# Telix Pharmaceuticals
# 2023 Modern Slavery and Transparency in Supply Chain Statement

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## About this Statement

Telix Pharmaceuticals Limited ("Telix") is pleased to submit our 2023 Modern Slavery and Transparency in Supply Chain Statement ("Statement") in accordance with the Australian Modern Slavery Act 2018 (Cth), the Canadian 2024 Fighting Against Forced Labour and Child Labour in Supply Chains Act, and the California Transparency in Supply Chains Act ("Applicable Laws"). This Statement updates our 2022 Modern Slavery Statement, and describes our progress and ongoing activities including:

- Our **commitment** to the protection of human rights including zero tolerance for modern slavery, forced labour practices, child labour and human trafficking;
- Our organisational **structure, operations and supply chain;**
- Our focus on **continuous improvement** including ongoing assessment of modern slavery risks;
- Our process for conducting **due diligence** to identify, manage and mitigate modern slavery risks; and
- Our methods for evaluating the **effectiveness** of our governance.

This Statement relates to the reporting period from 1 January 2023 to 31 December 2023 and addresses compliance with Applicable Laws in Australia, Canada, and in California in the United States (U.S.). Telix has prepared this Statement on behalf of itself and its reporting subsidiaries, set out in the Appendix to our Statement and applies our practices across all group companies (the "Group"), although not all entities are subject to reporting. The Appendix to our Statement also describes the process of consultation and approval across the Group. Telix regularly monitors for legislative, regulatory, and other changes or criteria for applicability to the Group in other jurisdictions and will include other mandatory jurisdictions in future Statements as applicable.

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 2023 Annual Report incorporating our Corporate Governance Statement and our Sustainability Report (available at https://telixpharma.com/ ).

## Key Updates Since Our 2022 Statement

Since our inaugural 2022 Statement, Telix has continued to make strong progress and build upon the depth of our previous work to serve as a good global corporate citizen in combatting modern slavery in our supply chain and operations. This summary table demonstrates where we started in 2022, where have made progress in 2023, and where we plan to focus in 2024.

| TOPIC | FOCUS FOR 2022 | PROGRESS IN 2023 | FOCUS IN 2024 |
|---|---|---|---|
| **TRAINING AND COMMUNICATION ON MODERN SLAVERY STANDARDS AND RISKS** | • Implement mandatory Telix Code of Conduct ("Code") and Modern Slavery policy training for all global employees at induction. | • Enhanced additional general awareness training for all employees implemented with understanding sign-off by employees. | • Continue mandatory training for all new employees and annual refresher for current employees.<br>• Train all transferring employees from acquired companies on modern slavery risks.<br>• Develop targeted training for employees with direct higher risk supplier relationships and with such partners. |
| **ORGANISATIONAL STRUCTURE** | • Overall management responsibility in accordance with corporate policy.<br>• Address modern slavery risks as part of standard risk assessment and for higher risk vendors. | • Full-time Global Director of Procurement appointed to Global Shared Services leadership team and to address responsible sourcing across Telix's business, operating jurisdictions working with our key suppliers. | • Include modern slavery risk assessment within the procurement function's periodic vendor business reviews and annual operational planning.<br>• Implement additional risk management steps for responsible sourcing as part of a fully integrated |

| | | | |
|---|---|---|---|
| | | | • vendor onboarding process led by procurement. <br> • Focus on leadership managing Telix's expanding research and manufacturing footprint, based on Telix acquisitions during 2024. |
| **POLICIES AND PROCEDURES** | • Supplement existing Modern Slavery corporate policy. <br> • Create Supplier Code of Conduct ('Supplier Code") to further engage, embed and encourage our key high-risk suppliers to maintain business practices and workplace standards that are comparable to our own Code. | • Key suppliers acknowledge and certify compliance with the Supplier Code or their own substantially similar existing policies. <br> • Adopted standard terms and conditions in our contractual relationships with suppliers requiring compliance with the Telix Supplier Code that outlines compliance obligations for modern slavery and transparency in supply chain requirements. | • Review and Refresh Modern Slavery related policy to address changes to law and business practices. <br> • Benchmark policies against third party reports and surveys from watchdog groups and academic centres that address emerging issues in modern slavery compliance. |
| **SUPPLIER AND PARTNER MAPPING AND DUE DILIGENCE** | • Identify risk areas impacting Telix's business. <br> • Map high-risk areas to existing Telix top vendor base. <br> • Create framework to enhance existing supplier due diligence to target specific modern slavery and human rights compliance for new higher risk vendors. | • Digital AI platform implemented to conduct public domain search of all relevant information, including human rights and modern slavery. <br> • Digital platform also builds multi-modality questionnaire to be sent for specific response to vendors. <br> • Where public domain identifies areas of concern with respect to modern slavery risk, follow-up identified suppliers and take mitigation actions. <br> • If required, enhanced red flag review for vendors based in high-risk countries that triggers additional diligence questions. | • Review and update our due diligence questionnaire to address changes in supply chain structure or core business as a result of acquisitions. <br> • Engage in bi-annual refresh of due diligence on all key existing suppliers. <br> • Conduct deeper supply chain mapping for radioisotope suppliers, to include "Tier 2" suppliers wherever possible. |
| **CONTRACTUAL COMPLIANCE** | • Ensure relevant contract templates include minimum compliance with applicable laws. <br> • New vendor contracts including compliance with applicable laws relevant to scope and services provided. | • Key acquisitions include detailed modern slavery and human rights contractual representations and warranties. <br> • High risk vendors include detailed contractual clauses or compliance with Supplier Code. | • Amend existing key manufacturing and clinical partner contractual terms for long-term relationships. <br> • Create targeted compliance contract template language for low, medium and high modern slavery risks, ranging from general compliance with applicable laws to Supplier Code and to specific representations and warranties. |
| **SUPPLIER AND PARTNER MANAGEMENT** | • Ad hoc assessment and management based on perceived risk or known issues. | • Detailed assessment based on external tools. <br> • Enhanced red flag review for higher risk vendors that triggers additional diligence questions or mitigation actions. | • Build a coordinated supplier onboarding process that incorporates due diligence and ongoing monitoring and identifies action owners and corrective actions. <br> • Continued evolution of our central procurement organisation, including sustainable procurement initiatives. |
| **PROGRAM AND GOVERNANCE EFFECTIVENESS** | • Identify key suppliers. <br> • Use of in-house Legal and Compliance staff in due diligence | • All new key acquisitions or business development deal partners put through AI platform search. | • Identify and use appropriate metrics for more robust evaluation of program effectiveness. <br> • Assessment against emerging modern slavery frameworks |

| assessment working with business. | • Top 50 vendors put through AI platform search.<br>• Use of AI search technology to identify and monitor in real-time modern slavery risks more effectively for existing key suppliers or partners. | (Canada) to ensure continued compliance and continuous improvement.<br>• Annual review of assessment of expanded operations to ensure compliance with existing frameworks or new laws.<br>• Adopt region-based compliance model that empowers local compliance representatives to monitor and address modern slavery risks (in consultation with Global Procurement and Group General Counsel). |

# 2023 Statement on Modern Slavery and Transparency in Supply Chain

## 1. Our Commitment

Telix reaffirms our understanding and commitment to Applicable Laws (Including the 2018 Australian Modern Slavery Act, the 2024 Canadian Modern Slavery Act and the 2010 Californian Transparency in Supply Chains Act). References to the term "modern slavery" throughout this Statement encompass a spectrum of offences defined by Applicable Laws including slavery, servitude, forced labour, human trafficking, deceptive recruitment for labour and services, debt bondage, forced marriage, and the exploitation of children, child labour and any other form of labour practice that is not in compliance with labour laws.

