

Altium Code of Conduct

Introduction

This Code of Conduct policy provides a guideline for appropriate behavior expected from all Altium directors, senior management and employees. It is not intended to cover all issues that may arise, but rather to provide a framework within which directors, senior management and employees can address ethical issues that may arise through the daily business of Altium Limited (“Altium” or the “Company”). For the purposes of this Code of Conduct, unless expressly stated otherwise or where the context requires, any reference to Altium “employees” including Altium’s executive and non-executive directors (whether or not they are employees) and senior management.

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.

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- 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; or ; or
 - their position or the opportunities arising therefrom,for personal gain or to cause detriment to Altium 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 wrongdoing 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.
- Attend relevant training from time to time and as required.

Breaching the Code

Management is expected to report breaches of this Code confidentially to the Group General Counsel, Chief People Officer or member of the Human Resources team. All material breaches of this Code are expected to then be reported immediately to the Chair of the Human Resources Committee who will, in confidential consultation with the Committee, keep the Board informed with regards to the handling of these breaches, which may include appropriate and proportionate disciplinary actions against those persons. In addition, where an employee breaches the law they may be personally liable.

Amendments to this Code

This Code may not be amended without the approval of the Human Resources Committee and the Altium Board of Directors. It will be reviewed annually.

Policy documents which we consider should be read in conjunction with this Code are as follows:

- Diversity Policy
- Whistleblower Policy
- Anti-Bribery & Corruption Policy

Amended and Adopted by the Altium Limited Board

13 August 2021