

Purpose

The purpose of this policy is to assist in maintaining, or increasing, investor confidence and satisfaction in the accessibility of company information. Altium aims to achieve this by communicating effectively with shareholders, giving them timely access to balanced and understandable information and making it easy for them to participate in general meetings, whilst adhering to the ASX Listing rules and corporations law continuous disclosure requirements.

Objectives

Altium aims to concisely and accurately communicate to shareholders:

- our strategy;
- how we implement that strategy; and
- the financial results consequent upon our strategy and its implementation.

The board of directors aims to ensure that the shareholders are informed of all major developments affecting the company's state of affairs.

Communication Methods

Information is communicated to shareholders through:

- The annual report.
- The interim report.
- Disclosures made to the Australian Stock Exchange.
- Notices and explanatory memoranda of annual general meetings (AGM).
- The AGM where it is both company policy and the policy of the auditor for the lead engagement partner to be present at the AGM and to answer questions about the conduct of the audit and the preparation and content of the auditors' report.
- Occasional letters from the board chair and CEO to specifically inform shareholders of key matters of interest.
- Shareholder Newsletters
- Press releases regarding new products developments etc.
- The company's website, www.altium.com.au, which has a dedicated investor relations section.

Communication considerations

1. Continuous disclosure

The continuous disclosure regime is fundamental to the rights of shareholders to receive information concerning their securities. The most important aspect of Altium's shareholder communication policy is to comply with the continuous disclosure regime and implement best practice disclosure policy. Altium endeavours to release all price sensitive information immediately to the market unless it falls within the ASX Listing rule exemptions. The decision to release information rests with the CEO who is responsible for insuring compliance with the both ASX Listing rules and the corporations law.

Market announcements are viewable directly after release to the ASX via a link on Altium's website to the ASX Company announcements site. Where ASX provides financial results briefings to analysts or media, all material released during these briefings (such as slides or presentations) is released as soon as possible on the Altium website. Whilst it is the aim of Altium not to cover any material information which has not been previously released to the market is covered in such briefings should such information be disclosed Altium will immediately release it to the market. Altium will not engage in "black-listing" of analysts or commentators based on their reporting of Altium.

2. Insider trading

The insider trading rules are an important adjunct to the continuous disclosure regime in ensuring that shareholders are given fair access to material information regarding securities. Altium seeks to limit the opportunity for insider trading in its own securities through its continuous disclosure policies and the Altium share trading guidelines it has in place for employees and directors.

3. Financial Reporting

Transparent and prompt financial reporting is key element of listed company disclosure. Altium reports operating results quarterly and produces half yearly and yearly financial reports and an annual report in accordance with the Corporations Act and listing rules. Altium aims to report promptly, comply with all applicable laws, listing rules and accounting standards in its financial reporting and to report in a way which is easy to understand and conveys the materiality of the matters discussed.

4. Other information about ASX

Altium makes non-material announcements about itself from time to time via media releases available on Altium's website, which may be of interest to shareholders and other stakeholders.

5. Shareholder meetings

Shareholder meetings are an opportunity for shareholders and other guests to hear from and question the board and management of ASX. Altium endeavours to hold meetings in a central location to encourage all shareholders of the company to participate. The Chairman addresses the meeting separately before attending to voting on resolutions and general business, this address is released to the market prior to the commencement of the meeting. The chair of the meeting, usually the Chairman, is responsible for the conduct of the meeting. Altium's auditor attends its annual general meeting and is available to answer any questions regarding the conduct of and any issues arising from Altium's audit. Altium makes available the results of the resolutions put to shareholders immediately they are confirmed and available via an announcement release to the ASX.

Altium accepts nominations for the board of Altium that are made to the Company Secretary in accordance with the listing rules and Altium's constitution. Altium conducts annual and extraordinary general meetings in accordance with the Corporations Act, the ASX Listing Rules, Altium's Corporate Governance council guidelines and constitution.

Altium drafts notices and proxy forms in accordance with ASX best practice recommendations to maximise the ability of readers to understand and vote on the issues presented.

6. Technology

Altium will always consider how best to take advantage wherever practicable of new technologies that provide:

- Greater opportunities for more effective communications with shareholders.
- Improved access for shareholders unable to be physically present at meetings.

Altium will also investigate ways of using technology to simplify voting and to electronically distribute material regarding meetings, although due to Altium's comparatively small share register, many new technologies currently available are not cost effective for the company to utilize at this time.

The CEOs/Altium Board is responsible for approving all processes for the establishment and oversight of electronic communications channels and ensuring they meet ASX Listing Rule and Corporations Law requirements.

7. Correspondence and reports to shareholders

Altium corresponds periodically with all shareholders to update them on the company's activities and progress. The correspondence is signed by the Chairman and may at times accompany dividend payment advice or cheques.

8. General interaction with shareholders

Altium deals with shareholder enquiries promptly and courteously and takes measures to ensure that its agent, Computershare Investor Services Pty Limited, also does so.

9. Shareholder Privacy

Altium recognises that privacy is important and will not disclose registered shareholder details unless required by law. Shareholder details will only be used in accordance with applicable privacy laws.

10. Crisis communications

At all times Altium will ensure that disclosure is both timely and non selective. Whether news regarding the company is positive or negative, Altium will meet all disclosure requirements and endeavour to keep the market informed of all price sensitive information. Should it be necessary Altium will consider implementing a trading halt if it is unable to disclose information or if a false market has resulted from unsubstantiated rumours.

The following company officers in order of seniority are able to communicate with the market should a crisis arise, should a more senior level officer be available, officers below them are only able to make announcements at the direction of the senior officer.

1. CEO
2. The Altium Board of directors
3. Company Secretary
4. Chief Financial Officer
5. Senior Executives
6. Corporate Communications Officer