



Anti-Bribery and Anti-Corruption Policy

Telix Pharmaceuticals Limited
ACN 616 620 369

Adopted by the Board
on 12 December 2024

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1. Purpose

- 1.1 Telix Pharmaceuticals Limited and its subsidiaries and affiliates (together, “Telix” or the “Company”), are committed to conducting its business and operations with honesty, integrity, and to the highest standards of personal and professional ethical behaviour. Telix has zero tolerance for bribery or corruption in any form whether involving public officials or commercial bribery.
- 1.2 This Policy sets out Telix's anti-bribery and anti-corruption principles to ensure the Company's compliance with applicable anti-bribery and anti-corruption laws and regulations (“Anti-Bribery Laws”) and sets the minimum standard that is applicable even in jurisdictions where local Anti-Bribery laws are underdeveloped or less stringent. Whenever regional or local Anti-Bribery Laws are stricter than the requirements of this Policy, the stricter law applies.
- 1.3 This Policy should be read together with Telix's Code of Conduct and other relevant Telix policies and procedures. Interactions with healthcare professionals both in the public and private sector (“HCPs” or “HCP”) must comply with this Policy but also with any other Telix policies and procedures in relation to interactions with HCPs.

2. Scope

- 2.1 This Policy applies worldwide to all operating companies of Telix, its directors, officers, senior management, and other employees (collectively “Employees”) as well as its consultants, contractor, representatives, distributors, dealers, vendors, and researchers controlled by, or acting on behalf of, Telix (collectively “Partners”).
- 2.2 This Policy must be complied with in all commercial or other dealings on behalf of Telix including, but not limited to, interactions with customers, retailers, local authorities, government bodies, subcontractors, and service providers.
- 2.3 For clarity, Employee Gifts, Entertainment and Hospitality and HCP Gifts, Entertainment and Hospitality or other items of value that may be transferred during interactions with HCPs follow the principles of this Policy. However, implementation of HCP interactions are governed under other Telix internal procedures (e.g., employee travel and expense policy for employee activities, and Global Manual for Healthcare Compliance and related policies and procedures for HCP interactions).

3. Summary of prohibited conduct

- 3.1 Employees and Partners of Telix must not, either directly or indirectly:
 - offer, promise, give, solicit, accept, approve, or request any Bribe, Facilitation or Acceleration Payments;
 - falsify any books, records or accounts relating to Telix;
 - offer or provide Gifts, Hospitality, or any other Benefit to Public Officials as restricted under applicable Anti-Bribery Laws;
 - make any political contribution, grant, or charitable donation on behalf of Telix in violation of applicable Anti-Bribery Laws;
 - engage with or deal with third parties or Partners acting for or representing Telix in a manner contrary to this Policy. This includes the prohibition of offering or giving Secret Commissions to those acting in an agency or fiduciary capacity;
 - cause, authorise or wilfully ignore any conduct that is believed or suspected to be contrary to this Policy or Anti-Bribery Laws, or to aid such conduct; or
 - otherwise act in a manner that creates the appearance of offering, or promising to offer, anything that could be construed as a Bribe.

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 relating to Telix's business or its products, including during a public tender, regulatory or market access approval process, with that Public Official's Government Body.
- 4.4 Any benefits (including Gifts, Entertainment or Hospitality) offered or provided must be in compliance with this Policy and with the Gifts, Entertainment and Hospitality Guidelines and can only be made with prior written approval from Telix's Group General Counsel, Deputy General Counsel or Global Compliance Officer irrespective of amount and even if they otherwise come within the limits in Annexure A.
- 4.5 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.
- 4.6 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. Exception to the Prohibition

- 5.1 A person will not be in breach of this Policy if a low-value facilitation payment or benefit is provided to a Public Official or another third party to speed up a routine legal right or entitlement (including in circumstances where there is an imminent risk of serious physical harm or to avoid vexatious imminent criminal prosecution).
- 5.2 In any event, where a payment or benefit is provided under such circumstances, that person must promptly report the situation to the Legal and Compliance Team and set out the full circumstances of that payment (including the value of the payment, the recipient, and the nature of the threat).

6. Books and records

- 6.1 As a publicly traded company, Telix has a duty to shareholders and the public and must maintain accurate records and accounts of all its transactions. This means that all transactions involving Telix's funds must be accurately and 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.
- 6.2 All invoices, agreements, receipts, and expenditure approvals must be accompanied by supporting documents which accurately describe the transaction or accounts regardless of the value or magnitude. Records must be retained for the period designated in the company records retention requirements.
- 6.3 Any false, artificial, or suspicious entries found in company books or records, or in books or records of other persons or companies with whom Telix does business with must be immediately reported to the Chief Financial Officer, the Group General Counsel or the Global Compliance Officer.
- 6.4 It is prohibited to do any of the following:
 - Make, arrange, or approve a false entry in company records;

- Disguise or create false records;
- Omit any relevant entries in company records;
- Delete or alter company records without following the appropriate company procedures that apply to that action; or
- Submit, approve, or pay expenses that are excessive, lack adequate description or supporting documentation, or appear to be improper.

