



Anti-Bribery and Corruption Policy

Telix Pharmaceuticals Limited
ACN 616 620 369

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Contents

- 1. Introduction 1
- 2. Scope 1
- 3. Summary of prohibited conduct..... 1
- 4. Prohibition against Bribes or Facilitation or Acceleration Payments 2
- 5. Situational examples 2
- 6. Exception to the Prohibition..... 4
- 7. Books and records..... 4
- 8. Gifts and Hospitality guidelines 4
- 9. Charitable or political donations 5
- 10. Engaging agents..... 5
- 11. Compliance and reporting 6
- 12. Review of Policy 6
- 13. Definitions..... 6
- 14. Annexure - Australia 8
- 15. Annexure - United Kingdom 9
- 16. Annexure - Hong Kong 10
- 17. Annexure - USA..... 11
- 18. Annexure - Japan 12
- 19. Annexure - Belgium..... 13

1. Introduction

Telix Pharmaceuticals Limited, including all of its subsidiaries and affiliates (together, “Telix” or the “Company”), is committed to conducting its business and operations with honesty, integrity and the highest standards of personal and professional ethical behaviour. It has zero tolerance for bribery and corruption in any form.

This Policy sets out Telix's anti-bribery and corruption rules to ensure the Company's compliance with the local anti-bribery and corruption legislation and regulations, namely the Criminal Code Act 1995 (Cth) and the legislation in the various States and Territories of Australia. Where any actions are undertaken by or on behalf of Telix in, or in connection with, another jurisdiction then the anti-bribery legislation in that jurisdiction must also be complied with including (but not limited to) the UK Bribery Act and the US Foreign Corrupt Practices Act both of which can apply to acts committed anywhere in the world.

This Policy should be read together with Telix's Code of Conduct. Interactions with healthcare professionals both in the public and private sector, must comply with this Policy but also with any other Telix policies in relation to interactions with healthcare professionals.

2. Scope

This Policy applies to all Directors, officers, senior management and other employees, consultants and contractors of the Group (collectively, **Employees**) and agents of the Group. The Policy applies across all entities of the Telix Group. It is mandatory for all Employees and agents to understand and comply with this Policy.

This Policy must be complied with in all of commercial dealings including (but not limited to) interactions with customers, retailers, local authorities, government bodies, subcontractors and service providers.

All individuals, regardless of their position, are responsible for their own behaviour and the consequences of their actions and decisions.

An Employee that engages in prohibited conduct may be liable for disciplinary or administrative action, and in some cases, legal proceedings and investigation/prosecution by the relevant government authorities.

In addition, pursuant to the laws and regulations in certain jurisdictions, Telix can be held liable for the conduct of its Employees and third parties (such as its agents, intermediaries and consultants) when their actions are carried out within the scope of their employment or business relationship with the Company and benefit the Company to any extent. Therefore, and depending on the jurisdiction, non-compliance with this Policy and applicable laws and regulations can expose the Company to regulatory risk and legal liabilities, as well as potentially exposing individuals to criminal and civil liability.

3. Summary of prohibited conduct

Employees and agents of Telix must not, either directly or indirectly:

- (a) offer, promise, give, solicit, accept or request any Bribe, Facilitation or Acceleration Payments (section 4);
- (b) falsify any books, records or accounts relating to Telix (section 7);
- (c) offer or provide Gifts, Hospitality or any other benefit to Public Officials without prior written approval of the General Counsel of Telix, or provide any Gifts or Hospitality which does not comply with the Gifts and Hospitality Guidelines (section 8);
- (d) make any political or charitable donations on behalf of Telix which are or could be perceived to be a Bribe (section 9);
- (e) engage with or deal with third parties or agents acting for or representing Telix in a manner contrary to this Policy (section 10). This includes the prohibition of offering or giving secret commissions to those acting in an agency or fiduciary capacity; and
- (f) cause, authorise or wilfully ignore any conduct that is believed or suspected to be contrary to this Policy or any anti-corruption laws, or to aid or abet such conduct. Any notice of such conduct or suspected conduct must be immediately reported to the General Counsel (section 11).

There are serious criminal and civil penalties, including fines and imprisonment, that may be incurred, and significant reputational damage that may be done, if Telix or any of its Employees or agents are involved in bribery or corruption related conduct.

If there is any doubt about whether a particular conduct may violate this Policy, or if there are any questions about the application of the Policy, you should contact your manager (or alternatively, the General Counsel) for clarification.

