

Telix Pharmaceuticals 2022 Modern Slavery Statement

Telix Pharmaceuticals 2022 Modern Slavery Statement

1. Introduction

Telix Pharmaceuticals Limited (Telix) is pleased to submit its first Modern Slavery Statement (Statement) which describes:

- Our organisational structure and commitment to protection of human rights;
- The governance arrangements we have in place to assess and continuously improve our approach to addressing modern slavery risks in our operations and supply chain;
- The due diligence we have commenced to identify, manage and mitigate those risks; and
- How we evaluate the effectiveness of our governance.

This Statement relates to the reporting period 1 January 2022 to 31 December 2022 and addresses compliance with applicable statutory requirements in Australia and in the State of California, United States (U.S.).¹ Telix will periodically monitor legislative changes or criteria for applicability to other Telix entities in other jurisdictions and include any other mandatory jurisdictions in future Statements.

Telix is publishing this Statement on behalf of itself and applicable worldwide affiliates set out in Appendix 1. Appendix 1 also describes the process of consultation across the Telix Group.²

This Statement should be read in conjunction with Telix's other periodic and continuous disclosure announcements lodged with the Australian Securities Exchange (ASX), including our 2022 Annual Report incorporating our Corporate governance statement (available at https://telixpharma.com/investor-centre/).

2. Our organisational structure, purpose and products

Telix is a public company listed on the ASX (ASX:TLX), headquartered in Melbourne, Australia, with international operations in Belgium, Japan, Switzerland and the U.S., as shown in the diagram below.



1. The Statement has been prepared for purposes of the Australian Modern Slavery Act 2018 (Cth) and the California Transparency in Supply Chains Act 2010.

2. A reference to Telix, Telix Group, we, us and our and similar expressions refer collectively to Telix Pharmaceuticals Limited and its related bodies corporate.

Telix is a leader in radiopharmaceuticals, driven by our purpose to help people with cancer and rare diseases live longer, better quality lives. Telix's targeted radiation imaging and therapy technologies have the potential to transform the way clinicians can find and manage cancer and rare diseases, to inform treatment decisions and deliver personalised therapy in areas of major unmet medical need globally.

In 2022 Telix launched its first commercial product for prostate cancer imaging, Illuccix and was sold commercially in Australia, New Zealand and the U.S.. We received regulatory approval for Illuccix in Canada in 2023 and are now seeking regulatory approval of Illuccix in other countries. Telix's focus is on building the foundations to obtain regulatory approvals for other products and to deliver long-term sustainable growth to unlock the value in our world-leading, late-stage, theranostic (therapeutic and diagnostic) pipeline.

3. Our commitment

We respect human rights and recognise that our success starts with our people. We are committed to creating a safe workplace and strive for a culture that fosters diversity, equity, inclusion, belonging and wellbeing.

We are committed to operating our business with integrity and accountability including respecting worker rights, complying with employment and human rights laws, and working to prevent any child labour, modern slavery, or human trafficking from occurring in any part of our business operations or supply chain.

Our philosophy is based on and informed by the United Nations' (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

We expect our employees and relevant business partners to adhere to our values and commitments, wherever they are operating. We are striving to have a transparent supply chain and to report in a way which complies with all applicable modern slavery or human rights legislation.

4. Our operations and supply chains

Our key operations and activities in each operating jurisdiction are as follows:

Operating jurisdiction	Key operations and activities
Australia	Corporate head office in Melbourne and regional offices in Sydney and Brisbane
Belgium	 Regional office in Brussels Regional office and in-house research, laboratory and quality assurance activities in Liege Future manufacturing and research and development (R&D) activities in Brussels South following completion of fit-out and regulatory validations (See Telix's disclosures and Annual Report for further information relating to the Brussels South facility)
Japan	Regional office in Kyoto
Switzerland	Regional commercial hub in Geneva
U.S.	 Regional office in Fishers, Indiana Research and laboratory activities in Sacramento, California

Our global operations are supported by suppliers and the full year vendor spend in 2022 across the Telix Group was approximately AUD\$165M. Of the top strategic suppliers which represent approximately 80% of the spend, approximately 48% was spent on commercialisation activities, 34% on development activities and 18% on global corporate services activities.

