



## **Continuous Disclosure Policy**

### **Telix Pharmaceuticals Limited**

Adopted by the Board  
effective on 13 November 2024\*

## 1 General disclosure policy and obligations

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### 1.1 Purpose of this Policy

Telix Pharmaceuticals Limited (**Telix**) has significant obligations under applicable laws and regulations, including under the *Corporations Act 2001* (Cth) (**Corporations Act**), the United States federal securities laws (**U.S. Securities Laws**), and the listing rules of ASX Limited (**ASX**), the Nasdaq Stock Market (**Nasdaq**), and Singapore Exchange (**SGX**) (collectively, the **Listing Rules**), to keep the market fully informed of information which may have a material effect on the price or value of Telix's securities.

This Continuous Disclosure Policy (**Policy**) sets out the Board's continuous disclosure policies and practices, having regard to applicable laws and regulations, including the Listing Rules and associated guidance notes.

### 1.2 Commitment to disclosure and communication

Telix is committed to the objective of promoting investor confidence and the rights of investors by:

- (a) complying with the continuous disclosure obligations imposed by law and the Listing Rules;
- (b) presenting company announcements in an accurate and balanced way and expressed in a clear and objective manner;
- (c) providing investors with equal and timely access to material information concerning Telix; and
- (d) communicating effectively with investors and enabling them to reasonably participate in general meetings.

### 1.3 Compliance with disclosure requirements

Telix has securities listed on the ASX, SGX and Nasdaq (**Relevant Exchanges**).

Telix will act at all times with integrity and in accordance with applicable laws and regulations, including the Corporations Act, the U.S. Securities Laws, requirements of the United States Securities and Exchange Commission (**SEC**) and the requirements of the Listing Rules.

### 1.4 Policy application and scope

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**).

## 2 Continuous disclosure obligations

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### 2.1 Immediate disclosure of price sensitive information

Telix must, subject to the disclosure exceptions set out in the applicable Listing Rules, immediately notify the market of any information or development related to its business that Telix becomes aware of that a reasonable person would expect to have a material effect on the price or value of its securities. This information is referred to as "**Price Sensitive Information**". Materiality is assessed having regard to all the relevant background information, including past Telix announcements and other generally available information. See Annexure 1 for examples of Price Sensitive Information.

### 2.2 Exceptions to the continuous disclosure rule

Disclosure to the market is not required where each of the following conditions is and remains satisfied:

- (a) one or more of the following apply:
  - (i) it would be a breach of a law to disclose the information;

- (ii) the information concerns an incomplete proposal or negotiation;
  - (iii) the information comprises matters of supposition or is insufficiently definite to warrant disclosure;
  - (iv) the information is generated for the internal management purposes of Telix; or
  - (v) the information is a trade secret; and
- (b) the information is confidential and the Relevant Exchange has not formed the view that the information has ceased to be confidential; and
  - (c) a reasonable investor would not expect the information to be disclosed.

### 2.3 Other disclosure obligations

Telix has numerous other disclosure obligations under the Listing Rules, U.S. Securities Laws and the rules and regulations of the SEC (**SEC Rules**). The Group Company Secretary is responsible for ensuring that necessary disclosures are made as and when required.

## 3 Reporting disclosable events

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### 3.1 Disclosure procedure

- (a) Any Employee or Partner who becomes aware of information which may constitute Price Sensitive Information must immediately inform the Group Company Secretary or Group Chief Financial Officer (**CFO**) of this information for assessment against Telix's continuous disclosure obligations.
- (b) Where information reported under section 3.1(a) is determined Price Sensitive Information, the Disclosure Committee (in accordance with its Charter) will (as appropriate):
  - (i) review the information in question and determine whether it is Price Sensitive Information that is required to be disclosed to a Relevant Exchange;
  - (ii) urgently seek any advice that is needed to assist the Disclosure Committee to interpret the information;
  - (iii) inform the Board, as necessary;
  - (iv) consider whether it is necessary to seek a trading halt; and
  - (v) coordinate the actual form of disclosure with the relevant members of management and Directors and confirm the approval by all required persons of the proposed disclosure.
- (c) All announcements under the Listing Rules must be approved by the Disclosure Committee before the announcement is made or disclosure released through the Group Company Secretary. The exceptions to this rule are market announcements relating to matters reserved for the Board outlined in Telix's Disclosure Committee Charter or administration notices which can be approved by the Group Company Secretary.
- (d) All announcements to Relevant Exchanges will be made in accordance with section 3.1(c).
- (e) The Board and senior management should consider whether any matters reported to or discussed at any Board or management meetings should be disclosed to the market pursuant to Telix's continuous disclosure obligations.
- (f) All announcements of Price Sensitive Information that are disclosed to the ASX should also be promptly disclosed in accordance with the Listing Rules of the SGX and Nasdaq and the SEC Rules.

