

Introduction

This Code of Conduct policy provides a guideline for appropriate behavior expected from all Altium employees. It is not intended to cover all issues that may arise, but rather to provide a framework within which employees can address ethical issues that may arise through the daily business of the company.

Altium is committed to conducting business in accordance with its values and with honesty and integrity. The conduct of every employee is vital in achieving this aim. Employees should perform the duties associated with their position to the best of their ability in a diligent, impartial and conscientious manner, whilst embodying the company's core values.

Altium's Core Values are:

1. Diversity in thoughts
2. Transparency
3. Ingenuity
4. Perseverance
5. Adaptability
6. Agility

Code in Practice

Every employee should:

- Act in accordance with the company values in the best interests of the company
- Act honestly, ethically and responsibly whilst maintaining a high standard of personal integrity
- Comply with all legislative, industrial and administrative requirements and any lawful direction made by a person with the authority to give such a direction. They are also to comply with relevant laws, regulations, policies and procedures and to know and understand the law and regulatory environment applicable to the performance of their duties.
- Take all possible care in the use of company property, goods and services and ensure they are used efficiently and honestly
- Engage in fair dealing with the company's customers, suppliers, competitors and employees, and ensure all company, supplier, customer and employee information is respected and treated in accordance with data privacy laws and Altium's data privacy policies.
- Strive to keep up to date with advances and changes in the knowledge of professional and ethical standards relevant to their areas and expertise
- Continuously strive to improve individual and company performance
- Not take or seek to take improper advantage of any property or information gained in the course of employment for personal gain or to cause detriment to the company or its customers

- Treat fellow employees with respect and not engage in bullying, harassment or discrimination. No employee should harass or discriminate against other employees in work practices on the grounds of gender, pregnancy, race, marital status, disability, sexual preference, political or religious belief, age or any other such characteristics.
- Treat everyone with courtesy, respect and sensitivity to their rights and provide all necessary and appropriate assistance
- Act responsibly and according to policy when becoming aware of any unethical behavior or wrong doing by any employee, reporting breaches of the code to the appropriate person or body within the company
- Not elicit the improper influence or interest of any person to obtain promotion, transfer or other advantage.
- Avoid personal activities or financial interests that could cause a conflict of interest with his/her employment with Altium. Disclose and deal appropriately with any conflicts between personal interests and duties as a director, senior executive or employee.
- Restrict the use or disclosure of confidential and/or non-public information, except where disclosure is authorized or legally mandated.

Breaching the Code

Management are expected to report breaches of the code to the Director of Human Resources. All material breaches of the Altium Code of Conduct are expected to then be reported immediately to the Chair of the Human Resources Committee who will keep the Board informed with regards to the handling of these breaches.

Amendments to this Policy

This policy cannot be amended without approval from Altium's Board. It will be reviewed annually to ensure that it remains effective and meets best practice standards and the needs of Altium.

Policy documents covering specific matters should be read in conjunction with this code. Relevant policies include, but are not limited to:

- Diversity
- Data Privacy
- Whistleblower
- Anti-Bribery & Corruption

Reviewed and Amended 19 August 2019