Telix procures goods and services in the following procurement categories:

- **Direct** procurement of goods, materials and services as inputs into the production of Telix products or the delivery of Telix services. This category usually includes manufacturing services, logistic services, purchase of plant and equipment, raw materials sourcing etc; and
- Indirect procurement of goods and services to operate our business or deliver our research, development, or corporate priorities. This category includes support for corporate or professional services (including finance, tax, legal, human resources), IT equipment or services, business travel services, marketing or medical content support services,

expert regulatory, quality, pharmacovigilance or market access services, events management, research, laboratory or clinical trials services etc.

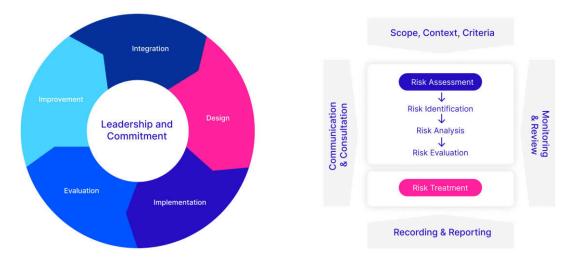
Telix also applies capital and operating expenses consistent with applicable accounting standards relating to property, plant and equipment, premises and other intangible assets – usually not a procurement category in themselves, however services may also be purchased to support such activities so are included for completeness (e.g. utilities, facilities maintenance, cleaning services, real estate negotiation services).

5. Modern slavery risk, governance and strategy

5.1 Enterprise risk management

Telix has an enterprise risk management framework, the implementation and management of which is an accountability for the SVP Global Governance, Risk and Compliance and a priority for the Telix Global Leadership Team.

The Board of Directors, through the Audit and Risk Committee, has oversight of the group risk management framework and its application to Telix operations. Our risk management strategy and framework incorporate the principles of effective risk management, as set out in ISO 31000:2018 *Risk management — Guidelines,* and is approved by the Board of Directors. This risk management strategy communicates our approach to risk management, including risk identification, measures, evaluation, mitigation, monitoring, and reporting for material strategic or operational risks.



5.2 Modern slavery governance and risk mitigation

Our governance and risk mitigation for modern slavery issues aligns with our enterprise risk management strategy and process. Our modern slavery aspirational plan between 2022-2025 includes incremental annual improvement plans to address the following elements (many of which are in place or are partially in place as set out elsewhere in this Statement):

- Establish the context (communication and consultation)
 - Consider the International Bill of Human Rights, which includes the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights;
 - The Audit and Risk Committee is briefed on issues, risks and compliance requirements associated with modern slavery issues, and makes recommendations to the Board.
- Assessment (identification, analysis and evaluation)
 - Assess potential risk in Telix operations and geographies to identify priority focus areas for Telix's direct operations;
 - New high-risk suppliers to our operations to undergo a risk-based supplier due diligence process as part of selection and onboarding;
 - Risk based contractual clauses included in relevant Telix contract templates and key supplier agreements;
 - Undertake a risk-based approach to assess existing direct suppliers and our non-direct suppliers during multiyear engagements, to gain further insights into instances or risks of modern slavery within their operations or supply chains;
 - Cross-functional working parties, led by the responsible risk owner with oversight by SVP Global Governance, Risk and Compliance, to assess modern slavery risks on at least an annual basis, to prioritise actions and update incremental annual action plans.

- Treatment (mitigation, monitoring, review and assurance)
 - Tracking adherence to our Code of Conduct (Code);
 - Effective implementation of our Supplier Code of Conduct, including building awareness and supporting suppliers to address modern slavery and human rights risks in their operations;
 - Minimum contractual clauses for compliance with applicable laws;
 - Building awareness within employee base;
 - Utilising data from complaints/grievance mechanisms to assess effectiveness of systems, policies and practices;
 - Delivering compulsory training for all staff and targeted training opportunities;
 - Utilisation of internal and/or external audit programs to verify effectiveness of internal controls and with high-risk supplier compliance with Supplier Code of Conduct;
 - The Board of Directors approves the annual Modern Slavery Statement;
 - Quarterly risk reporting to Global Leadership Team and Audit and Risk Committee and Board.

5.3 Policies and governance practices

Telix's Code sets the standards for the way we work at Telix, and provides a statement of our values to anyone dealing with Telix. It is a core element of our risk management and compliance framework. It sets clear expectations for operating with integrity, consistent with Telix's values and in compliance with applicable laws.