### **3.2 Inform Relevant Exchange first**

Telix will not release any information publicly (including on an embargo basis) that is required to be disclosed through ASX or other Relevant Exchange until Telix has received formal confirmation of its release to the market, unless otherwise required by the Listing Rules.

## **4 Trading halts and suspension from trading**

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Telix may request a trading halt, or, in exceptional circumstances, a voluntary suspension, to prevent trading in Telix's shares taking place on an uninformed basis, to correct or prevent a false market, or to otherwise manage Telix's disclosure obligations.

The Board is required to approve a trading halt or voluntary suspension. Where the full Board is not immediately available and urgent action is required, the Disclosure Committee (or failing the Disclosure Committee, the Group Company Secretary) is authorised to approve a trading halt or voluntary suspension.

The Group Company Secretary will alert and keep all Directors informed of any request for a trading halt or voluntary suspension.

## **5 Avoiding a false market**

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If a Relevant Exchange considers that there is or is likely to be a false market in Telix's securities it may ask Telix to give it information to correct or prevent a false market. Telix is obliged to give this information even if an exception described in section 2.2 of this Policy applies.

## **6 Disclosure is the Board's responsibility**

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The Board is ultimately responsible for Telix's compliance with its continuous disclosure obligations. Its responsibilities include:

- (a) monitoring Telix's ongoing compliance with its continuous disclosure obligations;
- (b) ensuring Employees are provided with training in respect of this Policy; and
- (c) reviewing and making changes to this Policy as required.

## **7 Role of the Group Company Secretary**

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Telix has nominated the Group Company Secretary as the Disclosure Officer, being the officer with responsibility for the day-to-day management of activities related to Telix's continuous disclosure obligations and with primary responsibility for all communication with Relevant Exchanges in relation to Listing Rule matters. In particular, the Group Company Secretary is responsible for:

- (a) ensuring all Relevant Exchange announcements and SEC filings are approved in accordance with this Policy and Disclosure Committee Charter;
- (b) approving routine announcements that are administrative in nature;
- (c) liaising with Relevant Exchanges in relation to continuous disclosure issues (including trading halts, if required);
- (d) preparing or overseeing the preparation of all announcements to be released on a Relevant Exchange platform and filed or furnished with the SEC;
- (e) lodging announcements with Relevant Exchanges and filing or furnishing announcements with the SEC in relation to continuous disclosure matters;

- (f) distributing continuous disclosure announcements to the Board immediately after they have been released to a Relevant Exchange and filed or furnished with the SEC;
- (g) immediately referring any Price Sensitive information received under section 3.1(a) of the Policy to the Disclosure Committee;
- (h) maintaining a record of discussions and decisions made about disclosure issues by the Disclosure Committee;
- (i) maintaining an accurate record of all announcements sent to a Relevant Exchange and filed or furnished with the SEC and all correspondence with ASIC, the SEC, or other applicable regulatory authorities in relation to Telix's continuous disclosure obligations; and
- (j) ensuring that all announcements sent to a Relevant Exchange and filed or furnished with the SEC are posted promptly on Telix's website.

## **8 Public communications**

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### **8.1 External communications**

Telix must not release any Price Sensitive Information publicly before it is provided to a Relevant Exchange, including in the following contexts:

- (a) one-on-one briefings and speeches made to market participants, the financial community or institutional investors;
- (b) open briefing sessions, including public speeches (presentation materials for which will be disclosed to a Relevant Exchange prior to commencement of the briefing session);
- (c) visits to Telix's sites by members of the financial community; and
- (d) speeches or presentations at, or participation in, conferences or forums by Telix's executives.

Telix will keep records of all external communications. Where, in the process of taking or compiling records of external communications, a representative of Telix believes that Price Sensitive Information may have been disclosed inadvertently, the matter must be immediately reported to the CFO or Group Company Secretary for review by the Disclosure Committee for immediate disclosure to a Relevant Exchange.