As a leader in the global radiopharmaceuticals industry, Telix is committed to maintain the highest ethical standards and integrity throughout our business. We acknowledge and embrace our responsibility to combat modern slavery and human rights issues or human trafficking in all their manifestations throughout our operations and supply chain. Our dedication to these principles transcends legal compliance and is a fundamental component of our organisational ethos.

In adherence to Applicable Laws, Telix pledges to implement stringent and effective strategies ensuring that our business activities and extensive supply chains remain untainted by modern slavery and human trafficking. This commitment is integrated into our corporate policies, operational procedures, and our continuous drive to enhance transparency and accountability at every organisational level.

We expect that our employees and all relevant business partners uphold our corporate values and ethical standards, irrespective of their geographic location. Our commitment to transparency extends to our supply chains and operations, and we endeavour to report in a manner that complies with all Applicable Laws, the Telix Code of Conduct ("Code") and the Telix Supplier Code of Conduct ("Supplier Code").

Further, Telix is dedicated to fostering a workplace that prioritises safety, diversity, equity, inclusion, and the overall well-being of our people. Our operational philosophy is informed by and aligned with the 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 commit to regularly evaluating and addressing the risks associated with modern slavery and human trafficking, to ensure our employees, suppliers, and business partners are aligned with and actively engaged in our ethical commitments. Through due diligence, educational initiatives, and the enforcement of our Code, our Supplier Code and our policies, we strive to protect and uphold the dignity and rights of individuals worldwide.

By integrating these principles into our core business, Telix seeks to lead with integrity, accountability, and purpose.

## 2. Our Purpose and Values

Each day Telix continues to build an extraordinary, purpose-driven company focused on acting with integrity, advancing the health, safety and wellbeing of our employees, and supporting a culture where everyone is valued. We aim for continued improvement across the spectrum of sustainability measures. Each sustainability pillar is important in managing Group risk, including modern slavery risks, but also serves as opportunities to improve financial and operating performance:

- We will improve the lives of people living with cancer and rare diseases through the development of new and innovative diagnostics and therapies.
- We will build a safe, inclusive and rewarding workplace where everyone counts.
- We will lead by example and demonstrate that ethical business is good business.
- We will live our culture of being extraordinary and pursuing our goals with determination and integrity.
- We will reduce environmental impact across our operations.

We published our first Telix Sustainability Report in 2021, which provided the starting point and a clear roadmap for our journey. Each subsequent report outlines the steps we have taken in our quest for ongoing and continual improvement across the spectrum of sustainability issues management.

**OUR PURPOSE**

**We help people with cancer and rare diseases live longer, better quality lives**

**OUR VALUES**

| Everyone counts | We strive to be extraordinary | We act with determination and integrity |

**GROWTH STRATEGY**

| Grow Illuccix® revenue globally | Commercialise the diagnostic portfolio | Advance the therapeutic pipeline | Strengthen global supply chain and manufacturing | Expand the future pipeline |

**SUSTAINABILITY PILLARS**



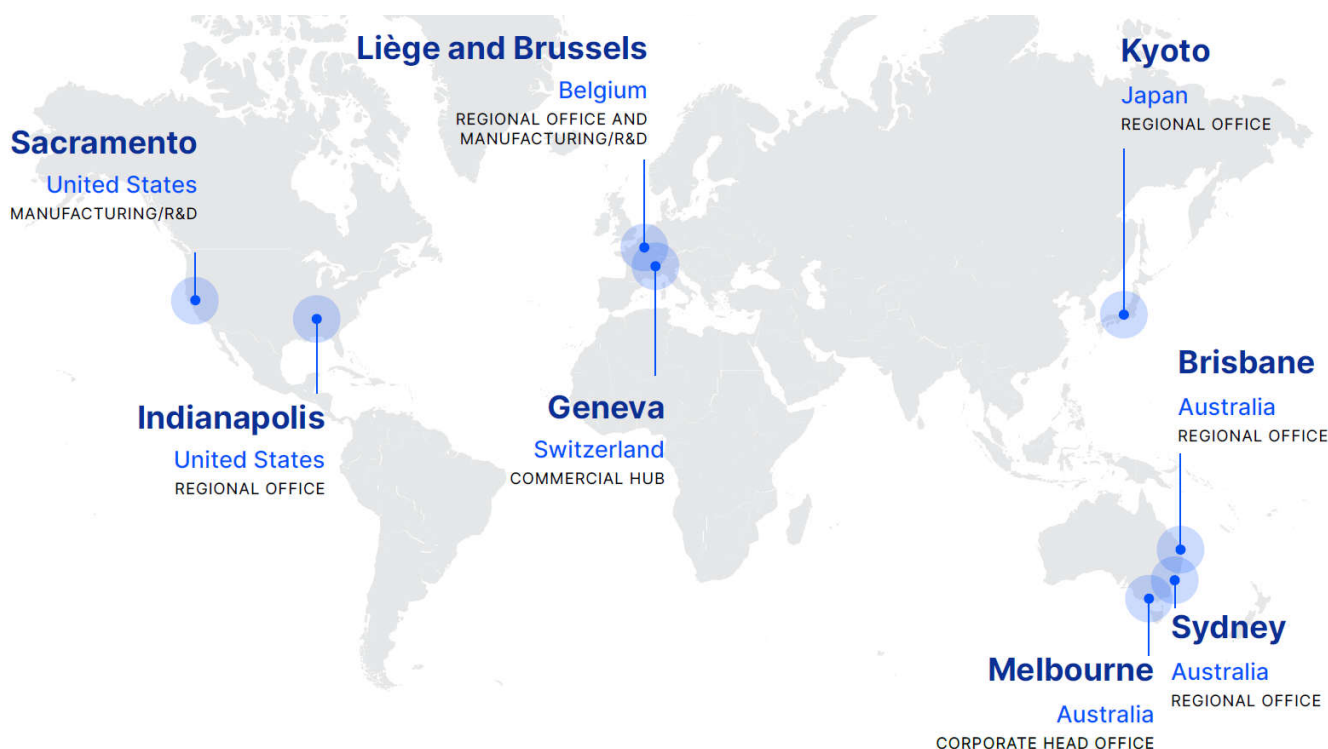## 3. Our Organisational Structure and Products

Telix is a commercial-stage biopharmaceutical company focused on the development and commercialisation of therapeutic and diagnostic radiopharmaceuticals. Our mission is to be the global leader in our field by combining therapeutic and diagnostic modalities for the benefit of patients, an innovative precision medicine concept generally referred to as 'theranostics'.