The Code includes emphasising the need to maintain a respectful work environment by:

- Treating all people with dignity, courtesy and respect;
- Treating people fairly and without discrimination;
- Not engaging in improper conduct;
- Being inclusive and courteous; and
- Not disparaging others or engaging in any physical or verbal harassment of colleagues.

The Code and Telix's complementary Diversity and Inclusion and Modern Slavery Policies affirm our commitment to maintaining fundamental human rights, including respecting the rights of workers, and equal opportunity employment and avoiding modern slavery. These policies apply together with our Privacy, Anti-Bribery and Anti-Corruption, Anti-Trust, Whistleblower Protection and other internal policies (including Discrimination, Harassment and Bullying), to establish the strong foundation and culture of integrity and ethical conduct expected by Telix.

Telix employees (which include consultants and contractors to the Telix Group) are expected and encouraged to speak up, ask questions to seek guidance or clarification, and report ethical or compliance concerns in good faith and without fear of retaliation. Clear instructions about this are addressed in our Whistleblower Protection Policy, which is available in English, French and Japanese as the key employee languages used across the Telix Group.

Our employees and other third parties (including suppliers and contractors) can report reasonably suspected misconduct, compliance violations or other matters, including unethical/illegal behaviour, coercion, harassment or discrimination, modern slavery, privacy, fraud or corrupt practices, or workplace safety or environmental hazards. Reporting occurs either through eligible recipients noted in our Whistleblower Protection Policy, via internal Telix employee systems or directly to independently operated third party telephone and web reporting hotlines.

Our grievance/complaints and reporting procedures all include safe and transparent processes for investigating and responding to claims and concerns in an ethical, confidential and transparent way.

During the reporting period, no reports were received under our Whistleblower Protection Policy or other means relating to human trafficking, human slavery or forced labour in our global operations.

We are also committed to continually improving our policies and procedures to reduce the risk of modern slavery in our operations and our supply chains. In 2023 and beyond, we will continue to test the effectiveness of our approach and to enhance our controls, actions and responses as we work to help drive meaningful change for people most affected by modern slavery.

6. Identifying modern slavery risks

Identification and mitigation of modern slavery risks is an ongoing and long-term concern for all businesses, including Telix. Consistent with Australian government procurement risk assessment best practice guidance, we have assessed the following dimensions:

- Sector and industry risks;
- Geographic risks;
- Products and services risks; and
- Supply chain model risks.

The following sub-sections summarise the outcome of an initial risk assessment undertaken to identify potential modern slavery risks in our operations and supply chain and to build the immediate action plan.



6.1 Our industry

According to the 2018 Global Slavery Index¹, industries with inherent high modern slavery risk are generally industries with informal, unregulated, low-paying, low-skilled or unskilled workers involved in hazardous work. Industries recognised as high-risk globally include mining, textiles and fashion, fishing, electronics, cleaning and agriculture.

Pharmaceuticals is one of the most highly regulated industries in the world, with stringent international, national and state laws and regulations governing, controlling and overseeing research, development, manufacturing, quality, safety, sale, pricing, reimbursement, distribution, and advertising of pharmaceutical products. Compliance is of the utmost importance to the companies that develop, manufacture and commercialise products, but also to the healthcare professionals who use the products and patients who depend on pharmaceutical products for their life, health and wellbeing.

Radiopharmaceuticals is more stringently regulated again and adds further layers of regulatory licensing, statutory obligation, oversight and control complexity and obligation, due to the combination of drugs and radioactive isotopes to diagnose or treat patients.

For these reasons, pharmaceutical and radiopharmaceutical research, development and manufacturing do not pose inherent additional modern slavery risks and Telix believes that the heightened regulation in radiopharmaceuticals, in fact, further reduces the level of inherent modern slavery risk in its operations and supply chain.

6.2 Our geographic footprint

While modern slavery can be found in all regions of the world, some countries are associated with a higher prevalence for modern slavery risk due to poor governance, weak rule of law, corruption, weak enforcement of labour or human rights, armed conflict or civil wars, large populations of migrant workers or displaced people. For example, countries with large populations of migrant workers recruitment fees is common practice, or where modern slavery prevalence has been well documented.

