

Whistleblower Protection Policy

Telix Pharmaceuticals Limited

Adopted by the Board effective on 13 November 2024*

Telix Pharmaceuticals Limited Whistleblower Protection Policy – Summary Guide

Telix is committed to conducting business with honesty and integrity. As part of this commitment, Telix will honour its obligation to protect any genuine whistleblowers who come forward from retaliation.

Telix's Board of Directors is ultimately responsible for ensuring that Telix has an appropriate Enterprise Risk Management Framework (**ERMF**) to identify and manage risk on an ongoing basis. This Whistleblower Protection Policy (**Policy**) forms part of Telix's ERMF and corporate governance. It is one of the mechanisms in Telix's risk management toolkit for identifying wrongdoing.

The purpose of this Policy is to help employees and other relevant parties to feel confident about raising concerns at Telix about misconduct by offering reporting and investigative processes that enable you to make disclosures confidentially (anonymously if you so choose) and have them dealt with in an objective, confidential and independent manner that protects you from reprisal or disadvantage.

Having a whistleblower protection policy in place and accessible to all employees and to third party vendor partners in multiple formats and languages, helps us to live our Telix values.

The Policy is designed to:

- (a) encourage people to speak-up if they become aware of potential wrongdoing;
- (b) provide transparency around Telix's framework for receiving, handling and investigating disclosures;
- (c) explain how to speak-up and what protections are available to Eligible Whistleblowers; and
- (d) promote a workplace environment in which everyone feels safe, supported and encouraged to speak-up.

All employees, officers, contractors, and associates of the Company have a responsibility to help detect, prevent and report instances of wrongdoing. The Company encourages employees and non-employees to speak-up and raise concerns about wrongdoing without fear of retaliatory action.

Speaking up

Anyone with information about a potential misconduct is encouraged to report that information to an Eligible Recipient (i.e. to speak up) or through an appropriate channel. The Eligible Recipients are set out in section 2 of this Policy.

If you are an eligible whistleblower and you report potential misconduct to an Eligible Recipient, you may qualify for legal protections. Further information is in sections 5 and 6 of this Policy.

Quick guide to this Policy

A quick guide to this Policy is included in Attachment 1 to assist potential whistleblowers in understanding whether they are eligible for the protections mentioned in this Policy, and, if they are eligible, what those protections entail.

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1 Purpose of this Policy

1.1 Background

Telix Pharmaceuticals Limited (**Telix**) is committed to a high level of integrity and ethical standards in all business practices. Employees must conduct themselves in a manner consistent with current community, ethical and Company standards and in compliance with all applicable laws and regulations.

This Policy is intended to encourage the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Telix and its worldwide affiliates or related bodies corporate (together the **Group**) and details protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

1.2 Interaction with whistleblower laws

In many countries, there are laws in place which impose specific obligations and protections in relation to whistleblowers and recipients of whistleblowing reports. For example, the *Corporations Act 2001* (Cth) in Australia; the Whistleblower Protection Act of 1989 in the United States; and EU Directive 2019/1937 on the protection of whistleblowers in the EU.

This Policy is not intended to override any rights or obligations you or Telix may have under applicable laws and regulations. This Policy must be read in conjunction with and subject to the laws and regulations in the local jurisdiction.

1.3 Interaction with Telix's existing Code of Conduct

Telix's Code of Conduct sets out its policy on whistleblowing and its commitment to protect whistleblowers. This Policy describes how that commitment is implemented.

2 Speaking up

Telix encourages any person with information about potential misconduct to speak up about such misconduct.

This Policy applies to an individual who is (or has been):

- (a) an officer, employee, volunteer, contractor or associate of the Group;
- (b) a supplier of goods or services (whether paid or unpaid) to the Group, including an individual who is or has been employed by such a supplier;
- (c) a relative, spouse or dependant of any of the above.

The above persons are **Eligible Whistleblowers** and may also be protected by whistleblowing laws. Please see Attachment 2 for more information about protections under Australian law.

3 Disclosures covered by this Policy

3.1 Disclosable Matters

A **Disclosable Matter** is information that an Eligible Whistleblower has reasonable grounds to suspect concerns misconduct (e.g. fraud, negligence, default, breach of compliance policy, breach of trust and breach of duty), or an improper state of affairs or circumstances, in relation to the Group.