In 2022 Telix launched its first commercial product for prostate cancer imaging, Illuccix®, which 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. Additionally, Telix has either applied for, or begun the process to apply for, approval for radiopharmaceutical products for applications in the diagnosis of brain and kidney cancer.

We have an extensive pipeline of theranostic radiopharmaceutical candidates, with a focus on urologic oncology (prostate and kidney), neuro-oncology (glioma), musculoskeletal oncology (sarcoma) and bone marrow conditioning. Our theranostic approach is intended to use imaging and therapy together to 'see and treat' cancer and rare diseases, to both better inform treatment decisions and deliver personalised therapy for patients.

Our therapeutic radiopharmaceutical platform harnesses the power of radioactive isotopes combined with multi-platform targeting agents to deliver targeted radiation directly to the tumour site. These therapies have the potential to be efficacious as stand-alone treatments or as complements to existing treatment modalities, addressing areas of high unmet medical need.

Telix is a public company listed on the ASX (ASX:TLX), headquartered in Melbourne, Australia, and in 2023, had international operations and regional offices or hubs based in Europe, Japan, Switzerland and the U.S. as shown in the diagram below.



**Liège and Brussels**
Belgium
REGIONAL OFFICE AND
MANUFACTURING/R&D

**Kyoto**
Japan
REGIONAL OFFICE

**Sacramento**
United States
MANUFACTURING/R&D

**Indianapolis**
United States
REGIONAL OFFICE

**Geneva**
Switzerland
COMMERCIAL HUB

**Brisbane**
Australia
REGIONAL OFFICE

**Melbourne**
Australia
CORPORATE HEAD OFFICE

**Sydney**
Australia
REGIONAL OFFICE

## 4. Our Operations and Supply Chains

Telix continues to be differentiated by innovative nuclear medicine solutions spanning the patient treatment continuum from diagnosis, through surgical intervention, to therapy.

To date, this is best demonstrated by our offering in urologic oncology, initially for the treatment of prostate cancer. The acquisition of Lightpoint Medical's business in 2023 enhances our portfolio with the addition of SENSEI® a miniature gamma probe device used to detect radiation in patients and guide surgery. By delivering molecular imaging solutions to the operating theatre, we will build deeper relationships with key opinion leaders and physicians who use our products, better supporting patients through their cancer journey.

The acquisition of Dedicaid GmbH and its clinical decision support software (CDSS) in 2023 and AI platform has enhanced our AI capabilities. We believe that AI has an important role to play in increasing efficiency and supporting clinical decision-making to maximise the capacity of imaging infrastructure. Advanced image analysis techniques will bridge diagnostic and therapeutic medicine by personalising treatment, further optimising patient outcomes.

We have built a strong global supply, manufacturing and distribution network. This has underpinned the successful launch of Illuccix® and the delivery of many clinical trials. We continue to invest in vertical integration and manufacturing

and in 2023 we opened our state-of-the-art radiopharmaceutical production facility in Belgium – one of the largest of its kind in Europe.

In addition, the integration of Optimal Tracers acquisition in 2023 has expanded our translational radiochemistry capability and established a U.S.-based laboratory and production footprint for radiopharmaceutical doses to support clinical trials.

Our key operational locations and hub 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<br>• Regional office and in-house research, laboratory and quality assurance activities in Liege<br>• Manufacturing and research and development (R&D) activities in Brussels South |
| Japan | • Regional office in Kyoto |
| Switzerland | • Regional commercial hub in Geneva |
| U.S. | • Regional office in Fishers, Indiana<br>• Telix Optimal Tracers research and laboratory activities in Sacramento, California |

In 2023, Telix also has employees working remotely linked to hub locations or legal entities in other jurisdictions following acquisitions (e.g., in Austria after the Dedicaid acquisition or in the UK, Netherlands and Spain after the Lightpoint acquisition), however the main hubs and operational centres are specified.

Our global operations are supported by suppliers with a full year supplier spend in 2023 across the Group of approximately AUD$313M, of which approximately 47% was spent on commercialisation activities, 28% on development activities and 25% on global corporate services activities.

Telix procures third-party supplier goods and services directly and indirectly:

• **Direct Procurement – as input into Telix products:** Obtaining goods, materials and services specially used as inputs into the development or production of Telix products, or the delivery of Telix products or services. This category usually includes the purchase of manufacturing equipment; contract research or development services; goods or services used in distribution of our products; raw materials including radioisotopes; and consumables.

• **Indirect Procurement – to support operation of Telix's business:** Obtaining general goods and services to operate our business and deliver our research, development, commercial, 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 reimbursement-support services; event planning or management; catering; or research, laboratory or clinical trials services.

Telix also applies capital and operating expenses consistent with applicable international 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 and are included for completeness (e.g., utilities, facilities maintenance, real estate negotiation services).

Through enhanced due diligence activities, including both vendor-screening using digital tools and/or the completion of specific due diligence questionnaires, Telix has good visibility into supplier general practices. In 2022, Telix created and published the Supplier Code and in 2023, requested that its key suppliers acknowledge their compliance with the principles of the Supplier Code. However, Telix has limited visibility into our suppliers' own engagement of their subcontractors, and this will be an area of focus in 2024 activities for radioisotope suppliers.

## 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 Group Executive Team.

The Telix Board of Directors, through its 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.

**BOARD**
Governance and ultimate oversight of enterprise risk management

**AUDIT AND RISK COMMITTEE (COMPRISED OF INDEPENDENT DIRECTORS)**
Risk management oversight and key risk review

**GOVERNANCE, RISK AND COMPLIANCE**
ERMF strategy development, process development and implementation
(2nd line)

**INTERNAL AUDIT**
(3rd line)

**GLOBAL LEADERSHIP FORUM**
Responsible for risk identification and management in business units
Risk and opportunity owners (1st line)

**RISK AND OPPORTUNITY MANAGEMENT COUNCILS AND COMMITTEES**
Subject matter experts and leaders e.g., Global Safety Review Committee (GSRC),
Quality and Safety Evaluation Board (QSEB), Privacy Working Group

## 5.2 Modern Slavery Governance and Risk Mitigation

Telix is committed to a robust governance framework and robust risk mitigation strategies to address modern slavery, fully integrated with our enterprise-wide risk management processes. Our strategic plan focuses on achieving incremental improvements annually, enhancing our capabilities in combatting modern slavery across all operations. This plan is detailed further in this Statement and includes:

- **Context Establishment and Stakeholder Engagement**: We ensure continuous communication and consultation processes are in place, engaging with stakeholders to align our strategies with the International Bill of Human Rights, which encapsulates the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.

