

SUPPLIER CODE OF CONDUCT

Altium Limited (Altium) is committed to ensuring high standards of environmental, social and governance performance across our supply chain.

The Supplier Code of Conduct helps Altium uphold its core values. We believe that respect for human rights, social and labour standards, the environment, and ethical business practices is foundational to our business operations and successful engagement and collaboration with our suppliers.

Supplier Conduct

As a global operation, Altium acknowledges and values the important role of suppliers in our business operations and success. We are committed to maintaining and improving practices and processes, conducting appropriate due diligence, and implementing policies and procedures to address any significant risks in our supply chain.

The Supplier Code of Conduct (code) sets out the behaviours and business practices Altium expects of its suppliers. Where suppliers operate in countries that have requirements and standards less stringent than this code, suppliers are expected to uphold this code for their business.

Governance and Ethics

Altium expects ethical behaviour from its employees and seeks suppliers that align and adhere to these same principles. This includes an expectation that suppliers will:

- comply with local, national and international applicable laws;
- conduct business in a manner that is fair, honest and lawful;
- ensure high standards of transparency, disclosure and audit integrity in relation to business activities and financial performance;
- disclose to Altium and avoid or appropriately manage any actual or potential conflicts of interests that may arise due to personal or business relationships;
- ensure that assets, property, information and position are used only for authorised and legitimate business purposes and are not misused for personal gain, including taking advantage of any material, non-public information in relation to Altium that a supplier may become aware of;
- maintain confidentiality and privacy of information entrusted by Altium and its stakeholders (such as employees and customers), except where disclosure is authorised;
- apply adequate data protection and security to protect Altium data from unauthorised access, use and disclosure and notify Altium immediately if the supplier becomes aware of a data breach;
- work against all forms of corruption including bribery, fraud, personal or improper advantage, whether direct or indirect through a third party such as a supplier or contractor; and
- have a whistle-blower policy or similar procedure in place to protect employees or other persons who raise concerns in good faith.

Risk Management

Altium expects its suppliers to take an active approach to preventing and managing risks. If a risk or breach (or suspected breach) arises, Altium expects its suppliers to provide timely notification. This notification is encouraged to include identification and communication of issues which will better enable the proactive management of possible solutions and impacts to business.

Environment

Altium is committed to the environmentally responsible management of our business and operations. We recognise that environmental risks can impact our business and affect the communities in which we operate. Altium is committed to ensuring these risks are identified, assessed and managed responsibly and we expect the same behaviour from our suppliers. Altium expects suppliers to:

- demonstrate compliance with applicable environmental laws, regulations and contract requirements;
- seek ways to minimise any adverse environmental impact across their operations and supply chain, including in relation to biodiversity, waste, water, and emissions; and
- take a proactive approach to managing environmental risks.

Human Rights and Labour Practices

Altium supports the protection of human rights and is guided by fundamental principles such as those in the United Nations Universal Declaration of Human Rights. Altium strives to support human rights through the supply chain by encouraging supplier practices that actively identify, assess and manage human rights issues. Altium expects suppliers to:

- treat all workers with dignity and respect and promote a diverse and inclusive work environment;
- provide a workplace free from harassment, discrimination and bullying, whether on the basis of gender, age, disability, ethnicity or cultural affiliation, sexual orientation, belief, educational background or any other basis prohibited by applicable law;
- ensure that child labour is not used, or any form of forced involuntary labour, and comply with local laws relating to minimum age of employment;
- provide a safe work environment, in compliance with all applicable laws regarding working conditions and health and safety procedures;
- have written labour, workplace, health and safety policies and standards;
- respect the right for freedom of association; and
- provide fair and appropriate pay, benefits and working conditions.

Assessment and Compliance

Altium expects suppliers to respect and comply with the criteria set out in this Code and maintain the necessary tools and management systems to support this compliance. Altium reserves the right to conduct compliance assessments to verify compliance with this Code. Suppliers are expected to fully respond and cooperate when action is required before, during or as a result of these assessments.

Such assessments may be in the form of: self-assessments; questionnaires, site visits or requests for supporting documentation such as policies, procedures or records. Altium expects this information to be provided in a timely manner and to represent a true and correct record of the supplier's operations and related supply chains.

If suppliers consider that they cannot comply with this Code, they should contact their business contact at Altium immediately. Altium reserves the right to cease business or choose not to work with suppliers who do not comply with this Code. It is the supplier's responsibility to educate its employees, agents, subcontractors and extended supply chain about the principles and obligations in this document.

Supplier Acknowledgement Process

All suppliers are required to formally acknowledge their compliance with the requirements set out in this document. This supplier acknowledgment is a contractual commitment that is in addition to any other contracts or terms and conditions between any entity in the Altium Group and the supplier.

Raising concerns about improper conduct

Altium's suppliers are able to confidentially report concerns about improper conduct by Altium or the supplier. Improper conduct includes a breach of law, a breach of Altium's Code of Conduct or policies, dangerous conduct, financial misconduct or unethical behaviour.

Any genuine concerns about improper conduct may be reported in confidence to the external independent whistleblower service at altiumwhistleblower@deloitte.com.au which is an independent and confidential function that oversees Altium's Whistleblower Service.

This policy is available on the Altium website www.altium.com.

APPROVED BY THE ALTUM BOARD JULY 2023