Without limiting what may be a Disclosable Matter, examples of possible Disclosable Matters include conduct by the Group or any of its officers or employees which:

(a) constitutes an offence against, or a contravention of any Prescribed Law;

- constitutes an offence against any other law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more;
- (c) represents a danger to the public or the financial system;
- (d) is conduct that may cause financial loss to the Group or is otherwise detrimental to the interests of the Group;
- (e) constitutes a questionable accounting or auditing matter or practice, or raises concerns regarding Telix's accounting, internal controls or auditing matters;
- is illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property;
- (g) is a wilful and/or material breach of the compliance guides and/or policies of the Group;
- (h) is fraud, money laundering and/or misappropriation of funds;
- (i) is offering or accepting a bribe; and/or
- (j) is engaging in or threatening to engage in detrimental conduct against a person who has made a Disclosure.

While a Disclosable Matter may involve conduct which is unlawful, this is not essential. Dishonest or unethical behaviour and practices, conduct that may cause harm, or conduct prohibited by Telix's policies can be a Disclosable Matter.

If you are an Eligible Whistleblower and you report a Disclosable Matter to an Eligible Recipient, you may qualify for legal protections. Further information is available in Attachment 2.

You should make a Disclosure even if you are unsure if something is a Disclosable Matter. An Eligible Whistleblower may still qualify for protection even if their disclosure turns out to be incorrect provided that they had "reasonable grounds to suspect" the disclosure was correct.

3.2 Personal work-related grievances

Disclosures that relate to personal work-related grievances are generally not Disclosable Matters.

Personal work-related grievances are those that relate to the discloser's current or former employment or engagement that have, or tend to have, implications for the discloser personally.

Examples of personal work-related grievances include disclosures regarding interpersonal conflicts with other employees, transfer and promotion decisions, decisions regarding the terms and conditions of employment, decisions regarding suspension and termination of employment and disciplinary decisions. Generally, these grievances should be raised by employees speaking to your People and Culture (P&C) contact to allow those issues to be resolved most effectively.

While personal work-related grievances will not generally amount to a Disclosable Matters, there may be instances where personal work-related grievances would be covered by this Policy and, in some cases, personal work-related grievances may qualify for legal protection. Further information is available in Attachment 2.

3.3 False reports

It is important to note that the submission of a false report could have significant effects on the Group's reputation and the reputations of its directors, officers and employees and could also cause considerable waste of resources. Any deliberately false report may be a breach of the Code of Conduct and will be treated as a serious disciplinary matter.

3.4 Government agencies in the United States

Nothing in this Policy or any other agreement or Company policy prohibits or restricts you from communicating with government agencies in the United States, including the U.S. Securities and Exchange Commission, without notice to or approval from the Company about possible or actual violations of the law, or otherwise providing information to a government agency, filing a charge or complaint with a government agency, or participating, testifying, or otherwise assisting in government agency investigations or proceedings without notice to or approval from the Company.

4 How to make a Disclosure

4.1 Disclosure to Eligible Recipients

The disclosure of a Disclosable Matter (a **Disclosure**) can be made directly to any of the following **Eligible Recipients**:

- (a) Group General Counsel;
- (b) Group Company Secretary:
- (c) SVP Global People and Culture.

For Group employees, the contact details of the Eligible Recipients can be found on the Telix human resource information system (BOB). Individuals may make a disclosure to any of the above Eligible Recipients at any time by using any method you prefer (including by email, letter, telephone or in person). Telix has however nominated the Group Company Secretary to act as Telix's Whistleblower Protection Officer.

Disclosures may also be made by post to c/- Telix Pharmaceuticals Limited, 55 Flemington Road, North Melbourne, Victoria 3051 Australia (marked to the attention of one of the Eligible Recipients referred to above).

Individuals may also make a Disclosure:

- to our external auditors, PricewaterhouseCoopers (PwC), by accessing the PwC Ethics Helpline - pwc.com/ethicshelpline - where details of how to report by phone or online can be found.
- via an independent third party, Lighthouse-Syntrio, through www.lighthouse-services.com/Telixpharma where details of how to report by phone or online can be found

While a Disclosure can be made verbally, to enable the efficient investigation of the Disclosable Matter, Telix encourages a Disclosure to be made in writing and with as much detail as possible along with any supporting evidence (emails, texts, documents etc.).

While we encourage you to make a Disclosure to one of the Eligible Recipients listed above, there are certain other people to whom you can report and still receive the legal protections described in section 5 below, who are listed in Attachment 2.