- **Comprehensive Risk Assessment**: Our Audit and Risk Committee receives regular briefings on modern slavery risks and compliance requirements, and provides recommendations to our Board. We conduct risk assessments of potential risks across Telix's operations and geographies to identify priority areas and continuous improvement plans. This includes identifying regions or activities with potential heightened risks and implementing a rigorous risk-based supplier due diligence process for new high-risk suppliers during selection and onboarding, incorporating modern slavery risk clauses into relevant contract templates and relevant key supplier agreements.

- **Enhanced Supplier Engagement**: We employ a risk-based approach to evaluate both direct and indirect suppliers during multi-year engagements, aiming to unearth and address any instances or risks of modern slavery within their operations or supply chains.

- **Cross-functional Collaboration**: Cross-functional working groups, led by designated risk owners and overseen by the SVP Global Governance, Risk, and Compliance, evaluate applicable risks, including modern slavery risks, at least annually. These groups prioritise actions and refresh our incremental annual action plans to stay responsive to emerging challenges.

- **Business Development Deal Due Diligence:** In our pursuit of growth through business development, licensing, collaboration and acquisitions, we adhere to a stringent due diligence process designed to ensure that any new business relationships or integrations align with our ethical standards and compliance standards, including modern slavery risks. In all acquisitions in 2023, Telix has also ensured that human rights and modern slavery compliance was accepted as a contractual condition and foundation for deal diligence, signature and completion.

- **Supplier Code Implementation**: We are committed to effectively implementing our Supplier Code which includes communications to build awareness and agreement to support its principles among our suppliers. This helps them address modern slavery and human rights risks within their operations, fostering a supply chain that is free of exploitation.

- **Contractual Compliance**: We include minimum contractual clauses in our agreements to ensure compliance with Applicable Laws, including where applicable, specific clauses concerning modern slavery and human rights and ask our key suppliers to comply with our Supplier Code.
- **Awareness Programs**: We are dedicated to building awareness within our employee base about the risks and implications of modern slavery, enhancing their ability to identify and report potential issues.
- **Active Monitoring and Continuous Improvement**: Our mitigation strategies include external monitoring of key suppliers using digital AI platforms and alerts and taking steps to ensure employee adherence to our Code and implementing our Supplier Code effectively with our suppliers. We track compliance through our contractual obligations and enhance employee awareness through mandatory and targeted training programs.
- **Utilisation of Audit and Feedback Mechanisms**: We leverage data from complaints and grievance mechanisms to evaluate the effectiveness of our systems, policies, and practices. Internal and external audits are conducted regularly to verify the efficacy of internal controls and compliance with our Supplier Code among high-risk suppliers.
- **Executive Oversight and Reporting**: The Board of Directors approves the annual Modern Slavery and Transparency in Supply Chain Statement, ensuring accountability at the highest levels. Additionally, high-risk assessments and progress on mitigation plans are reported quarterly to our Group Executive Team and the Audit and Risk Committee, maintaining a constant cycle of review and improvement.

## 5.3 Policies and Governance Practices

Our corporate purpose, mission and values reflect our patient centric focus, the innovative approach we apply across our business and our ongoing commitment to quality, integrity and achievement. Telix upholds the highest standards of ethical conduct through our comprehensive governance framework. Central to this framework is our Code, which establishes fundamental principles for behaviour across the organisation. It reinforces our commitment to integrity and compliance with Applicable Laws, and clearly outlines expectations for maintaining a respectful work environment.

We believe that how we conduct our business is as important as our results. We seek to create and maintain a corporate culture and governance practices that are rigorous and meet high ethical standards. We also seek to empower our people to conduct business in a way that is sustainable, responsible and respects the rights and dignity of all people.

Telix also encourages a speak-up culture and believes that when people speak up it can create benefits for everyone including a more diverse and inclusive environment, improved psychological safety, more innovation, better decision making and continuously improved governance, safety and compliance practices. We aim to promote a safe space and a speak-up culture to ensure that Telix People feel comfortable sharing ideas and/or raising concerns without fear of negative consequences.

Beyond the Code, the Supplier Code and the Modern Slavery corporate policy, Telix's commitment extends to comprehensive policies including Diversity and Inclusion; Health, Safety, Well-Being and Environment; Bullying and Harassment; Data Privacy; Data Breach; Data Subject Access; Information Security; Modern Slavery (distinct from, but aligned with, this Statement); Anti-Bribery and Anti-Corruption; Fair Competition; and Whistleblower Protection. These policies collectively reinforce a culture of integrity and support our risk management and compliance framework.

Our employees, including consultants and contractors, are encouraged to actively participate in upholding these standards. They are expected to report any ethical or compliance concerns through clearly defined channels without fear of retaliation. This is supported by our robust Whistleblower Protection Policy, available in multiple languages (including English, French, and Japanese) to accommodate our diverse workforce. Employees are trained on this policy, which includes zero-tolerance for retaliation for bringing a genuine concern to the attention of a Telix employee or director.

Additionally, we maintain transparent and confidential procedures for reporting and addressing grievances or complaints, which include but are not limited to issues of unethical or illegal behaviours, coercion, harassment, safety or environmental issues, discrimination, and modern slavery. These procedures ensure all reports are investigated ethically and responsively. 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.

During 2023, there were no reports of modern slavery, human trafficking, human rights abuses, or forced labour within our operations or supply chain. Looking forward, Telix is dedicated to continuously enhancing our policies and procedures. Our ongoing commitment to testing and improving our systems emphasises our dedication to reducing the risk of modern slavery and driving meaningful change, ensuring that our practices remain effective and aligned with our core values.

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 2024 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 risk in the following areas:

- **Industry**
- **Geographic Footprint**
- **Workforce**
- **Suppliers**

The following sub-sections summarise the outcome of our initial and ongoing risk assessments undertaken on potential modern slavery risks in our operations and supply chain and to build the ongoing action plan.

## 6.1 Our Industry

According to the 2023 Global Slavery Index[1], industries with inherent high modern slavery risk generally engage in workforce practices that include informal, unregulated, low-paying, low-skilled or unskilled workers involved in hazardous work or dangerous environment. Those industries recognised as high-risk globally include mining, textiles and garments, electronics, cleaning and agriculture and fishing.

The pharmaceutical and biotechnology industries are among 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 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. Furthermore, contractual relationships with and among partners within these industries place substantial responsibilities upon each other to maintain obligations as to the quality of drugs and other medical products; human rights; environmental, health or safety matters; and data privacy and security, with significant penalties for non-compliance.

