



## **Code of Conduct**

### **Telix Pharmaceuticals Limited**

Adopted by the Board  
effective on 13 November 2024\*

## 1 Purpose

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Telix Pharmaceuticals Limited (**Telix**) and its worldwide affiliates or related bodies corporate (**Group**) are committed to conducting business in an open and accountable way. We believe that how we conduct our business is as important as our results. We seek to instill and maintain a corporate culture and governance practices that are rigorous and meet high ethical standards. We also seek to empower our people to conduct business in a way that is sustainable, responsible and respects the rights and dignity of all people.

Our corporate purpose, mission and values reflect our patient centric focus, the innovative approach we apply across our business and our ongoing commitment to quality, integrity and achievement. Telix's Code of Conduct (GPOL-0013) (**Code**) is our commitment to doing what's right for our people, our partners, our patients, our shareholders and our communities. Our Code sets standards for the way we work at Telix, and for the standards to expect when dealing with Telix.

This Code forms part of the Group's Enterprise Risk Management Framework.

## 2 Our values

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Telix's mission is deliver on the promise of precision medicine through targeted radiation. At our core, we exist to create products that seek to improve the quality of life for people living with cancer and rare diseases. We are united by a common purpose and commitment to our values. Our values underpin our behaviour, intent and impact.

<b>Everyone counts</b>	We put patients and our people first. We respect and value diversity and individuality. We foster a culture of collaboration, where all voices are heard.
<b>We strive to be extraordinary</b>	We explore the possibilities and celebrate learning and success. We are courageous and embrace challenge. We use our talents and knowledge to create a better future.
<b>We act with determination and integrity</b>	We take responsibility for our words, our actions and our results. A commitment to quality and safety underpins everything we do. We strive for excellence in every action, every day.

## 3 Application of the Code

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This Policy applies worldwide to all operating companies of Telix, its directors, officers, executive and senior management, and other employees (**Employees**) as well as Telix's consultants, contractors or advisors, acting on behalf of Telix or the Group (**Partners**).

It is mandatory for all Employees and Partners to understand and comply with the Code.

In applying the Code, Employees and Partners 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, your regional People and Culture representative, any member of the Group Executive Team or the Global Leadership Forum your usual Legal contact or the Group Company Secretary.

## 4 Speak up culture

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Telix believes that when people speak up it can create benefits for everyone including a more diverse and inclusive environment, improved psychological safety, more innovation, better decision making and continuously improved governance, safety and compliance practices.

We aim to promote a safe space and a speak-up culture to ensure that Employees or Partners feel comfortable sharing ideas and/or raising concerns without fear of negative consequences.

We encourage Employees or Partners to actively contribute to a speak-up culture. We support and enable our teams to promptly report actual or potential breaches of the Code, our values or applicable laws through one of multiple channels.

We protect and enhance our speak-up culture by providing internal and external reporting services, including anonymous reporting services. Our Whistleblower Protection Policy and Whistleblower Protection Procedure is in place to ensure whistleblowers are supported and protected from retaliation.

## **5 Applicable Conduct**

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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 work with Telix, for example client and company events such as a training, meetings, entertainment and formal or informal work-related social gatherings.

The expectations and requirements outlined in the Code apply to the way Employees or Partners 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.

## **6 Your obligations**

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### **6.1 Overarching principles of the Code**

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

- (a) act in a way guided by Telix's values, including acting in the best interests of Telix and with transparency, honesty and integrity;
- (b) comply with the laws and regulations which apply to Telix and its operations;
- (c) comply with this Code and Telix policies and procedures;
- (d) disclose material relationships you may have with Employees or Partners, collaborators, business partners, customers and/or suppliers;
- (e) deal honestly, ethically and fairly with Telix's suppliers, customers, competitors and employees;
- (f) take reasonable steps to avoid any conflict of interest, actual or potential, in connection with your employment;
- (g) not knowingly participate in any illegal or unethical activity;
- (h) not enter into any arrangement or participate in any activity that would conflict with the interests of Telix;
- (i) conduct yourself in a manner, both within and outside working hours and including at formal or informal work-related social events, which would not be likely to negatively impact the integrity or reputation of Telix;
- (j) not take advantage of Telix's property or information or your position (or opportunities arising from these) for personal gain;
- (k) not take advantage of or misuse a third party's property or information; and
- (l) 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 Telix.