As above, Telix's operations and geographic footprint are based in Australia, Japan, Europe and the U.S., and these countries do not create inherent heightened modern slavery risks (2018 Global Slavery Index¹).

6.3 Our workforce

Approximately 95% of Telix's workforce during 2022 were permanent salaried employees. Using predominantly salaried permanent employees reduces the inherent risk of modern slavery risks, as the percentage of contract workers is low.

While the percentage fluctuates minimally during the year, contract workers are expected to continue to represent a minor proportion of resources in 2023 and beyond. Contract workers are engaged for expertise, overflow or to backfill temporary vacancies such as parental leave, and long-term sick leave. These contract workers are employed by temporary agencies or service providers, operate their own entity directly; or are engaged on short-term contract under direct Telix supervision. Where contract workers are engaged, Telix's operating preference is to co-locate in the countries where Telix has operations or established legal entity affiliate and all such countries have a lower incidence of modern slavery risks.

We also apply role governance, supplier due diligence, contractual protection and onboarding practices to contractor engagement, provide the necessary assurance and operate to further reduce modern slavery risks in practice.

Given the oversight and control we have over our direct workforce and the small number of co-located contractors engaged, we currently consider our collective global workforce to be a low modern slavery risk.

However, Telix will continue to assess and intends to improve our engagement framework governing contract workers to avoid new risks as our business and footprint expands, particularly in industries such as information technology, repairs and maintenance, cleaning services and security services for Telix controlled operational sites.

6.4 Our supplier footprint

To support our global operations, we rely on a geographically diverse supply chain and supplier footprint.

Defining our supplier risk profile

We collect and monitor internal and external information for use as data points in accordance with applicable laws to inform and improve the definition of our supplier risk profile, and support our human rights risk assessments.

Local suppliers

We recognise that modern slavery risks may potentially exist in supplier supply chains that may not be obvious from the country source of such products or services. These risks generally relate to a lack of awareness and acceptance of modern slavery risks or where there are underdeveloped human rights or labour laws. This is particularly relevant for small to medium-sized enterprises that are still developing their management capability and understanding of labour standards.

Indirect supply chains

We also recognise that modern slavery risks may potentially lie deep within supplier footprint or supply chains. There are limitations in our ability to influence our broader supply chain, but Telix will engage with our key direct suppliers on a risk basis in order to raise their awareness of modern slavery risks within their own organisations and supply chains.

While we recognise that spend does not necessarily correlate with modern slavery risk, we have included it as a relevant risk analytic because of our assumed increased ability to influence with our high-spend suppliers to address modern slavery risk.

We will continue to use a range of internal and external data sources in supplier onboarding and due diligence processes to continually improve the definition of supplier risk profile.

Sourced country risks

The majority of products and services required for Telix's business or supply chains are procured from countries such as Australia, Europe and the US. As previously stated, such countries do not create inherent heightened modern slavery risks (2018 Global Slavery Index¹).

In 2023, we will continue to work on identifying and refining the traceability of goods and services within our operations and in supplier operations, with a focus on the geographic scope and goods and services most relevant to our business.

Our sourced products and services risks

The 2018 Global Slavery Index highlights certain products and services and country sources with higher inherent risk:



Source: Bora, Adriana-Eufrosina. (2019). Using augmented intelligence in accelerating the eradication of modern slavery Applied machine learning in analysing and benchmarking the modern slavery businesses' reports. 10.13140/ R0.2.2.152577921. With the exception of electronics which are sourced from reputable international and local IT suppliers in Australia, Europe and the U.S., Telix does not purchase the above higher risk products and services from the countries named.

Our supplier risk assessment and areas of focus

Based on the rationale set out in Section 6 and when considering our actual risk and spend segmentation for our key direct supplier base, we believe that the following categories represent the potential areas for heightened scrutiny and focus as the maturity of our modern slavery compliance program evolves:

- Sourcing equipment, goods, materials and components as inputs into the manufacturing of our products. While the
 majority of our manufacturing partners are based in Australia, U.S. and Europe, it is a complex exercise to understand
 the full supply chain of our direct suppliers and their subcontractors;
- Facilities management (including cleaning services at our sites and in the office spaces we lease directly). While our facilities are in Australia, U.S., Japan and Europe, we cannot eliminate the potential risk of modern slavery, due to low-skilled, low-paid, manual work and the high prevalence of short-term, seasonal and migrant workers;
- Short term contract workers, particularly engaged by third party supplier or for clinical activities in developing countries

 although we currently only have a small percentage of short term contract workers, we acknowledge that temporary
 work, particularly in respect of work not directly supervised by us, has potential for a higher risk of modern slavery due
 to its transitory nature and potential for migrant or non-permanent resident workers; and
- Information technology product sourcing from China or Malaysia and IT service provider support services. Telix does
 not currently directly utilise offshore IT service providers and sources its IT hardware and services from reputable
 vendors, predominantly in Australia, the U.S. and Europe.