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 ("radioisotopes") 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. Telix recognises, however, that due to the nature of our industry, that chemicals and other raw materials, highly specialised equipment, speciality containers, consumables, and other bespoke materials necessary to the development, manufacturing, and distribution of our products, must be sourced from outside of our Company. In many cases, there are limited sources of the radioactive raw materials and a limited number of applicable third-party vendors that produce these materials, including radioisotopes. In Section 6.4 (Our Suppliers) we will discuss our current approach to reducing modern slavery risks and those continued opportunities we have for enhancing transparency in our 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, where charging workers recruitment fees is common practice, or where modern slavery prevalence has been well documented.

For Telix, most of our operations take place in Australia and the United States, two countries that are among the top five for strongest government response to modern slavery according to the 2023 Modern Slavery Index. Further, our global operations do not include any country that the 2023 Global Slavery Index has described as high-risk for modern slavery.

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1.  2023 Global Slavery Index. Minderoo Foundation Pty Ltd. https://www.walkfree.org/global-slavery-index.

While our operations are based in countries generally associated with lower modern slavery risks, we remain vigilant about the broader geopolitical factors that could influence these conditions, such as governance quality, legal frameworks, and the prevalence of migrant labour. We continuously monitor these factors to pre-emptively address any potential issues, especially as our global footprint expands or our clinical research or commercial activities expand into other parts of the world.

## 6.3 Our Workforce

Approximately 97% of Telix's workforce during 2023 were permanent salaried employees. Using predominantly permanent salaried 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 or temporary workers ("contractors") are expected to continue to represent a minor proportion of resources in 2024 and beyond. Further, the vast majority of these employees are "knowledge workers" with tertiary education and qualifications such as graduate certificates, bachelor degrees, master degrees and doctorates.

The majority of our contractors are highly educated, often engaged for expertise, overflow or to backfill, and either filling a temporary vacancy or required for surge-resourcing due to the nature of a project, such as staffing a shorter-term clinical study. These contract workers are generally employed by temporary ("temp") agencies or service providers; operate their own sole-proprietorship directly; or are engaged on short-term contract under direct Telix supervision. Where contractors are engaged, Telix's strong preference is to co-locate them in the countries where Telix has operations or established legal entity affiliate. As mentioned in Section 6.2, 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. Moreover, Telix will continue to generally assess and intends to improve our engagement and governance 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.

As part of our strategy, Telix continues to invest and acquire its own specialist research, manufacturing and supply chain capabilities and with this reduction in reliance on third party suppliers, Telix brings more control in-house and will take the necessary steps to ensure modern slavery and human rights compliance as part of the operational transition following acquisition completion. In December 2022, Telix acquired its Optimal Tracer business with specialist research and development to enhance its radiochemistry capabilities and this business was fully integrated during 2023.

Additionally, in Q2 2024 Telix acquired development and manufacturing sites located in the United States and Canada. These sites (located near Vancouver, British Columbia in Canada; and Austin and Angleton, Texas in the United States) operated as independent companies prior to their acquisition. Prior to acquisition of all such capabilities, Telix did not find any substantial workforce-related concerns with modern slavery, or violations of the Applicable Laws and now includes modern slavery diligence and contractual representations and warranties as part of its usual deal-making process for acquisitions. However, as part of our continued integration and operation of these sites during 2024, Telix will continue to monitor these sites, as well as any future acquired or constructed sites connected with these businesses, for any potential modern slavery or human rights concerns. Should Telix uncover significant modern slavery concerns during the operational integration of these sites, including relating to the use of contractors at these sites, Telix will take steps to enforce and remediate consistent with the principles under this Statement. Telix expects to provide additional details related to its post-integration assessment of any 2024 acquired sites in the 2024 update to this Statement.

To secure the future and to deliver effective operations, in 2024 Telix has also reorganised its operations teams into a unified function under the leadership of a Group Chief Operating Officer, who is a member of our Executive Team with responsibility to manage our physical sites, office facilities and third party manufacturing teams. We believe this leadership development will also further consistency in related supplier management and strengthen governance and oversight for our own sites, including managing sustainability and modern slavery risks.

## 6.4 Our Suppliers and Partners

To enhance our commitment to addressing modern slavery risks across our diverse and global supply chain, Telix has implemented a comprehensive approach aligned with Applicable Laws

**Defining Our Supplier and Partner Risk Profile:** Telix actively collects and analyses both internal and external data to refine our understanding of supplier and partner risks. This process is integral to our broader risk assessments, ensuring

compliance with Applicable Laws and facilitating a deeper insight into the potential vulnerabilities within our supply chain, operations or in our deal strategy, including modern slavery risks. In 2023, we implemented digital tools which enable us to assess relevant modern slavery risks using all relevant public domain sources of information and which if further risks are identified, enables us to send out automated further specific due diligence questionnaires and/or engage industry experts for detailed red-flag reporting and investigation. All existing key high-risk suppliers were baselined and reviewed using these sources during 2023, in addition to new higher risk suppliers and all major new deal partners.

**Local and Indirect Engagement:** Telix acknowledges that modern slavery risks can exist at various levels of our supply chain and operations, particularly when goods or services come from regions with underdeveloped human rights and labour laws. This is especially true for small-to-medium sized enterprises still developing their compliance oversight capabilities and understanding of modern slavery frameworks. However, there are limitations in our ability to influence our broader supply chain, particular for suppliers of rare radioactive source materials. Regardless, Telix does 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. To mitigate any risks identified, we work directly with our suppliers to elevate their awareness and capacity to manage modern slavery risks effectively. With the establishment of our new procurement organisation in late 2023, we also expect centralised procurement led supplier management to build on this foundation enhancing the impact with our key higher risk suppliers.

**Continuous Monitoring and Improvement:** Telix's commitment extends beyond initial supplier assessments. Our digital tools enable us to receive real-time updates on our key suppliers and partners. We monitor our supply chain, using a range of tools and metrics, including spend analysis, which, although not directly correlating to modern slavery risks, helps prioritise our engagements where we can exert the most influence. Our ongoing due diligence processes are designed to adapt to new insights and global best practices.

**Geographic and Product-Specific Risks:** While the majority of our procurement comes from regions with lower risk profiles such as Australia, Europe, and the U.S., Telix remains vigilant against complacency. We are committed to enhancing the traceability of goods and services, focusing particularly on those geographical areas and products identified by the Global Slavery Index as higher risk.

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

- Manufacturing chain complexity: Telix acknowledges the complexities of global manufacturing networks and strives to ensure transparency and compliance throughout our entire supply chain, including both direct suppliers and their subcontractors. While the majority of our manufacturing partners are based in Australia, Europe and U.S., we do not always have clear line-of-sight into their own subcontractors or sources of input into manufacturing, creating opacity and some uncertainty in mapping the full supply chain of our direct suppliers and their subcontractors.