## 6.2 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 Telix's reputation, and at all times acting in accordance with Telix values.

## 6.3 Conflicts of interest

A conflict of interest occurs when a person's personal interest(s) conflict with their responsibility to act in the best interests of Telix. Personal interests include direct interests as well as those of family, friends, or other organisation that 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 your usual Legal contact.

## 6.4 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 relevant Telix policies and procedures.

Notwithstanding the provisions above, nothing in this Code or any other agreement or Company policy prohibits or restricts you from (i) communicating with government agencies without notice to or approval from the Company, including but not limited to the Securities and Exchange Commission (each, a **Government Entity**) about possible or actual violations of the law, or otherwise providing information to a Government Entity, filing a charge or complaint with a Government Entity, or participating, testifying, or otherwise assisting in Government Entity investigations or proceedings without notice to or approval from the Company, or (ii) making disclosures or communications to engage in protected, concerted activity or otherwise exercising rights under Section 7 of the U.S. National Labor Relations Act. Additionally, nothing in this Code or any other agreement or Company policy limits an employee's, officer's, or director's right to receive an award from any Government Entity for or in connection with information provided to the Government Entity.

## 6.5 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.

## 6.6 Preventing bullying, harassment, sexual harassment and discrimination

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

Any form of discrimination, bullying, harassment, or sexual harassment whether it be physical or psychological will not be tolerated by Telix. All events of this nature will be managed under the Bullying, Harassment and Discrimination and related disciplinary policies. Instances of serious misconduct may result in dismissal.

#### **6.7 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 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 Telix that are over and above that required for the normal conduct or 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 Telix in all the jurisdictions where Telix operates. Telix 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 Anti-Corruption Policy which sets out Telix's anti-bribery and anti-corruption rules to ensure Telix's compliance with the local anti-bribery and anti-corruption legislation and regulations.

#### **6.8 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 and Partners are required to declare the relationship.

Telix provides multiple avenues for disclosure of consensual personal relationships. Declarations can be made to your Manager, People and Culture or to your usual Legal contact. The SVP Global People and Culture 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 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 or Partners if not managed appropriately. Employees or Partners 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.

#### **6.9 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 Telix'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. Telix is committed to protecting all revenue, expenditure and assets from any attempt to gain illegal financial or other benefits.

#### **6.10 Concerns regarding accounting or auditing matters**

Employees with concerns regarding questionable accounting or auditing matters or complaints regarding accounting, internal accounting controls or auditing matters may confidentially, and anonymously if they

wish, submit such concerns or complaints in accordance with the procedures outlined in Telix's Whistleblower Protection Policy.

#### **6.11 Dealings with External Auditor**

Employees, officers and directors must deal with Telix's External Auditor honestly and openly (including not making any misleading statements or omitting any material facts) in relation to any audit, review or examination of Telix's financial statements or the preparation or filing of any document or report. Employees, officers and directors must not do anything that would threaten the independence of the External Auditor's audit or review of Telix's financial statements.

#### **6.12 Additional expectations for leaders**

Telix expects leaders to lead by example. If you set the direction or lead the work of others, Telix expects you to:

- (a) do what is right and ensure ethical considerations are included in business planning and decision making;
- (b) be inclusive and unlock the full power of the diversity and collaboration across the team;
- (c) empower your teams to make sustainable and responsible decisions;
- (d) listen to and resolve concerns within your team;
- (e) foster psychological safety and create an environment to enable teams to speak up and be heard;
- (f) role model the building of constructive relationships and practices across the group and proactively resolve conflicts when they arise, including with other functions;
- (g) 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;
- (h) set clear expectations for your team on the outcomes and behaviour for which they are accountable and provide support, recognition, training and clarity on consequences;
- (i) exercise best judgement, make timely decisions and be accountable for your team's work. Detecting, escalating and remediating issues are your responsibilities; and
- (j) 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 Enterprise Risk Management Framework.

