



## **Code of Conduct**

**Telix Pharmaceuticals Limited**  
**ACN 616 620 369**

Adopted by the Board on 12 May 2021  
(as amended 1 June 2021)

## 1 Purpose of the Code of Conduct

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Telix Pharmaceuticals Limited (the **Company**) and its related bodies corporate (together, the **Group**) 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 Group'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

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

In applying the Code Employees are to consider both the 'content' and 'spirit' of the Code, including the Group's values. If you are in any doubt as to the meaning of the Code or its application in any given situation you should seek advice from your Manager or the Company Secretary.

## 3 Conduct to which the Code applies

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This Code applies to conduct occurring both during and outside working hours subject to local laws. For the avoidance of doubt, the Code applies to conduct occurring in any context associated with or related to the Employee's work with Telix (e.g. client and company events such as a training, meetings, entertainment, celebrations and after work drinks).

The expectations and requirements outlined in the Code apply to the way Employees deal with each other, customers and stakeholders in person, as well via technology such as telephone or mobile device, video conferencing, instant messaging, email and social media.

## 4 Status of this document

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The Code does not form part of the terms and conditions of employment for any Employees and is not contractual in nature. However to the extent that the Code requires an employee to do or refrain from doing something, it constitutes a direction from the Company and/or the Group with which the Employee must comply.

Telix may amend, apply, not apply, suspend or revoke this document at its discretion.

## 5 Your obligations

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### 5.1 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 relationships you may have with Telix Employees, collaborators, business partners, customers and/or suppliers
- not knowingly participate in any illegal or unethical activity
- take reasonable steps to avoid any conflict of interest, real or apparent, in connection with your employment
- not enter into any arrangement or participate in any activity that would conflict with the interests of Telix
- conduct yourself in a manner, both within and outside working hours, which would not be likely to negatively impact the integrity or reputation of Telix
- 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
- immediately report any concern about a possible breach of the Code

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

## **5.2 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.

## **5.3 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 avoid real or perceived conflicts of interest and report any such conflicts of interest to your Manager or the Company Secretary immediately.

## **5.4 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.

## **5.5 Fair and Safe Workplace**

Telix is committed to providing our diverse workforce with a workplace that is fair, inclusive and safe. Telix values define the way we interact with each other, with our customers and with our stakeholders. In addition to dealing with all people in a manner consistent with our values, you must at all times comply with all relevant laws and regulations concerning your employment.

"Workplace" means any premises (or part of premises) used for or in connection with work, including any place to which an Employee has access while at work, any room, lobby, corridor, staircase and/or other place used as a means of access to or from the place of work. "Workplace" also includes facilities or situations provided or in use in connection with work, including Group work or social events and/ or travel in connection with work.

## **5.6 Anti-discrimination and anti-harassment**

All Employees are required to comply with laws and Company policies in place to protect people from unlawful discrimination and harassment. It is mandatory for all Employees to read and understand the HR Manual policies on Equal Opportunity, Bullying and Harassment.

Any form of unlawful discrimination, bullying or harassment whether it be physical, sexual or psychological will constitute misconduct and a direct breach of this Code, and will not be tolerated by Telix. Instances of serious misconduct of this nature may result in summary dismissal.

## **5.7 Gifts and Payments**

Improper payments, benefits, gifts or gains of any kind can be a breach of trust and integrity. Care must be exercised in accepting hospitality, entertainment or gifts over and above that required for the normal conduct of 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 of business.

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.

This Code of Conduct should be read together with Telix's Anti-Bribery and Corruption Policy which 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.

## **5.8 Disclosing a consensual personal relationship**

Consensual personal relationships include consensual sexual, intimate and/or romantic relationships between adults of any sex or gender identity. Relationships of this kind may be on a casual, periodic or regular basis and may or may not constitute a primary relationship. A familial relationship of spouse or de facto partner also constitutes a consensual personal relationship.