- Radioisotope and raw materials supply: Telix understands that because of the nature of the radiopharmaceutical industry, sourcing certain raw radioactive materials, precursor materials or radioisotopes, may present challenges to complying with modern slavery frameworks. Not only is the supply chain for such materials (including radioisotopes and their precursor materials) at times very fragile with single-source-of-failure, but it may require the use of a single-source suppliers. Telix's supply chain and distribution strategy requires partnerships with key suppliers, but also includes various deal acquisitions or partnerships with credible partners in Europe, Canada, U.S. and Australia to explore new and secure sources or technology which can improve radioisotope supply and access. Telix purchases radioisotopes from suppliers based in Australia, Belgium, Canada, Germany, Israel, the Netherlands, Poland, and the U. S. However, Telix recognises that the radioisotopes or precursor materials may only be available from a limited number of countries that, according to the 2023 Global Slavery Index, have high numbers of persons in a form of forced labour or modern slavery including Russia, Türkiye, and South Africa. While we contractually require radioisotope suppliers to obtain the radioactive source materials from countries in accordance with Applicable Laws and export (sanctions) regulations, because of restrictions to supply we have limited ability to compel our suppliers to restrain from obtaining those materials from countries that may have a high burden of persons subjected to modern slavery.

- Clinical trial or commercialisation expansion into emerging markets: Telix's clinical studies are planned to maximise the patient unmet need and historically have been initiated in the countries or regions where our operations exist such as Australia, Europe or U.S. As our footprint and access expands, this is expected to result in new countries for clinical trials and ultimately if regulatory approval is granted after successful trials, new country possibilities for commercialisation. As a result, Telix is also considering that an emerging risk for modern slavery compliance is expansion into newer and less established or regulated markets. In case of such emerging market expansion, our risk management strategy is to use qualified and expert local partners that meet Telix's ethical standards and agree to

comply with the Supplier Code. We will also manage modern slavery risks consistent with our usual governance, due diligence and risk assessment and ongoing monitoring practices.

- <u>Facilities management and contract labour:</u> Telix's directly owned or leased facilities operate for the purpose of specialist manufacturing, research and development activities and by definition require highly skilled and technical resources qualified and expert in the complex science required. Our acquisition footprint is increasing the potential modern slavery exposure as more facilities come under Telix's direct management and control. However we believe establishment of the new Operations division in 2024 lead by our new Chief Operating Officer, will only enhance control and effectiveness for those facilities. However, Telix will not be complacent, we continue to recognise the potential risks associated with low-skilled and manual labour, particularly in general facilities management or maintenance roles, and the use of short-term contract workers in areas such as cleaning services, landscaping, and security. Telix implements strict oversight and governance to protect workers consistent with local labour laws. In facilities that we directly own or lease, we have more control over the selection and oversight of short-term contract workers to better ensure compliance with modern slavery risks. We recognise in other facilities we lease, particularly multi-tenant facilities, we may not be able to eliminate or substantially reduce risks related to short-term contract employees in facilities management or maintenance roles.
- <u>Technology sourcing and support services:</u> Given the residual specific risks associated with sourcing IT components from regions like China or Malaysia, Telix ensures that our procurement practices from these regions meet our high standards for ethical sourcing. Telix does not currently directly utilise offshore IT service providers and continues to source its IT hardware and services from reputable vendors, predominantly in Australia, Europe and U.S.

**Future Commitments:** As our modern slavery compliance program matures, Telix is dedicated to refining our strategies and enhancing our engagements across our supply chain, our operations and with our deal partners. We will continue to assess, adjust, and report on our efforts to prevent modern slavery, driving meaningful change and ensuring the integrity of our business. We discuss some of those efforts in Section 9**.**

Through these measures, Telix reaffirms its commitment to ethical practices and compliance with the stringent requirements of all Applicable Laws, ensuring that our operations and supply chains remain free from modern slavery.

# 7. Actions Taken to Address Modern Slavery Risks

Compared to companies that operate in other industries, Telix has a reduced likelihood of modern slavery risks in its operations and supply chain for the reasons set out in Section 6. However, Telix takes its ethical and corporate responsibility obligations seriously and will uphold our commitment to protect our people and the human rights of those who may be affected by corporate decisions. In that spirit, we have instituted a range of controls and assessments across our business to identify and mitigate these risks. The following sections describe such controls and assessments, including improvements implemented during the 2023 reporting period.

## 7.1 Health, Safety, Wellbeing and Environment for Employees

As a global health care 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 Group Executive 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 "well being" 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.

Well being 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.

Telix also takes the privacy of its employees seriously. It complies with all Applicable Laws and regulations relating to the confidentiality and use of employee or candidate personal information. Telix maintains a strong IT security infrastructure that is compliant to applicable ISO standards.

## 7.2 Human Resources, Including Diversity, Equity and Inclusion

Building on our commitment to an inclusive and respectful workplace, Telix actively integrates our core values into all human resources activities, especially recruitment and employee relations. Telix strongly believes that employees are core stakeholders; we seek to create a company culture that attracts and retains the best talent. Our HR strategies are designed to foster an environment where diversity is not only recognised but celebrated.

**Recruitment and Onboarding:** At Telix, we ensure our recruitment processes are transparent, inclusive, and fair, aiming to attract a diverse range of candidates. This starts with unbiased job advertisements, equitable interview practices, and inclusive onboarding sessions that emphasise our values of respect and diversity. Our hiring practices are strictly compliant with labour laws and we conduct salary benchmarking periodically to ensure that all employees are compensated fairly and equitably.

**Training and Development:** We invest in regular training programs that promote ethical behaviour and respect among employees. This includes diversity and inclusion training and leadership development programs tailored to uphold our commitment to fairness and respect in the workplace. These initiatives help employees understand the impact of their behaviours and the importance of fostering an inclusive environment.

**Performance Management, Career Advancement and Equity:** Our performance management system is designed to be transparent and merit-based, ensuring all employees have equal access to career advancement opportunities regardless of their background. We conduct regular reviews that are fair and objective, focusing on professional achievements and adherence to our ethical standards. We engage in compensation practices that include meaningful equity grants to most employees that promotes mutual long-term investment.

**Employee Engagement and Feedback:** We maintain open channels of communication with our employees, encouraging them to share their insights and feedback on workplace practices. Regular surveys, town halls, and feedback sessions are conducted to gather employee perspectives, particularly on issues related to workplace respect and diversity. This feedback is crucial for continuous improvement of our people and culture policies and practices.

**Respectful Workplace Policies:** Telix enforces strict policies against harassment and discrimination. We have clear guidelines and procedures for employees to report any incidents, ensuring they are addressed promptly and effectively. Our commitment to a respectful workplace is reinforced through visible leadership support and accountability measures that ensure all employees can work in a safe and dignified environment.