4.2 Remaining anonymous

A Disclosure can be made anonymously if preferred and permitted in the relevant jurisdiction.

While Telix will not investigate the identity of an Eligible Whistleblower who wishes to remain anonymous, it is that Eligible Whistleblower's obligation to manage their anonymity in making a Disclosure anonymously, including by expressly stating that their disclosure is being made on an anonymous basis. Neither Telix, its officers or employees, nor the Whistleblower Protection Officer shall be liable if the Eligible Whistleblower's identity is, or becomes, readily ascertainable as a result of the Eligible Whistleblower's failure to manage their anonymity.

If an Eligible Whistleblower chooses to make a Disclosure anonymously, this may hinder the ability of Telix to fully investigate the matter. Accordingly, Telix encourages Eligible Whistleblowers to provide contact details to assist in any investigation into the matter. An Eligible Whistleblower who wishes to remain anonymous should maintain ongoing two-way

communication with the recipient of the Disclosure, so Telix can ask follow-up questions and provide updates on investigations.

5 Legal protections available to Eligible Whistleblowers

Telix is committed to protecting Eligible Whistleblowers who make Disclosures under this Policy. This section outlines the Group's policy on protecting those who make Disclosures. Australian law also contains protections for disclosers, which are summarised in Attachment 2.

5.1 Protection of identity

Telix will keep confidential and protect the Eligible Whistleblower's identity as appropriate and consistent with applicable law. A discloser's identity (and information which would allow their identity to be ascertained) will only be disclosed if the individual gives their consent to disclose that information or in exceptional circumstances where disclosure is allowed or required by law. If a Disclosure qualifies for legal protection as set out in Attachment 2, the Eligible Whistleblower's identity and information that is likely to lead to another person identifying the discloser has the benefit of these protections at law. If a person makes an unauthorised disclosure of an Eligible Whistleblower's identity, the person may breach the law and the discloser may be able to seek legal recourse. In some circumstances, this may also be a criminal offence.

5.2 Protection from detrimental conduct and retaliation

No person may be subjected to detrimental conduct or threats of detrimental conduct where the conduct/threat is motivated by the belief or suspicion that the person or another person made or will make a Disclosure (contravention of this provision may lead to severe penalties).

In this context, detrimental conduct includes the dismissal of an employee, injury of an employee in his or her employment, alteration of an employee's position or duties to his or her disadvantage, discrimination between an employee and other employees of Telix, harassment or intimidation of a person, harm or injury to a person, including psychological harm, damage to a person's property, damage to a person's reputation, damage to a person's business or financial position or any other damage to a person.

If a Disclosure qualifies for legal protection as set out in Attachment 2, the Eligible Whistleblower is legally protected from detriment. If a person causes detriment or victimises, or threatens to do so, the person may breach the law and the Eligible Whistleblower may be able to seek legal recourse. In some circumstances, this may also be a criminal offence.

You should tell an Eligible Recipient listed in section 4.1 if you or someone else is being, or has been, subject to detrimental conduct in connection with speaking up. Telix will treat this very seriously. Any person involved in detrimental conduct will be subject to disciplinary action. In some circumstances, this may also be a criminal offence punishable by imprisonment.

5.3 Other legal protections

Telix is committed to making sure that Eligible Whistleblowers are treated fairly and do not suffer retaliation or detriment because they speak up. The protections offered will depend on variables such as the Disclosable Matter and people involved.

Telix will look for ways to support all people who make a Disclosure that are practicable and consistent with applicable law.

Further information regarding the specific protections afforded under Australian law to persons who make a Disclosure whose matter is subject to such Australian law is available in Attachment 2.

6 Handling and investigation of Disclosures

6.1 Investigations generally

The recipient of a Disclosure will, as soon as practicable, provide the Eligible Whistleblower's report to the most appropriate person to conduct an initial review. Depending on the

circumstances, the person may be someone within Telix (including the recipient). However, where it is not appropriate for the initial review to be conducted by the recipient or someone within Telix, the recipient may take steps to identify and engage an appropriate external party (such as an independent legal adviser) to conduct the initial review. A Disclosure may be addressed and resolved through formal investigation or through a non-investigative process, such as assisting employees through coaching, mentoring and monitoring.

For the avoidance of doubt, the recipient of a Disclosure must not disclose to the person the identity of the Eligible Whistleblower or information which would allow their identity to be ascertained except where this is allowed by the applicable law or with consent (i.e. in the circumstances set out in section 5.1 above).