4. Prohibition against Bribes or Facilitation or Acceleration Payments

- 4.1 It is not permitted to promise, offer, provide (or cause to be provided) any Bribe or Facilitation or Acceleration Payment, whether directly or indirectly, with the intention of securing business or a commercial advantage for Telix.
- 4.2 This prohibition applies to dealings with private and public businesses and individuals, as well as Public Officials.
- 4.3 When dealing with Public Officials, particular care must be taken. Employees are prohibited from providing any Benefit to any Public Official while Telix is having dealings of any kind with that Public Official's Government Body. Any benefits (including Hospitality or Gifts) offered or provided to a Public Official must be in compliance with this Policy and with the Gifts and Hospitality Guidelines and can only be made with the prior written approval from Telix's General Counsel irrespective of amount and even if they otherwise come within the limits in Annexure A.
- 4.4 There will be no penalty or adverse consequences for refusing to pay a Bribe, Facilitation or Acceleration Payment, even if it may result in Telix losing business.
- 4.5 It is also not permitted to accept or request any benefit from any person, such as a supplier, in return for doing or not doing something in relation to Telix's business such as agreeing to renew a contract or giving information to the supplier about a competitor's pricing.

5. Situational examples

If an Employee or agent suspects that a situation they are involved in may result in a breach of the Policy, they should either seek guidance from General Counsel or respectfully decline to act in a manner as proposed and promptly report the circumstances to their supervisor or General Counsel.

Scenario	Recommended response
Telix is in the process of obtaining tenders for its IT services from a number of service providers. One service provider invites a Telix executive and some employees to attend a major sporting event final which includes dinner and champagne at a 5 star	The employees and the executive should decline attending the event or the meal (which is taking place so close to the tender process) as this could be perceived to be a Bribe. If in doubt seek guidance from the General Counsel.

Scenario	Recommended response
<p>restaurant and which is to take place just before the tender process concludes.</p> <p>What should the employees do?</p>	
<p>Telix is submitting an urgent application for development approval for a new premises. While lodging the application at the local Council's office, a Council staff member mentions the application would not be processed for another 4 weeks due to a backlog of other applications.</p> <p>The Employee asks if there is an urgent fee that could be paid to "speed things up" and have the application brought to the top of the pile.</p> <p>Is this permitted under the Policy?</p>	<p>If the fee is a payment that will be paid to the proper authority and if there is an official process which allows applications to be processed more quickly by the payment of a published fee, then the payment is acceptable. An official receipt for the payment should be obtained and included in the Company's books and records. The payment should not be made in cash.</p> <p>However, if, for example, this is a payment that will benefit the Council staff member personally and/or if it is not an official process then this is not acceptable and it should not be paid.</p>
<p>We have just closed a large deal and we wish to invite the other party to a restaurant to celebrate and to get to know all the members of their team that we will be dealing with during the contractual term.</p> <p>Is this permitted under the Policy?</p>	<p>If this meal is part of a business relationship, and is not a benefit that had been promised in advance for the award of the contract, this meal/outing would be appropriate. However, the celebration should be within the financial limits set out in this Policy or subject to the prior approval by General Counsel if exceeding those financial limits and should not be lavish or at a venue which might cause reputational damage to Telix.</p>
<p>A number of healthcare professionals are interested in being involved in a clinical trial of a new product. It is decided to get the healthcare professionals and relevant Telix staff together to discuss the trial and because the healthcare professionals come from a number of different states it is decided that the meeting should take place in a luxury hotel with the healthcare professionals flights and 3 nights of accommodation and food paid for by the Company.</p> <p>Is this permitted under the Policy?</p>	<p>Travel and hospitality can create the impression of improper influence and particular care must be taken when dealing with healthcare professionals some of whom could be considered to be public officials and may be subject to specific and stricter anti-bribery rules, even if they are not considered to be public officials. Any travel and accommodation must only be for the duration that is necessary for the business issues and must not be lavish. Employees must obtain receipts for any travel and hospitality offered to non-Telix persons, and such receipts must be kept in the Company's books and records. Only the professionals at stake should be invited, at the exclusion of their partners or relatives.</p> <p>The written approval of the General Counsel would be required for any such proposal.</p>
<p>Telix's current main IT supplier invites the head of procurement and their partner to the Semi-Final of a major tennis tournament.</p> <p>Can they accept the invitation?</p>	<p>It could be a breach of this Policy and a criminal offence to accept a benefit such as this if it is being offered in return for any action or decision in relation to the business. Particular care must be taken if a procurement decision is pending. As a rule, invitations extended to partners or relatives is more likely to be considered as a bribe.</p> <p>Given the value of this invite the written approval of General Counsel would be required.</p>