### **8.2 Authorised spokespersons**

The only Company representatives authorised to speak on behalf of Telix for the purpose of external communications:

- (a) Chairperson of the Board;
- (b) CEO;
- (c) CFO;
- (d) SVP Investor Relations and Corporate Communications; or
- (e) their delegates nominated for a specific purpose.

### **8.3 Market speculation and rumours**

Telix generally does not respond to market speculation or rumours unless required to do so by law, at the request of a Relevant Exchange, or otherwise pursuant to this Policy. All Employees or Partners must abide by this principle.

Any rumours or market speculation must immediately be reported to the Disclosure Committee so that consideration can be given as to what further action to take (if any).

Employees or Partners who are approached by the media or any external parties for information should observe the 'no comments' policy and notify the SVP Investor Relations and Corporate Communications and/or the Group Company Secretary as soon as possible.

#### **8.4 Interview/briefing black-outs**

To prevent inadvertent disclosure of material information, during the periods between the end of the financial reporting period and the actual release of results, Employees or Partners must not discuss with any external party any financial information or any other information concerning forecasts or financial estimates, unless that information has previously been disclosed to a Relevant Exchange.

#### **8.5 Monitoring media coverage**

Telix will monitor media coverage of the Group (including investor blogs, chat-sites and social media) and movements in Telix's share price.

If unexpected media coverage (e.g., confidential or incorrect information) or unusual price movements is identified, the matter must be reported to the Disclosure Committee, who will consider whether an announcement to a Relevant Exchange is required.

#### **8.6 Chat rooms, blogs and social networking sites**

Employees or Partners must not participate in chat room discussions on the internet, or post information on a social networking or other internet site on behalf of or as a representative of the Group, unless that person is authorised by the SVP Investor Relations and Corporate Communications, Group Company Secretary or the Disclosure Committee. Price Sensitive Information must not be disclosed by any person authorised on any such sites unless that information has been announced to a Relevant Exchange.

### **9 Policy breaches**

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Telix regards its continuous disclosure obligations very seriously and will take any breach of this Policy seriously. A breach of continuous disclosure laws has serious consequences for Telix and its Directors. Breaches of this Policy may result in disciplinary action being taken against any Employee or Partner involved in the breach, including termination of employment or engagement. Any person who becomes aware of an actual or potential breach of this Policy should immediately report it to the Group Company Secretary.

### **10 Review**

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The Board will review and update this Policy as required but at a minimum on an annual basis.

## **Annexure 1 - Examples of Price Sensitive Information**

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Telix must disclose any information that a reasonable person would expect to have a material effect on the price or value of securities issued by Telix, i.e. information which may influence persons who commonly invest in securities in deciding whether or not to subscribe for, buy or sell the securities.

Some examples of information that may require disclosure if material include:

- (a) changes in actual financial performance or projected financial performance from the previously disclosed actual or projected information;
- (b) interim and final results, including investor releases and investor presentations accompanying the release of interim and final results;
- (c) material operational or regulatory developments;
- (d) events likely to have a material effect on financial performance - either for the current period, or over a longer term;
- (e) changes to the Board, CFO or Group Company Secretary;
- (f) takeovers, mergers, de-mergers, restructures, schemes of arrangement and all other transactions involving a transfer of control or significant change in the nature or sale of Telix's activities;
- (g) share buybacks and capital reductions concerning Telix securities;
- (h) equity capital raisings for Telix;
- (i) acquisitions, divestments, strategic alliances, joint ventures or material changes in assets;
- (j) significant developments in new projects or ventures;
- (k) any matter in respect of which Directors make a recommendation to Telix's shareholders;
- (l) material changes to capital structure or funding;
- (m) dividend policy and dividend determinations/declarations concerning Telix;
- (n) material information affecting joint venture partners or non-wholly owned subsidiaries;
- (o) media or market speculation;
- (p) industry issues which have, or which may have, a material impact on Telix;
- (q) decisions on significant issues affecting Telix by regulatory bodies;
- (r) information that may have an adverse effect on the reputation of Telix;
- (s) new contracts, orders or changes in customers or suppliers that are material to Telix's business;
- (t) the granting or withdrawal of a material licence or marketing authorisation;
- (u) entry into, variation or termination of a material agreement;
- (v) proposed changes in regulations or laws that could materially affect Telix's business;
- (w) major litigation (brought by or against Telix);

- (x) significant changes in Telix's tax or accounting policies;
- (y) the appointment of liquidator, administrator or receiver;
- (z) a proposal to change Telix's External Auditor; and
- (aa) any other matter that the Board determines to be a significant matter affecting Telix.