The person conducting the initial review will make inquiries and may seek input from members of the senior executive team (except to the extent a member is the subject of the report).

The objectives of the initial investigation include:

- collecting information, considering that information and concluding whether or not there are reasonable grounds to indicate a Disclosable Matter; and
- (b) where appropriate, making recommendations on appropriate remedial actions or further investigation that should take place (including potential investigations by an external party such as an independent legal adviser or referrals to regulatory bodies) in respect of a Disclosable Matter.

The exact process and timeframe for each initial investigation and any subsequent investigation will vary depending on the nature of the process. Any subsequent investigation should be completed as soon as reasonably practicable.

All investigations will be conducted as far as practicable on a confidential basis and in an appropriate manner having regard to the nature of the Disclosable Matter and the surrounding circumstances. The findings of investigations will be documented internally and reported as appropriate to those responsible for the oversight of this policy (subject to any restrictions appropriate or necessary including in relation to Telix's obligations to maintain confidentiality of the identity of the Eligible Whistleblower as described in section 5.1 above). The nature of the documentation and reporting will depend on the nature of the Disclosure. Confidentiality will be observed in relation to handling and storing records.

Any investigation will be independent of the Eligible Whistleblower and any person(s) subject to an allegation in respect of a Disclosable Matter.

The act of whistleblowing does not protect Eligible Whistleblowers from the consequences of any involvement in the improper conduct disclosed in the report (including civil and criminal liability that would flow from that conduct). Involvement in improper conduct may also lead to disciplinary action, including termination of employment. However, the admissions made by an Eligible Whistleblower may be a mitigating factor when considering disciplinary action.

If a report of a Disclosable Matter subsequently leads to regulatory or Court proceedings, the Eligible Whistleblower who made a report under this policy may be requested by Telix to provide assistance, including as a witness.

6.2 Fair treatment of persons named in a Disclosure

Telix will ensure the fair treatment of any person named in or the subject of a Disclosure including by, as much as is practical and appropriate in the circumstances, keeping their name confidential to the investigation and requiring all other matters discussed as part of the investigation remain confidential.

Any person who becomes subject to an allegation in respect of a Disclosure will (to the extent permitted by law) be provided an opportunity to understand and respond to the allegations as part of any investigation.

Generally, no adverse action will be taken against a person named in relation to a Disclosure unless warranted at the end of the investigation (save for where action is warranted in advance of the conclusion of the investigation).

A person named in relation to a Disclosure will, as appropriate and to the extent permitted by law, be kept informed of the progress and outcomes of the investigation (subject to any privacy and confidentiality obligations and as required by law) including any proposed remedial actions.

7 Support for Eligible Whistleblowers

Telix believes that those who reasonably suspect or witness misconduct should be able to report their suspicions with the confidence that they will be supported, and not punished or discriminated against for making a disclosure.

Eligible Whistleblowers are encouraged to raise any concerns arising out of a disclosure (or anticipated disclosure) of a Disclosable Matter or any subsequent investigation process via the methods set out in section 4.1 above. Telix will take appropriate action to ensure that any detriment is averted as far as possible and otherwise addressed appropriately. Additional support services may be requested if they are required.

Where appropriate, a senior officer or employee will be assigned to support the Eligible Whistleblower (Whistleblower Support Officer) and to act as liaison between the Eligible Whistleblower and any investigation team.

The investigators or the Whistleblower Support Officer will, as appropriate, keep the Whistleblower informed of the progress and outcomes of the investigation (subject to any privacy and confidentiality obligations and as required by law) including any proposed remedial actions.

7.1 Access to Employee Assistance Program

Telix offers support to its employees and their families through the Employee Assistance Program (EAP) by independent provider TELUS Health. The EAP is a confidential wellbeing, coaching and counselling service available to assist Telix employees who are experiencing challenges that may adversely affect them at work or at home. The program is available at no cost to all employees and their immediate family members. Employees can contact TELUS Health directly without consulting Telix via telephone or via their application. Tollfree numbers for each country in which Telix has employees are provided to all Employees and are available on the Telix intranet site.

Consultations are available face to face, over the telephone, via video, or online, and counselling discussions are informal, friendly, and focused on employee needs.

8 General

8.1 Availability of this Policy and relationship to other policies

All officers and employees of Telix will be provided with access to this Policy including via a copy posted on Telix's website. All officers and employees are provided with training in this policy on a periodic basis.