Scenario	Recommended response
<p>You are under pressure to meet your monthly sales target and there are a group of healthcare professionals who you think may be interested in Telix's services. You arrange a meeting with them to discuss the product followed by lunch at a moderately priced restaurant and suggest that if they commit to purchase by the end of the month you will send them an expensive bottle of wine.</p> <p>Is this acceptable behaviour?</p>	<p>The meeting and lunch may be acceptable if the purpose of the lunch is to further discuss the product (i.e. if the meeting and lunch are for a legitimate business purpose) but if the cost per person is likely to exceed the amounts in Annexure A then written pre-approval must be obtained from the General Counsel.</p> <p>The promise of an expensive bottle of wine in return for an order is not acceptable.</p>

6. Exception to the Prohibition

- 6.1 A person will not be in breach of this Policy if a payment or benefit is provided to a Public Official or another third party, due to an imminent risk of serious physical harm. The same will generally also allow to avoid criminal prosecution.
- 6.2 Where possible any such exception should be discussed first with General Counsel and/ or the Chief Executive Officer.
- 6.3 In any event, where a payment or benefit is provided under such circumstances, that person must promptly report the payment or benefit made to the General Counsel and set out the full circumstances of that payment (including the value of the payment, the recipient and the nature of the threat).

7. Books and records

- 7.1 Telix must maintain accurate records and accounts of all its transactions. This means that all transactions involving Telix's funds must be properly authorised and recorded. Any falsification or mis-description of Telix's records, accounts or any other documents in respect of which Telix is interested, is strictly prohibited.
- 7.2 All invoices, agreements, receipts and expenditure approvals must be accompanied by supporting documents which accurately describe the transaction or accounts.

8. Gifts and Hospitality guidelines

- 8.1 Gifts, presents, hospitality and entertainment offered for the purpose of establishing and strengthening business relationships are acceptable from a commercial perspective and are not a breach of this Policy. However it becomes a breach of this Policy and a criminal offence when such gifts, hospitality and entertainment are offered in order to influence the other party to obtain a benefit.
- 8.2 Hospitality and entertainment should not be lavish and should always be at venues which are conducive to business conversations and which would not negatively affect the reputation of Telix.
- 8.3 The giving and acceptance of gifts should be limited and never be given for the purpose of obtaining or retaining business or accepted in return for any action or business decision.
- 8.4 The financial thresholds and approval guidelines for Gifts and Hospitality for the different jurisdictions in which Telix currently operates are set in Annexure A. For other jurisdictions, any thresholds mandated by that jurisdiction must be applied or if there are no officially mandated limits then the Annexure A limit most applicable to that jurisdiction should be applied. In most jurisdictions there is no minimum threshold for the gifts, presents, hospitality and entertainment to qualify as a bribe, and therefore even gifts and hospitality below the levels set out in Annexure A could be considered to be bribes if given with an improper intent.
- 8.5 **(Frequency)** Gifts and/or Hospitality also should not be received by or given to the same person more than more than 4 times a year in order to avoid creating the perception of impropriety. Approval from the General Counsel is required to exceed this limit. The offer, promise, gift, solicitation, acceptance or request of a Bribe, Facilitation

or Acceleration Payment does not need to be repeated or frequent a to qualify as a bribe but small frequent amounts are likely to risk being considered to be a bribe.

- 8.6 **(Timing)** Gifts and/or Hospitality may be acceptable or unacceptable depending on when they are received or given. Gifts should not be given or received just before a business decision is to be made (for example, prior to the award of or tender for a contract) in order to avoid creating the perception of impropriety.
- 8.7 All offers and acceptances of Gifts and Hospitality should be recorded in the Gifts Register and each entry must indicate whether the gift was accepted or declined. Promotional items of a nominal value such as pens, drink bottles etc. are generally exempt but for healthcare professionals these may not be permitted in some jurisdictions and any other Telix policies in relation to interactions with healthcare professionals must be complied with.

9. Charitable or political donations

9.1 Charitable donations

- (a) Charitable donations can be used as a form of Bribe. Therefore charitable donations must not be made, offered or promised on behalf of Telix, without prior written approval from the General Counsel, and in compliance with this Policy. All due diligence in relation to charitable donations, along with the relevant details of the donations, must be recorded in the Donations Register.
- (b) Employees are permitted to make charitable donations in their personal capacity so long as they are not made in order to obtain or retain any business or business advantage.