**Monitoring and Compliance:** To ensure ongoing compliance with our policies and the effectiveness of our diversity initiatives, we regularly review and update our people practices. Compliance audits, participation in industry benchmarks, and alignment with global best practices in people management are integral to our strategy.

Through these comprehensive people practices, Telix not only complies with labour laws but actively promotes a culture of respect, inclusivity, and ethical behaviour that supports our broader corporate objectives.

## 7.3 People

At Telix, our governance structures and specialised roles are instrumental in mitigating the risks of modern slavery across our operations. Our approach integrates key positions and processes to ensure compliance and ethical practices throughout our supply chain and internal operations.

In addition to the role of our Group Chief Executive Officer and Managing Director, as well as the members of our Board of Directors, corporate officers, and other senior members of our leadership, these key roles play an outsized role in maintaining our culture of accountability for our commitment to reducing modern slavery risks.

**Procurement Team:** This team is pivotal in strengthening our sustainable procurement strategies and vendor onboarding and management, ensuring that all procurement processes are transparent and adhere to ethical standards. The Global Director of Procurement oversees the implementation of rigorous supplier diligence, onboarding processes and ongoing vendor management of our key suppliers, working closely with suppliers to promote compliance with the Supplier Code, including modern slavery and human rights requirements.

**Operations Team:** This team of manufacturing, facilities, supply chain, quality and other operations professionals is pivotal in consolidating and effectively delivering operational efficiency and execution to support our corporate strategy. This newly created division in 2024, led by our Chief Operating Officer, will strengthen and consolidate existing supply chain expertise and operations that delivers on our high ethical standards for our own facilities and for those that are controlled by our key suppliers.

**Global Business Development and Alliance Management Team:** This team, led by our SVP of Global Business Development and Alliance Management, play a pivotal role in our partnership, collaboration and corporate strategy. This team is responsible for executing the deals consistent with Telix's deal governance processes and comprises our experts driving collaboration, acquisitions and alliance management activities with our key partners and are well placed to expand the impact of our modern slavery efforts through our key partnerships or collaborations.

**Finance and Accounting Team**: Our finance and accounting professionals, overseen by our Group Chief Financial Officer, play a crucial role in monitoring financial transactions for any signs of unethical practices that might indicate modern slavery. They ensure that payments to suppliers and contractors go through stringent checks and balances, aligning financial flows with our commitment to ethical operations.

**Legal and Compliance Team**: Telix's legal and compliance team, led by our Group General Counsel, establishes the necessary governance frameworks for overall modern slavery compliance and takes steps to ensure that all applicable contracts are in compliance with Applicable Laws and our internal policies. The team is responsible for incorporating modern slavery clauses into contracts and advising on legal matters related to compliance and risk, including compliance with emerging modern slavery and transparency in supply chain laws.

**Senior Vice President (SVP) of Governance, Risk and Compliance**: This executive oversees the integration of modern slavery risk assessments into our broader risk management framework. The SVP of Governance, Risk and Compliance ensures that risk strategies are up-to-date and effective, coordinating across departments to address potential vulnerabilities.

## 7.4 Supplier Code

The Supplier Code establishes our global expectations for our partners and suppliers. It describes how we intend to work with our key suppliers through ethical and responsible sourcing. Our Supplier Code for suppliers complements our Code for employees and sets the expectation of minimum standards for doing business with Telix.

Our Supplier Code is supported by our supplier and partner due diligence framework (outlined in Section 7.4), bi-annual acknowledgement processes and where appropriate for higher risk suppliers or partners, contractual compliance language.

## 7.5 Procurement, Supplier Due Diligence, and Contracting

To ensure Telix complies with Applicable Laws, and aligns with best practices, our approach to procurement, supplier due diligence, and contracting has been further enhanced. We have expanded our strategic actions to include more rigorous and transparent measures:

**Leadership and Structured Oversight:** The appointment of a global director of procurement centralises our efforts to maintain high standards across all procurement activities, including vendor onboarding and vendor management, ensuring a unified strategy that is robust for sustainable procurement generally and modern slavery risks. This position sits on the Global Shared Services staff, with full responsibility across the Group for maintaining our obligations for compliance with our policies and procedures related to supplier management as well as advising business teams on best practices including compliance with modern slavery standards.

**Supplier Selection and Evaluation:** Our selection process prioritises merit and ethical operations, extending beyond so-called "Tier 1" suppliers (e.g., suppliers that directly supply Telix with goods or services) include deeper layers of the supply chain. We evaluate suppliers not only for the quality of goods and services, but also for their compliance with human rights standards.

**Enhanced Due Diligence Processes:** We conduct enhanced due diligence on suppliers and partners, especially those in high-risk categories. This includes comprehensive questionnaires before contracting and use of databases and AI tools for corporate entities and principal owners. We further enhance our due diligence with targeted questions for suppliers based in high-risk countries.

**Contractual Commitments:** Our relevant supplier contracts, including standard terms and conditions, are fortified with clauses that enforce compliance with Applicable Laws and our internal policies, including our Supplier Code.

**Pre-Approval and Monitoring of Subcontracting:** We require pre-approval for any subcontracting by our key suppliers to maintain control over the extended supply chain and prevent dilution of compliance standards.

**Proactive Compliance and Incident Response:** Continuous monitoring and regular audits are conducted to ensure ongoing compliance. This includes tracking the effectiveness of actions taken against modern slavery and adapting strategies based on findings.

**Termination and Enforcement Policies:** Should any supplier fail to meet our standards or contracts, we are committed to taking decisive action, including contract termination, to uphold our ethical commitments.

**Reporting and Transparency:** Actions and outcomes related to modern slavery are regularly reported to the Audit and Risk Committee and included in our public disclosures, such as the Annual Report and Corporate Governance Statement. This ensures accountability and transparency in how we manage human rights issues.

Through these expanded and detailed strategies, Telix aims to drive meaningful change in the industry, actively working to eradicate modern slavery across all aspects of our supply chain and ensuring compliance with both legal requirements and ethical standards.

Additionally, as mentioned in Section 6.3, in 2023 Telix took steps to acquire additional development and manufacturing sites located in the U. S. and Canada. These sites (located near Vancouver, British Columbia in Canada; and Austin and Angleton, Texas in the U. S.) operated as independent companies prior to their acquisition. Prior to acquisition, Telix did not find any substantial concerns with modern slavery, or violations of the Applicable Laws. Telix will continue to monitor these sites, as well as any future acquired or constructed sites, for any potential modern slavery concerns.