7. Actions taken to address modern slavery risks

While there is reduced likelihood of modern slavery in Telix's operations and supply chain for the reasons set out in section 6, Telix takes its ethical and corporate responsibility obligations seriously.

To uphold our commitment to protect our people and human rights, we have a range of controls and assessments across our business to identify and mitigate human rights and modern slavery risks. The following sections describe such controls and assessments, including the actions implemented during the 2022 reporting period.

7.1 Health, safety and wellbeing for employees

As a global healthcare company, we are committed to providing a safe and healthy workplace for our employees (including contractors), and to complying with all applicable safety laws and regulations. We seek to eliminate, as far as reasonably practicable, work-related injuries, illnesses and unplanned events from all aspects of our operations through comprehensive programs that are part of our health, safety, wellbeing and environment (HSWE) strategy. HSWE leading and lagging statistics are reported to the Global Leadership Team, the People, Culture, Nomination and Remuneration Committee, and the Board.

Our global safety program is designed to drive a proactive safety culture and reinforce the link between our leadership behaviours and our HSWE strategy. We believe that through visible management, leadership and employee engagement, we can increase the awareness of hazards and help employees make the right choices when it comes to HSWE.

Our wellbeing program aims to advance the conversation on mental health and provide support for employees where and when they need it. The program is designed to support our people in proactively managing mental health concerns and challenges. Through it, employees and their families can access early intervention and clinical resources, such as free, independent, and confidential support from trained professionals through our Employee Assistance Program.

Wellbeing at Telix is also monitored and addressed through regular surveys and initiatives in place to drive mental health awareness, encourage balance, and offer direct support for employees.

7.2 Human resources, including diversity, equity and inclusion

Telix is committed to an inclusive workplace that embraces and promotes diversity. Our Diversity and Inclusion Policy and human resources practices are designed to ensure that our employees and contractors are paid fairly, in compliance with applicable labour laws, and treated fairly and with dignity, courtesy and respect.

7.3 Supplier Code of Conduct

In 2022, we published a Supplier Code of Conduct which sets out Telix's global expectations for its partners and suppliers and how we intend to work with our key suppliers on ethical and responsible sourcing. Our Supplier Code of Conduct complements our Code and sets the minimum standards for doing business with Telix.

Our Supplier Code of Conduct is supported by our supplier due diligence framework – see further details in the due diligence section below.

7.4 Supplier due diligence and contracting

We acknowledge that without adequate contractual arrangements and due diligence there is a risk that we could contribute or be directly linked to modern slavery practices through our arrangements with suppliers, including beyond our Tier 1 suppliers. We take the following precautions to help verify that our suppliers meet our expectations:

- · We select suppliers based on their merit and quality of goods or services;
- Before contracting with high-risk suppliers, and periodically thereafter, we conduct targeted, risk-based due diligence on our suppliers through a tiered, risk-based program;
- We include targeted provisions in supplier contracts to request supplier compliance with applicable laws and applicable principles of relevant Telix policies;
- We require Telix pre-approval for any sub-contracting for key suppliers.

7.5 Raising awareness and training

Telix is committed to conducting its business with integrity and has in place a global ethics and compliance program designed to support compliant and ethical conduct, and to prevent and detect violations of the law and our policies.

All of our employees undertake required compliance training as part of induction, including with respect to our Code and other key policies, including the Modern Slavery Policy, the Privacy Policy, the Whistleblower Protection Policy, Diversity and Inclusion, Harassment and Bullying Policies, Health and Safety Policies. In 2023, we plan to introduce general awareness of modern slavery and labour rights training for all global employees and targeted training for relevant higher risk functions in the near future. We also raise awareness of important global community issues via internal events and programs, such as International Women's Day. Our employees can report any concerns or grievances through our "Your Voice" system and third parties (including our suppliers) can report (including anonymously) to our independent supplier reporting hotlines.