9.2 Political donations

- (a) Any financial or other support or assistance to, including a gift offered or provided to or for the benefit of, political parties, political campaigns, individual politicians, government departments or administrative bodies on behalf of Telix can only be made if permitted under the laws of the applicable jurisdiction with written approval from the General Counsel and if the necessary limits on amounts and disclosure requirements in each jurisdiction are complied with. This requirement for approval includes the provision or sponsoring of food, drink or entertainment to political parties, political campaigns, individual politicians, government departments or administrative bodies as in some jurisdictions this is prohibited.
- (b) A political donation includes payments such as memberships, entry fees and tables purchased at political fundraising events.
- (c) Employees are permitted to make political donations in their personal capacity so long as they are not made in order to obtain or retain any business or business advantage and are permitted under the law of the applicable jurisdiction.

10. Engaging agents

- 10.1 Any Employee that deals with agents is responsible for taking reasonable precautions to ensure that those agents are ethical in their conduct of business and compliant with this Policy.
- 10.2 Payments to agents may only be made upon the presentation of a valid invoice or statement that evidences the services were provided. Any commissions or service fees made to agents should be comparable to the prevailing market rates for similar services. Any contracts with agents must include anti-bribery clauses requiring the agent to comply with all relevant anti-bribery legislation and to provide Telix with audit rights.
- 10.3 The offering or giving of Secret Commissions is prohibited. Likewise, the receipt of any Secret Commissions is also prohibited.
- 10.4 It is important for Telix to ensure that a fulsome due diligence review of agents is undertaken prior to any engagement.
- 10.5 If there are any concerns or red flags about the conduct of agents in their business dealings that may be contrary to this Policy, such concerns must be reported to the General Counsel prior to proceeding or continuing with the engagement to ensure compliance with the applicable anti-bribery and corruption laws.
- 10.6 Some examples of red flags could include:
- unusual or excessive payment requests, including upfront payments, suspicious commissions or payments into separate accounts in a country foreign to the nationality or business of that third party;

- reluctance or refusal by that third party to disclose the company's beneficial owners, partners or principals;
 - the third party has little experience in the industry but "knows the right people";
 - the third party is not qualified or lacks the necessary experience, infrastructure and resources to perform the functions for which it has been hired or retained;
 - the third party was recommended by a Public Official;
 - the third party has a personal family or business relationship with a potential customer;
 - the third party has been accused of engaging in improper business practices;
 - the third party is currently involved in or has previously been involved in investigations relating to corruption, fraud or other malfeasance;
 - the third party has a reputation in the business community for paying bribes or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with Public Officials; or
 - the third party requests political or charitable donations or other favours as a way of influencing official action.
- 10.7 Upon receiving a report, Telix shall conduct relevant investigations and may suspend further payments to the agent pending the outcome of any investigation.

11. Compliance and reporting

- 11.1 All Employees and agents must read, understand and comply with this Policy and they will be required to ensure they avoid any actions that may lead to or suggest a violation of this Policy.
- 11.2 Employees and agents will be required annually to certify that they are not aware of any breach of this Policy.
- 11.3 Telix will also offer periodic training to ensure that all Employees and agents are up-to-date on their obligations under the Policy and the relevant anti-corruption laws. All Employees and agents must participate in such training whenever they are requested to attend. Such training will include, but is not limited to, the following:
- (a) the obligations of Employees under this Policy;
 - (b) how to recognise bribery and corruption; and
 - (c) how to effectively deal with and report bribery, corruption or other breaches of this Policy.
- 11.4 Any Employees and agents that becomes aware of or suspects the Policy has been breached by any person acting for or on behalf of Telix, must report the known or suspected breach to the General Counsel and include the basis for their suspicion and/or knowledge. Reports may be made confidentially and on an anonymous basis. Please refer to the Whistleblower Protection Policy for more details.
- 11.5 Any Employee or agent that breaches this Policy or fails to report known or suspected breaches of the Policy will face disciplinary action which may result in dismissal for misconduct. Any Employee or agent that breaches this Policy may also face legal proceedings and may be subject to investigation/prosecution by relevant government authorities.