7. Gifts, Entertainment and Hospitality Guidelines

- 7.1 Giving modest Gifts, Entertainment, and Hospitality , to third party Partners (current or potential), for lawful business purposes are not a breach of this Policy. However, it becomes a breach of this Policy and a criminal offence when such Gifts, Entertainment or Hospitality are offered or given for an improper purpose, such as granting research as an inducement to prescribe, recommend, or supply Telix products.
- 7.2 Accepting Gifts, Entertainment, or Hospitality from third parties should be limited and must be refused if the purpose is intended to obtain or retain business or accepted in return for any action or business decision. However, it becomes a breach of this Policy and a criminal offence when such Gifts, Entertainment or Hospitality are accepted for an improper purpose, such as granting or awarding a tender to a vendor in exchange for excessive Hospitality.
- 7.3 Hospitality 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.
- 7.4 Gifts, Entertainment, and/or Hospitality should not be accepted by or given to the same person frequently to avoid creating the perception of impropriety. 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) to avoid creating the perception of impropriety. In some locations, transparency to the recipient's employer may be required.
- 7.5 All offers and acceptances by Employees above the threshold set out in Annexure A must be recorded in the Telix Gifts, Entertainment and Hospitality register for Employees and each entry must indicate whether the Gift was accepted or declined.
- 7.6 Note Gifts and Entertainment for HCPs are not permitted under stricter applicable Anti-Bribery Laws or under Telix policies, although reasonable Hospitality and fair-market value fees for lawful and legitimate purposes are acceptable in accordance with the Global Healthcare Compliance Manual and related procedures.

8. Charitable or political donations

- 8.1 Charitable donations can be used as a form of Bribe. Therefore, charitable donations must be made in compliance with the Telix Global Grants, Sponsorships and Charitable Donations Procedure.
- 8.2 Employees are permitted to make charitable donations in their personal capacity so long as they are not made to corruptly obtain or retain any business or business advantage.
- 8.3 Any financial or other support or assistance to, including a Gift, donation, grants, sponsorship, Entertainment or Hospitality, 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 Anti-Bribery Laws of the applicable jurisdiction with written approval from the Group General Counsel, the Deputy General Counsel or the Global

Compliance Officer and compliance with any necessary limits on amounts and disclosure requirements in each jurisdiction.

- 8.4 A political donation includes payments such as memberships, entry fees and tables purchased at political fundraising events.
- 8.5 Employees are permitted to make political donations in their personal capacity so long as they are not made to obtain or retain any business or business advantage and are permitted under Applicable Anti-Bribery Laws or other applicable laws.

9. Engaging Partners

- 9.1 At times, Telix contracts with Partners to represent Telix in interactions with other external parties or Government Bodies. Partners who function as Telix representatives are subject to all applicable Telix risk screening and due diligence processes, and specific contracting requirements to ensure compliance with applicable Anti-Bribery Laws.
- 9.2 Prospective merger, acquisition, and joint business venture partners are also subject to appropriate legal due diligence (including anti-bribery due diligence), and appropriate mitigation plans must be developed to address any issues identified.
- 9.3 Any Employee who owns the business relationship with Partners is responsible for taking reasonable precautions to ensure that those Partners are ethical in their conduct of business and compliant with this Policy.
- 9.4 Unless otherwise permitted by Telix finance authorised procedures such as via corporate credit card, payments to Partners 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 Partners should constitute fair market value and be comparable to the prevailing market rates for similar services with similar expertise. Any contracts with Partners must include appropriate anti-bribery clauses requiring the Partner to comply with all relevant Anti-Bribery Laws, the Supplier Code of Conduct and provide other remedies such as audit rights.
- 9.5 The offering or giving of Secret Commissions is prohibited. Likewise, the acceptance of any Secret Commissions is also prohibited.
- 9.6 If there are any concerns or “red flags” about the conduct of Partners in their business dealings that may be contrary to this Policy, such concerns must be reported to the Legal and Compliance Team prior to proceeding or continuing with the engagement to ensure compliance with the applicable Anti-Bribery Laws.
- 9.7 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 bribes be paid, 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.

9.8 Upon receiving a report about potential bribery or corruption, Telix shall conduct relevant investigations and may suspend further payments to the Partner pending the outcome of any investigation.

10. Compliance

10.1 All Employees and Partners 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.

10.2 Any exceptions to this Policy require prior approval from the Group General Counsel, the Deputy General Counsel or the Global Compliance Officer. Exceptions must be documented and retained by the activity owner for audit and monitoring purposes.