This Policy should be read in conjunction with other Telix policies including the Code of Conduct, Bullying, Harassment and Discrimination Policy and Anti-Bribery and Anti-Corruption Policy.

While this Policy will be implemented across the Group, the principles of this Policy must be read in conjunction with and subject to the laws and regulations in the local jurisdiction in which each Telix Group company operates.

8.2 Languages

This Policy will be translated and made available in the primary language/s of the lead jurisdictions in which Telix operates (specifically English, French and Japanese).

8.3 Monitoring, reviews and updates

The Board will, at least quarterly, receive a summary of all reports made under this Policy together with additional information about any material incidents raised. Individual reports may be escalated to the Board at any time as appropriate.

The Board, with assistance from the Audit and Risk Committee with respect to the receipt, retention and treatment of complaints regarding accounting, internal controls, or auditing matters, will review and update this Policy as required but at a minimum on an annual basis.

8.4 Status of this Policy

This Policy is not a term of any contract, including any contract of employment, and does not impose any contractual duties, implied or otherwise, on Telix or the Group. This Policy may be varied by Telix from time to time.

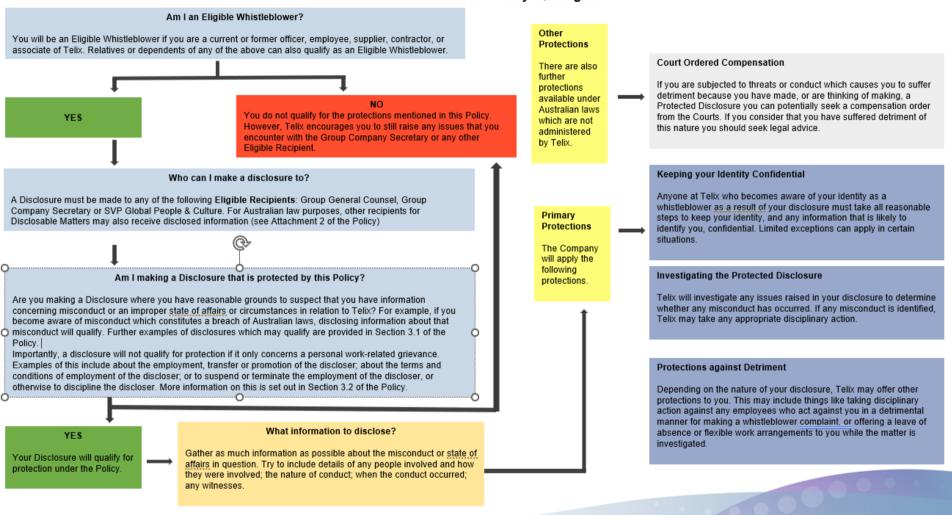
Glossary

For the purpose of this Policy:

Defined term	Meaning		
AFP	the Australian Federal Police.		
APRA	the Australian Prudential Regulation Authority.		
ASIC	the Australian Securities and Investments Commission.		
Corporations Act	the Corporations Act 2001 (Cth).		
Prescribed Law	(a) the Corporations Act 2001 (Cth);		
	(b) the Australian Securities and Investments Commission Act 2001 (Cth);		
	(c) the Banking Act 1959 (Cth);		
	(d) the Financial Sector (Collection of Data) Act 2001 (Cth);		
	(e) the Insurance Act 1973 (Cth);		
	(f) the Life Insurance Act 1995 (Cth);		
	(g) the National Consumer Credit Protection Act 2009 (Cth);		
	(h) the Superannuation Industry (Supervision) Act 1993 (Cth);		
	(i) the US Securities Exchange Act of 1934, as amended;		
	(j) the Sarbanes-Oxley Act of 2002; and		
	(k) any instrument made under any of the above laws.		
Taxation Administration Act	the Taxation Administration Act 1953 (Cth).		

Attachment 1 - Quick Guide

Whistleblower Protection Policy: Quick guide



Attachment 2 - Protections provided by Australian law

1. Additional legislative protections

Under Australian law, including the *Corporations Act 2001* (Cth) (the **Act**), legislative protections for Disclosures are available to certain persons including current and former employees, volunteers, officers, contractors, suppliers, employees of suppliers, associates, as well as these people's relatives and dependants (**Eligible Whistleblowers**) who make a protected disclosure to certain people.