8. Assessing our actions and outcomes

This Statement is Telix's first report as 2022 was the first year that the applicable statutory regimes in Australia and California applied to the Telix Group. We acknowledge there is more that can be achieved and have developed a strategy and plan aimed at making incremental improvements in coming years.

As our modern slavery program matures, we will be in a better position to assess its long-term effectiveness. Our program will improve incrementally as we learn from internal data, management capabilities, external approaches, participation in industry-based partnerships and dialogue with our suppliers and partners.



The following is currently in place to assess the effectiveness of our actions:

- The Board, via the Audit and Risk Committee receives updates on the above actions and how Telix is progressing, together with management updates on governance, market trends and network updates that may impact the way we manage human rights issues in our operations and supply chain;
- Telix's Environmental, Social, Governance and Sustainability performance is reported in the company's Annual Report, incorporating its Corporate governance statement, which is available on our website and lodged with the ASX;
- The Board oversees and monitors incident and whistleblower reports to identify whether any complaints/grievances relating to modern slavery have been reported, and what actions have been taken to address any substantiated claims;
- Modern slavery is a risk that is actively managed as part of Telix's enterprise risk management framework. Enterprise
 risk is subject to ongoing monitoring and reported to management and the Audit and Risk Committee on a
 quarterly basis;
- Telix undertakes a risk-based phased approach to supplier due diligence and in assessing and onboarding our suppliers for applicable risks;
- Telix has published its Supplier Code of Conduct; and

• Targeted modern slavery contractual compliance clauses have been in included in key high risk vendor contracts.

9. Looking ahead

In 2023, our key focus areas will be to:

- Implement mandatory general awareness modern slavery and labour rights training for all global employees.
- Appoint a head of procurement to support strategic partner management and responsible sourcing across Telix's business, operating jurisdictions and its key suppliers.
- Further enhance our existing supplier due diligence program to include targeted specific modern slavery and human rights compliance questions for new high-risk suppliers.
- Undertake a risk-based approach to assess our key existing suppliers against public domain information to gain insight into any specific risks of modern slavery within their operations and/or supply chains.
- Where public domain identifies areas of concern with respect to modern slavery risk, to follow-up identified suppliers with specific targeted due diligence questionnaires and mitigation actions.
- Further engage, embed and encourage our key high-risk suppliers to maintain business practices and workplace standards that are comparable to the Supplier Code of Conduct and our own.
- Further strengthen contractual compliance with our Supplier Code of Conduct for key high-risk suppliers.

10. Approvals

This Statement was approved by the Board of Telix Pharmaceuticals Limited as an Australian public company and applicable reporting entity and as the ultimate parent company of Telix International Pty Ltd, Telix Pharmaceuticals (US) Inc and Telix Optimal Tracers, LLC on 24 May 2023.



Dr. Christian Behrenbruch Managing Director and Group Chief Executive Officer

Appendix 1 – Reporting entities and consultation and authorisation process

Reporting entities

Telix Pharmaceuticals Limited (ACN 616 620 369) and Telix International Pty Ltd (ACN 616 657 839) (a wholly owned subsidiary of Telix Pharmaceuticals Limited) qualify as Australian reporting entities under the Australian Commonwealth Modern Slavery Act.

Telix Pharmaceuticals (US) Inc and Telix Optimal Tracers, LLC are both entities within the Telix Group and registered in the State of Delaware, but due to operations in California or the U.S. generally qualify as reporting entities under the Californian Transparency in Supply Chains Act.

Consultation and authorisation

Whilst our business operations differ in our operating jurisdictions, our corporate governance and risk management framework applies across the Telix Group and is approved by the Telix Board.

This Statement includes input from the relevant responsible Global Leadership Team (who have responsibility for the operation of the Telix Group) and cross-functional representatives across the Telix Group, including finance, risk, people and culture, legal and company secretariat teams.

This Statement was approved by the Telix Pharmaceuticals Limited Board on behalf of itself and the reporting entities within the Telix Group. The Telix Pharmaceuticals Limited Board has authorised Christian Behrenbruch, Managing Director and Group Chief Executive Officer of Telix Pharmaceuticals Limited to sign this Statement on its behalf.