10.3 The Legal and Compliance Team are responsible for maintaining and delivering employee training relating to this Policy. The Legal and Compliance Team are also responsible for establishing and maintaining the Telix Gifts, Entertainment and Hospitality register for Employees and a general register for recording each actual or potential anti-bribery question or notification to the Legal and Compliance Team and any exceptions granted under this Policy. The Group General Counsel or Deputy General Counsel may exclude any items from these registers which would attract legal professional privilege, provided any such items are maintained separately in the Legal confidential files).

10.4 Managers are responsible for ensuring relevant team members have completed the required training and for counselling team compliance with the principles of this Policy and related Telix policies and procedures. The responsible employee is accountable for ensuring their vendors are aware and trained in this Policy.

10.5 All employees or Partners should report any known or suspected breach or violations of this Policy through any of the Telix reporting mechanisms. Any notice of such conduct or suspected conduct must be immediately reported to any member of the Legal and Compliance team, or through employee reporting tools such as ‘Your Voice’ in ‘BOB’, or via the external reporting tool [Telix Hotline](#) or the related Telix dedicated telephone number US +1-833-214-1164 or international equivalent).

10.6 Any breach of this Policy may subject Telix to fines or reputational damage and subject employees to disciplinary action up to and including termination.

11. Review of Policy

Telix will periodically review this Policy at least every two (2) years to ensure it is operating effectively and determine whether any changes to the Policy are required.

12. Definitions

12.1 **Benefit** means anything of value, provided directly or indirectly including, but not limited to, cash, vouchers, discounts or fees (outside those permitted under a bona fide written agreement), Gifts, Entertainment or Hospitality to family members, loans, personal favours, political and charitable contributions, business opportunities (including job or internship offers) and medical care.

12.2 **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 as a kickback, for a corrupt purpose, or with the intention to improperly influence that

person to obtain or retain a benefit or business advantage that is not legitimately due, as defined under applicable Anti-Bribery Laws. For the purpose of determining if a benefit or business advantage is legitimately due, the following circumstances should be disregarded: (i) the fact that the benefit or business advantage may be (or be perceived to be) customary in the relevant market, (ii) the value (alone or in combination) is less than the benefit or business advantage and (iii) official tolerance of the benefit or business advantage in the relevant market.

- 12.3 Entertainment** means any form of personal or business entertainment including, but not limited to, sporting activities, sporting events, movie, theatre, museum visits.
- 12.4 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.
- 12.5 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, or any other item of value that is not provided in exchange for bona fide service.
- 12.6 Government Body** means any national, local, international, supranational, or municipal government body and includes a foreign Government Body and includes state owned, controlled or funded entities.
- 12.7 Hospitality** means any form of meal or travel support including, but not limited to, meals, drinks, meeting registration fees, flights, train or mileage reimbursement and hotel accommodation.
- 12.8 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. Examples of Public Officials include: employees or officers of government owned or controlled enterprises such as public institutions and state owned; private companies or a private person, entrusted with a public service mission; international, national or local public officials including of the United Nations, World Bank, World Health Organisation, the International Monetary Fund, International Red Cross, International Olympic Committee; employees of health, regulatory or market access authorities; doctors in public hospitals or who receive payments for services from a public hospital; planning officers or other employees of planning authorities; council members; police or law enforcement officers; military personnel; members of judiciary; politicians at any level of local, national or international government; candidates for public or political office; and close relatives of these individuals (e.g. parents, siblings, spouses, children).
- 12.9 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 to take up a lease at a site which A operates.
- 12.10 Telix** means Telix Pharmaceuticals Limited each subsidiary or affiliated company of Telix worldwide.

13. Recent Change Summary

Effective Date	Summary of Change	Author	Approval
12 May 2021	New Policy	Chief Governance and Risk Officer	Approved by the Board
15 December 2023	Updated for Telix employee and HCP compliance policies	Group General Counsel, Americas Compliance Officer	Approved by the Board
12 December 2024	Updated for learnings and changes in business	Deputy GC, Group General Counsel	Approved by the Board
18 May 2026	Non-material update to the Telix Hotline URL	Global Compliance Program Manager	Group General Counsel

Annexure A – Gifts, Entertainment and Hospitality given or accepted by Employees.

Value	Procedure
USD \$150 or less	May be accepted but you will need to inform your line manager in writing (including via email). Consider whether the frequency or timing of the Gift(s), Entertainment or Hospitality may create an appearance of impropriety in deciding whether to accept.
More than USD \$150	May only be accepted with written approval from your line manager and your usual member of the Legal and Compliance Team. The approvers must agree that the Gift, Entertainment or Hospitality is within the acceptable business norms and would not create the appearance of improper influence. Must be recorded in the Gift, Entertainment and Hospitality register maintained by the Legal and Compliance Team.