12. Review of Policy

Telix will periodically review this policy to ensure it is operating effectively and determine whether any changes to the Policy are required

13. Definitions

- 13.1 **Benefit** includes any advantage and is not limited to property. It can include (but is not limited to) cash, vouchers, Gifts or Hospitality to family members, loans, personal favours, entertainment, meals and travel, political and charitable contributions, business opportunities (including job or internship offers) and medical care.
- 13.2 **Bribe or Bribery** means for a person, either in its own name or on behalf of another person to provide, promise, offer or cause a Benefit to be provided to another person, either directly or indirectly, for another person's benefit or for the benefit of any third party, in order to cause him/her to perform or to omit any act falling within the scope of his/her duties with the intention to influence that person to obtain or retain a benefit or business advantage that is not legitimately due. For the purpose of determining if a benefit or business advantage is legitimately due, these circumstances should be disregarded: (i) the fact that the benefit or business advantage may be (or be perceived

to be) customary, (ii) the value (alone or in combination) of the benefit or business advantage and (iii) official tolerance of the benefit or business advantage.

- 13.3 **Facilitation or Acceleration Payment** means unofficial payments of small sums to induce a Public Official to facilitate or accelerate the performance of a non-discretionary government functions, such as issuing licences or permits to obtain routine services.
- 13.4 **Gift(s)** means free or heavily discounted items, money or other intangible benefits offered in relation to work activities. Examples include, but are not limited to a gift basket, gift vouchers, shopping cards, wine, tickets to a sporting event or concert, or any other item of value.
- 13.5 **Government Body** means any national, local, supranational or municipal government body and includes a foreign Government Body and also includes state owned or controlled entities.
- 13.6 **Hospitality** means any form of entertainment including, but not limited to, meals, drinks, sporting events, movie or theatre visits and hotel accommodation and includes any travel associated with that hospitality.
- 13.7 **Public Official** means employees or officers of any rank of a Government Body including individuals who perform work under contract for a Government Body or hold or perform the duties of an appointment, office or position of a Government Body. This includes employees or officers of government owned or controlled enterprises such as public institutions and state owned enterprises, including private companies or a private person, entrusted with a public service mission; Examples of Public Officials include employees of health authorities, doctors in public hospitals, planning officers or other employees of local planning authorities, council members, police officers, members of judiciary and politicians at any level of government. It includes foreign public officials as well as local public officials.
- 13.8 **Secret Commission(s)** means a situation where an agent, or someone acting in a fiduciary capacity, accepts a commission or other unauthorised payment or benefit from a third party, without the consent or knowledge of their principal, for services rendered or other benefits provided which are connected with the relationship between the agent/fiduciary and their principal. For example, A makes a cash payment to a leasing agent who acts for B (a retail company). B is not aware of the payment by A to the leasing agent. The leasing agent advises B take up a lease at a site which A operates.
- 13.9 **Telix** means Telix Pharmaceuticals Limited each subsidiary or affiliated company of Telix.

14. **Annexure - Australia**

1.1.1 Gifts

Value of Gifts	Procedure
AUD \$50 or less	May be received or given without approval (but subject to any budget or other business considerations). However, consideration must be given as to whether the frequency or timing of the gift(s) may create an appearance of impropriety.
More than AUD \$50	May only be received or given with written approval from the General Counsel. The General Counsel must agree that the gift is within the acceptable business norms and would not create the appearance of improper influence.

1.1.2 Hospitality and Travel

Value of meals, travel and/or entertainment per person	Procedure
AUD \$100 or less	May be received or given without approval (but subject to any budget or other business considerations). However, consideration must be given as to whether the frequency or timing of the hospitality may create an appearance of impropriety.
More than AUD \$100	May only be received or given with written approval from the General Counsel of Telix. The General Counsel must agree that the hospitality is within the acceptable business norms and would not create the appearance of improper influence.

Gifts and/or Hospitality with a combined total value of more than AUD \$500 per year from or to the same person is not permitted. Approval from the General Counsel is required to exceed this limit.

15. Annexure - United Kingdom

Gifts

Value of Gifts	Procedure
GBP30 or less	May be received or given without approval (but subject to any budget or other business considerations). However, consideration must be given as to whether the frequency or timing of the gift(s) may create an appearance of impropriety.
More than GBP30	May only be received or given with written approval from the General Counsel. The General Counsel must agree that the gift is within the acceptable business norms and would not create the appearance of improper influence.

Hospitality and Travel

Value of meals, travel and/or entertainment per person	Procedure
GBP40 or less	May be received or given without approval (but subject to any budget or other business considerations). However, consideration must be given as to whether the frequency or timing of the hospitality may create an appearance of impropriety.
More than GBP40	May only be received or given with written approval from the General Counsel of Telix. The General Counsel must agree that the hospitality is within the acceptable business norms and would not create the appearance of improper influence.