Consensual personal relationships involving people in a direct hierarchical relationship (i.e. in the same reporting line, where one person has supervisory or decision-making authority over the other) represent a potential conflict of interest. Where such a relationship exists, Employees are required to declare the relationship.

Telix provides multiple avenues for disclosure of consensual personal relationships. Declarations can be made to your Manager, to Human Resources, or to the Company Secretary. The Company Secretary will be made aware of all declarations of consensual personal relationships to help ensure such declarations are recorded and treated appropriately and in line with other governance and group policies. All declarations will be treated with sensitivity and with the overarching aim of protecting privacy.

Personal consensual relationships in the workplace are complex and can have a range of impacts on the workplace and Employees if not managed appropriately. Employees who are in a consensual personal relationship without a direct hierarchical relationship should act professionally at all times and seek to minimise the potential impact in the workplace.

## **5.9 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.

## **5.10 Additional expectations for leaders**

If you set the direction or lead the work of others, Telix expects you to:

- know and meet your accountability obligations under any relevant laws or regulations, including any additional responsibility you may have to support the Group's compliance with relevant laws or regulations

- set clear expectations for your team on the outcomes and behaviour they are accountable for and provide support, recognition, training and clarity on consequences
- exercise best judgement, make timely decisions and be accountable for your team's work. Detecting, escalating and remediating issues are your responsibility
- embed the Code into the operational and people management processes you use in your team, and undertake regular reviews to ensure that execution is in line with the Group's Risk Management Framework
- promote risk awareness and speaking up and the building of constructive relationships across Group teams and functions

#### **5.11 Other Policies Regulating Employee Behaviour**

You are required to comply with all Telix governance and employment-related policies located on the Company's intranet and as amended from time to time, including but not limited to:

- (a) The HR Policy Manual
- (b) The Workplace Health & Safety Policy
- (c) The Anti-Bribery and Corruption Policy
- (d) The Competition Policy
- (e) The Modern Slavery Policy
- (f) The Securities Dealing Policy
- (g) The Privacy Policy

## **6 Breaches or suspected breaches of the Code**

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### **6.1 Reporting channels**

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

If your report relates to a disclosable matter under the Company's [Whistleblower Protection Policy](#) (available on the Company's intranet and website) then you should follow the procedures set out in that policy for reporting any such issue. 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.

### **6.2 Investigations**

The Company may, in its absolute discretion, investigate suspected contraventions of the Code as it considers appropriate in the circumstances. The investigation may be conducted by the Company Secretary in consultation with the manager of the person alleged to be in breach of the Code.

The Company may report contraventions of the Code to the Board.

The Company may 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 may assess whether any changes are required to be made to the Company's procedures surrounding such reporting.

### **6.3 Consequences of breaching the Code**

The highest standards of corporate conduct are critical to the Company's success and reputation. The Company and Group will take any breach of the Code by an Employee seriously.

A breach of the Code by an Employee may result in disciplinary action, including counselling, formal warnings or termination of employment or engagement. The Company may take any action it considers appropriate in the

circumstances and may have regard to any matter in its absolute discretion, including the nature and seriousness of the breach and the Employee's position (including the expectations and requirements of Employees holding senior or managerial positions within the Company).

#### **6.4 Consequences of breaching the law**

In the event of an actual or suspected breach of law by an Employee during or outside working hours, Telix reserves the right to take disciplinary action as it considers appropriate in the circumstances, which may include counselling, dismissal or termination of the contract or engagement.

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

### **7 Promoting and publishing the Code**

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It is the responsibility of all Employees to read, understand and be familiar with the Code, including any updates which may be made to the Code from time to time.

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.

### **8 Who to speak to if you have questions**

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The Code of Conduct does not expressly set out 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) your actions must be governed by the highest standards of integrity and fairness;
- (b) your decisions must be made in accordance with the spirit and letter of the applicable law; and
- (c) your 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 your Manager or the Company Secretary.