regarding this Code of Conduct or any of the Company's policies, you should contact the Company Secretary.