

## Modern Slavery Policy

### Purpose:

The purpose of this policy is to affirm Altium's commitment to maintaining and improving our systems and processes to avoid complicity in human rights violations or, more broadly, the practice of modern slavery. We acknowledge that human trafficking and slavery are exhibited forms of modern slavery and we strive to combat these and any other type of coerced labor both in our business and supply chain.

### Context:

Australia's Modern Slavery Act 2018 (Cth) – designed to combat modern slavery in global supply chains – requires all Australian and overseas corporate entities conducting business in Australia with at least AU\$100 million of annual consolidated revenue to submit for publication a Modern Slavery Statement (MSS) following each reporting period.

The MSS is required to assess and address modern slavery risks in Altium's operations and supply chains. We are implementing this policy as part of our efforts to play our part in combatting modern slavery in global supply chains so as to govern our internal and supplier arrangements.

The term modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery has severe consequences for its victims as it can often involve grave abuses of human rights and the commitment of serious crimes.

Modern slavery, however, is used to describe only serious exploitation. The practice includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, and deceptive recruitment for labour and/or services. Modern slavery also extends to the worst forms of child labour, which often involves circumstances where children are subject to slavery or similar practices, or otherwise engaged in hazardous and harmful work.

### Scope:

This policy applies to all employees and contractors of the Altium Group (which encompasses Altium Limited and all its subsidiaries and legal entities).

### Policy:

Altium will submit an annual MSS for each relevant reporting period. Altium will ensure the MSS complies with our obligations under Australia's Modern Slavery Act. The MSS will be approved by the Board of Altium Ltd and submitted to the Australian Border Force for assessment and publishing on the Online Register for Modern Slavery Statements.

Altium's current core principles for ensuring this policy is maintained can be summarised as follows.

1. All employment at Altium is contracted voluntarily and is never the subject of threats, coercion or exploitation.
2. Altium does not condone modern slavery in its business operations nor within or along its supply chains.
3. Altium expects suppliers to understand and abide by its Supplier Code of Conduct at all times, both when seeking to engage with Altium and throughout the duration of the engagement.

Any Reports or allegations of violations of the policy will be investigated immediately, this will include reports arising from our Whistleblower Policy and any other policies which are to be read in conjunction with this policy.

## **Implementation and Governance:**

### **1. Risk Assessment**

- 1.1. Altium will conduct a risk assessment to determine which part of the operation or supply chain would be most at risk to incidents of slavery or human trafficking. Any issues identified during the assessment will be actioned.

### **2. Supplier Management:**

- 2.1. Altium will conduct due diligence with suppliers as part of the engagement process to ensure they understand our expectations, including any reporting or audit requirements, and the necessary controls and standards.
- 2.2. A review of employment fees, contracts, worker rights and control systems will be conducted. We require this set of expectations to be acknowledged on an annual basis by all suppliers.
- 2.3. A Supplier Code of Conduct will govern supplier engagement with Altium.

### **3. Internal Accountability**

- 3.1. Altium will publish an annual statement on steps taken during the year to identify risks of modern slavery and the actions that have been taken.
- 3.2. We will seek feedback from employees, suppliers and stakeholders on efforts to mitigate risks associated with modern slavery and apply to a process of continuous improvement in our efforts.

## 4. Communication and Education

- 4.1. The policy will be communicated to employees via the intranet and update meetings. Suppliers will receive the Supplier Code of Conduct as part of their engagement with Altium.
- 4.2. Altium employees who have a responsibility to provide contracts or enter into agreements with suppliers will receive additional training on due diligence.

Accordingly, this Policy is to be read in conjunction with the following Altium Policies:

- Whistleblower Policy;
- Diversity Policy;
- Code of Conduct;
- Ethical Behavior Policy;
- Anti-Bribery and Corruption Policy; and
- Human Rights Policy.

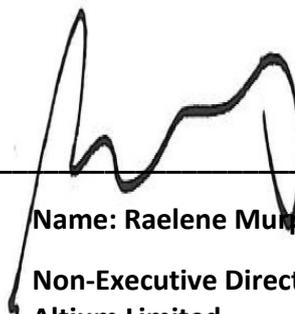
**This Policy has been approved by the Board of Altium Limited on 31 March 2021.**

Signed



**Name: Samuel Weiss**

**Chairman  
Altium Limited**



**Name: Raelene Murphy**

**Non-Executive Director  
Altium Limited  
Chair Audit and Risk Committee**

**Date: 31 March 2021**