Individuals are encouraged to make a Disclosure under this Policy. However, the law offers protections in other cases (for example, you can report Disclosable Matters to people other than Eligible Recipients). If you make a protected disclosure under the law that does not comply with the Whistleblower Protection Policy, you will still be entitled to the legal protections. A disclosure can qualify for protection under the Act even if it is made anonymously or turns out to be incorrect.

Please contact the Group General Counsel if you would like more information about legal protections.

2. Protected Disclosures

To be a protected disclosure qualifying for protection under the Act, the Disclosure must relate to a Disclosable Matter and be made to an Eligible Recipient under the Act. A matter that is disclosed under the Policy but which does not meet these criteria will not qualify for protection under the Act. Examples of this information and recipients are outlined in the following table.

Information reported or disclosed	Recipient of disclosed information
General Disclosable Matters	Recipients for any general Disclosable Matters
Information about actual or suspected misconduct, or an improper state of affairs or circumstances in relation to the Group	A person authorised by Telix to receive Protected Disclosures – i.e., Eligible Recipients under this Policy (see section 4.1)
Information that the Group, or any officer or employee of Telix, has engaged in conduct that:	An officer or senior manager of the Group
 contravenes or constitutes an offence against applicable laws (e.g., the Act); 	An auditor, or a member of an audit team conducting an audit, of the Group
or	An actuary of the Group
 represents a danger to the public or the financial system; or 	ASIC, APRA, or another Commonwealth body prescribed by regulation
 constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. 	A legal practitioner for the purposes of obtaining legal advice or legal representation (even if the legal practitioner concludes the disclosure does not relate to a Disclosable Matter)
Note that personal work-related grievances are not Protected Disclosures under the law, except as noted below.	Journalists or parliamentarians, under certain circumstances allowing emergency and public interest disclosures. It is important for you to understand the criteria for making a public interest or emergency disclosure before doing so. Please contact the Group General Counsel if you would like more information about emergency and public interest disclosures

<u> </u>					
Information about misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of Telix or an associate, which the person considers may assist the recipient to perform functions or duties in relation to the tax affairs of Telix or an associate	Recipients for any tax-related Disclosable Matters A person authorised by Telix to receive reports of tax-related Disclosable Matters An auditor, or a member of an audit team conducting an audit, of Telix A registered tax agent or BAS agent who provides tax services or BAS services to Telix A director, secretary, or senior manager of Telix An employee or officer of Telix who has functions or duties that relate to the tax affairs of Telix A legal practitioner for the purpose of obtaining legal advice or legal representation				
Information that may assist the Commissioner of Taxation to perform their functions or duties under a taxation law in relation to Telix or an associate	Recipients for any further tax-related information Commissioner of Taxation A legal practitioner for the purpose of obtaining legal advice or legal representation				

3. Personal work-related grievances

Legal protection for disclosures about solely personal employment related matters are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if, in summary:

- it concerns detriment to you because you have or may be considering making a Disclosure; or
- it is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the law about whistleblowers.

Under the law, a grievance is not a 'personal work-related grievance' if it:

- has significant implications for an entity regulated under the law that do not relate to the discloser;
- concerns conduct, or alleged conduct, in contravention of specified corporate and financial services laws, or that constitutes an offence punishable by 12 months or more imprisonment under any other Australian Commonwealth laws; or
- · concerns conduct or alleged conduct that represents a danger to the public or financial system; or
- concerns conduct or alleged conduct prescribed by the regulations.

4. Specific protections and remedies

Additional legislative protections may also be available, including but not limited to:

- compensation for loss, damage or injury suffered as a result of detrimental conduct;
- an injunction to prevent, stop or remedy the effects of the detrimental conduct;
- an order requiring an apology for engaging in the detrimental conduct;
- if the detrimental conduct wholly or partly resulted in the termination of an employee's employment, reinstatement of their position;
- · exemplary damages; and
- any other order the court thinks appropriate.

You are also protected from the following in relation to a Protected Disclosure you make:

- civil liability (e.g., any legal action against you for breach of an employment contract, duty of confidentiality or another contractual obligation);
- criminal liability (e.g., attempted prosecution of you for unlawfully releasing information, or other use of the disclosure against you in a prosecution (other than for making a false disclosure)); and
- administrative liability (e.g., disciplinary action for making the disclosure).

However, you will not have immunity for any misconduct you have engaged in that is revealed in a disclosure.