## 7.6 Raising Awareness and Training title

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 and on a periodic basis during employment, including with respect to our Code, the Modern Slavery Policy, the Privacy Policy, the Whistleblower Protection Policy, Diversity and Inclusion, Harassment and Bullying Policies, Health and Safety Policies. In 2024, we will conduct refresher awareness of modern slavery and labour rights for all employees. We also raise awareness of important global community issues via internal events and programs, such as International Women's Day, Indigenous Peoples' Days, and other dates commemorating and bringing awareness to historically underrepresented or marginalised persons.

Moreover, our employees can report any concerns or grievances through our internal "Your Voice" system and third parties (including our employees, suppliers or whistleblowers) can report (including anonymously) to our independent supplier reporting hotlines.

## 8. Assessing Our Actions and Outcomes

Building on the foundation established by our inaugural 2022 Statement, Telix continues to refine our approach to addressing modern slavery risks within our operations and supply chain, demonstrating our commitment to continuous improvement and to build a sustainable and ethical company. Recognising the complexity and evolving nature of modern slavery challenges, we focus on making systematic and incremental improvements each year.

**Continuous Improvement and Long-term Effectiveness:** We are dedicated to achieving year-on-year improvements in line with this Statement. This commitment is guided by a structured approach to continuously refine our practices and enhance the effectiveness of our initiatives. As our modern slavery program matures, we anticipate a more robust capability to evaluate its long-term effectiveness. We anticipate that our program will, in the future, be enhanced by a more data-driven approach, including internal performance data, advancements in management practices, insights from external benchmarks and collaborative industry initiatives, and insights from regular dialogue with our suppliers and partners.

**Current Measures to Assess Effectiveness**:

- Governance and oversight: The Audit and Risk Committee, supported by the Board, regularly reviews updates on our modern slavery initiatives, encompassing governance enhancements, market trends, and network changes that might influence our approach to managing human rights issues.
- Transparency and reporting: Our commitment to transparency is reflected in the inclusion of Environmental, Social, Governance, and Sustainability performance details within our Annual Report and related corporate governance documents. These documents are publicly available on our website (www.telixpharma.com) and filed with the ASX.

- **Incident monitoring and response:** The Board actively oversees and evaluates incident and whistleblower reports to identify and address any modern slavery related complaints or grievances, ensuring responsive and appropriate action is taken. To date, no such modern slavery complaint has been received. We also use digital tools for real-time monitoring of developments on an ongoing basis for our existing supplier and partner base.
- **Risk management:** Modern slavery risks are integrated into Telix's broader enterprise risk management framework, which is continually monitored. Risk assessments and related findings are reported to the management team and the Audit and Risk Committee quarterly.
- **Supplier engagement and compliance:** We employ a phased, risk-based approach to supplier due diligence, assessing new suppliers or partners for potential risks related to modern slavery. Our Supplier Code, which outlines our expectations and requirements, is published on our website, and we have integrated targeted modern slavery compliance clauses in contracts with high-risk vendors.

## 9. Looking Ahead

Telix is proud of the progress we've made in 2023. But 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 Telix grows, we recognise we also must continue to mature our modern slavery and supply chain transparency programs. This includes better assessments of long-term effectiveness. Our program will improve incrementally as we learn from internal data, management capabilities, external approaches, participation in industry-based partnerships and discussions with our suppliers and partners.

For 2024, Telix reaffirms our commitment to a robust and continuous journey toward modern slavery compliance. Our approach is structured around actionable steps and the integration of advanced technologies to ensure consistent improvement and adherence to evolving legal standards.

**2024 Plan and Next Steps**

- **Geographic expansion:** Our 2024 initiatives will also reflect adjustments necessitated by the inclusion of Canada in our compliance framework, following new modern slavery legislation that came into effect on 1 January 2024. We also anticipate we will need to review whether operations in additional jurisdictions, including Brazil and the UK, will require additional certifications to comply with local rules in those countries.
- **Deepening supply chain insights:** Future actions include conducting deeper supply chain mapping specifically for third-party isotope suppliers (so-called "Tier 2" suppliers). This effort aims to enhance transparency and manage risks more effectively across our extended network in a potential risk area. We also expect it will give our operations teams valuable information to help de-risk sourcing where points in the supply chain are easily broken or supported only by a single-source supplier.
- **Bi-annual vendor assessments:** In addition to the real-time monitoring and updates that occur using our digital tools, we plan to send out bi-annual due diligence refreshers to our key vendors to ensure continuous compliance and up-to-date risk management.
- **Strengthening supplier and partner management:** The evolution of our recently established procurement team will further bolster our partner management capabilities, ensuring that our suppliers and partners align with our high standards of ethical conduct and compliance. One key role of this team will be to more consistently enforce existing policies and procedures around supplier management (including sustainable procurement and modern slavery issues) and to identify gaps for improvement. We will also continue to ensure modern slavery and human rights issues are built into strategic acquisitions for the company and work with our alliance management teams liaising with key partners to identify further opportunities for streamlining and strengthening modern slavery compliance in the ongoing management of our partner collaboration activities.
- **Acquisition integration.** We acknowledge that our recent acquisitions with more direct research, development and manufacturing capability and additional physical sites have the potential to increase modern slavery risks within our control. In 2024, we will diligently work to integrate these new sites and operations into the Telix modern slavery risk and governance framework
- **Metrics and business integration:** As Telix enhances our internal compliance with supplier management policies and processes, we will ultimately have better data to determine program effectiveness. Also by enhancing our internal systems for more robust reporting, we will work to identify appropriate metrics to measure effectiveness and embed continuous improvement. We will look for ways to embed these metrics into our business processes to monitor progress and make informed decisions. We plan to use these and other compliance and quality metrics to support clearer planning with our senior team, our Board, and other stakeholders around core integrity initiatives, which we ultimately see as a business opportunity and a valuable asset to our customers and the patients that we all serve.

Through these comprehensive measures, Telix is enhancing its framework to combat modern slavery effectively. We seek to address immediate compliance needs and to consider dealing with modern slavery risks as a key pillar in our foundation for sustainable and ethical growth in the face of a dynamic global business environment.

## 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 those subsidiaries listed in the Appendix to this Statement as of 22 May 2024.

**Dr. Christian Behrenbruch**
**Managing Director and Group Chief Executive Officer**

# Appendix – Reporting Entities and Consultation and Authorisation Process

## Reporting Entities in 2023

Telix Pharmaceuticals Limited (ACN 616 620 369) and Telix Pharmaceuticals (Innovations) 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 entities within the 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 California Transparency in Supply Chains Act. Telix Pharmaceuticals (US) Inc. also engages in the commercialisation (sales and marketing) of radiopharmaceutical products.

Telix Pharmaceuticals (Canada) Inc., is an entity within the Group and registered with the province of British Columbia, Canada, and qualifies as a reporting entity under the 2024 Canadian Fighting Against Forced Labour and Child Labour 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 Group and is approved by the Telix Board.

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

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