Gifts and/or Hospitality with a combined total value of more than GBP250 per year from or to the same person is not permitted. Approval from the General Counsel is required to exceed this limit.

16. Annexure - Hong Kong

Gifts

It is noted that in Hong Kong there are specific monetary limiting amounts that civil servants can accept as gifts (which currently range between HKD 250 to HKD300 depending on the circumstances. Any such limits must be checked and adhered to [as part of the General Counsel approval required by paragraph 4.3 of this policy].

Value of Gifts	Procedure
HKD300 or less	May be received or given without approval (but subject to any budget or other business considerations). However, consideration must be given as to whether the frequency or timing of the gift(s) may create an appearance of impropriety.
More than HKD300	May only be received or given with written approval from the General Counsel. The General Counsel must agree that the gift is within the acceptable business norms and would not create the appearance of improper influence.

Hospitality and Travel

Value of meals, travel and/or entertainment per person	Procedure
HKD450 or less	May be received or given without approval (but subject to any budget or other business considerations). However, consideration must be given as to whether the frequency or timing of the hospitality may create an appearance of impropriety.
More than HKD450	May only be received or given with written approval from the General Counsel of Telix. The General Counsel must agree that the hospitality is within the acceptable business norms and would not create the appearance of improper influence.

Gifts and/or Hospitality with a combined total value of more than HKD3000 per year from or to the same person is not permitted. Approval from the General Counsel is required to exceed this limit.

17. Annexure - USA

Gifts

Value of Gifts	Procedure
US\$40 or less	May be received or given without approval (but subject to any budget or other business considerations) However, consideration must be given as to whether the frequency or timing of the gifts may create an appearance of impropriety.
More than US\$40	May only be received or given with written approval from the CFO, Telix US. The CFO, Telix US must agree that the gift is within the acceptable business norms and would not create the appearance of improper influence.

Hospitality and Travel

Value of meals, travel and/or entertainment per person	Procedure
US\$60 or less	May be received or given without approval (but subject to any budget or other business considerations) However, consideration must be given as to whether the frequency or timing of the hospitality may create an appearance of impropriety.
More than US\$60	May only be received or given with written approval from the CFO, Telix US. The CFO, Telix US must agree that the hospitality is within the acceptable business norms and would not create the appearance of improper influence.

Gifts and/or Hospitality with a combined total value of more than US\$380 per year from or to the same person is not permitted. Approval from the CFO, Telix US is required to exceed this limit.

18. Annexure - Japan

Gifts

Value of Gifts	Procedure
JPY ¥3,000 or less	May be received or given without approval (but subject to any budget or other business considerations) However, consideration must be given as to whether the frequency or timing of the gifts may create an appearance of impropriety.
More than JPY ¥3,000	May only be received or given with written approval from the General Counsel. The General Counsel must agree that the gift is within the acceptable business norms and would not create the appearance of improper influence.

Hospitality and Travel

Value of meals, travel and/or entertainment per person	Procedure
JPY ¥5,000 or less	May be received or given without approval (but subject to any budget or other business considerations) However, consideration must be given as to whether the frequency or timing of the hospitality may create an appearance of impropriety.
More than JPY ¥5,000	May only be received or given with written approval from the General Counsel of Telix. The General Counsel must agree that the hospitality is within the acceptable business norms and would not create the appearance of improper influence.

Gifts and/or Hospitality with a combined total value of more than JPY ¥30,000 per year from or to the same person is not permitted. Approval from the General Counsel is required to exceed this limit.

19. Annexure - Belgium

Gifts

Value of Gifts	Procedure
EUR50 or less	May be received or given without approval (but subject to any budget or other business considerations) However, consideration must be given as to whether the frequency or timing of the gifts may create an appearance of impropriety.
More than EUR50	May only be received or given with written approval from the CFO, Telix Belgium. The CFO, Telix Belgium must agree that the gift is within the acceptable business norms and would not create the appearance of improper influence.

Hospitality and Travel

Value of meals, travel and/or entertainment per person	Procedure
EUR40 less per person	May be received or given without approval (but subject to any budget or other business considerations) However, consideration must be given as to whether the frequency or timing of the hospitality may create an appearance of impropriety.
More than EUR40 per person	May only be received or given with written approval from the CFO, Telix Belgium. The CFO, Telix Belgium must agree that the hospitality is within the acceptable business norms and would not create the appearance of improper influence.

Gifts and/or Hospitality with a combined total value of more than EUR 175 per year from or to the same person is not permitted. Approval from the CFO, Telix Belgium is required to exceed this limit.