#### **6.13 Other policies regulating behaviour**

You are required to comply with all Telix governance and employment-related policies located in the Telix Policy Document Library and as amended from time to time, including but not limited to:

- (a) Health, Safety, Wellbeing and Environment Policy (BPOL-0002);
- (b) Privacy Policy (BPOL-0006);
- (c) Grievance Policy (BPOL-0007);
- (d) Disciplinary Policy (BPOL-0008);
- (e) Bullying, Harassment and Discrimination Policy (BPOL-0009);
- (f) Anti-Bribery and Anti-Corruption Policy (GPOL-0012);

- (g) Competition Policy (GPOL-0015);
- (h) Modern Slavery Policy (GPOL-0020); and
- (i) Securities Dealing Policy (GPOL-0028).

## 7 Breaches or suspected breaches of the Code

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At Telix, we hold ourselves to high standards and take all reasonable steps to ensure we do what is right in compliance with our Code, values and applicable laws. We acknowledge there is always the possibility of misconduct by individual and so we have measures in place to ensure any suspected instances of misconduct are investigated thoroughly. Where misconduct is found, we take swift and appropriate action.

### 7.1 Avenues available to raise concerns

Employees can raise concerns about any actual or suspected breach of this Code through any of these contact points:

- (a) through any member of the Legal team including the Group General Counsel or the Group Company Secretary;
- (b) through any member of the Governance, Risk and Compliance Team including the SVP Global Governance, Risk and Compliance;
- (c) confidentially and anonymously via 'Your Voice' in the Group's HR Information System, 'BOB'; and
- (d) in accordance with the Telix Whistleblower Protection Policy which is available in the Policy Document Library on SharePoint (in English, French and Japanese) and on the Telix website [www.telixpharma.com](http://www.telixpharma.com).

External partners can raise concerns about any actual or suspected breach of this Code through any of these contact points:

- (a) directly with their relationship point of contact;
- (b) via independent third-party Lighthouse-Syntrio at [www.lighthouse-services.com/Telixpharma](http://www.lighthouse-services.com/Telixpharma); and
- (c) in accordance with the Telix Whistleblower Protection Policy which is available on the Telix website [www.telixpharma.com](http://www.telixpharma.com).

### 7.2 Investigations

Telix may, in its absolute discretion, investigate suspected contraventions of the Code as it considers appropriate in the circumstances and in line with other relevant policies. The investigation will be conducted in accordance with Telix's investigations procedure and may be conducted in consultation with relevant stakeholders such as People and Culture, Legal, and the manager of the person alleged to be in breach of the Code.

Telix may report contraventions of the Code to the Board of Directors.

### 7.3 Consequences of breaching the Code

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

A breach of the Code by Employees may result in disciplinary action, including counselling, formal warnings or termination of employment or engagement. Telix may take any action it considers appropriate in the circumstances in line with relevant policies and may have regard to any matter in its absolute discretion, including the nature and seriousness of the breach and Employee's position (including the expectations and requirements of those holding senior or managerial positions within Telix).

#### **7.4 Consequences of breaching the law**

In the event of an actual or suspected breach of law 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.

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

### **8 Waivers of this Code of Conduct**

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In rare circumstances, an exemption from a provision in this Code of Conduct may be granted. If you believe that a waiver of a provision of this Code of Conduct is appropriate for your circumstances, you should contact your regional People and Culture representative, your usual Legal contact or the Group Company Secretary. A record of all requests for waivers will be maintained by Telix. Any waiver granted to an executive officer or director of Telix must be granted by the Board of Directors, or a committee of the Board of Directors, and may require public disclosure under SEC and Nasdaq requirements.

### **9 Status of this document**

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The Code does not form part of the terms and conditions of employment for any Telix employee and is not contractual in nature. However to the extent that the Code requires Employees or Partners to do or refrain from doing something, it constitutes a direction from Telix and/or the Group with which Employees and Partners must comply. Telix may amend, apply, not apply, suspend or replace this document at its discretion.

### **10 Promoting and publishing the Code**

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

Telix 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.

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

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The Code does not expressly set out every ethical issue that Employees and Partners might face, nor every law and policy that applies to Telix. In representing Telix you are expected to act in a manner consistent with the key values underpinning the Code, 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 and Partners, shareholders and Telix alike.

If you have any questions regarding this Code or any of Telix's policies, you should contact your Manager, your regional People and Culture representative, any member of the Group Executive team, the Global Leadership Forum, your usual Legal contact or the Group Company Secretary.

### **12 Review**

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The Board will review and update this Policy as required but at a minimum at least annually.