

1. Introduction

This Code of Conduct (Code) provides a guideline for appropriate behaviour expected from all Altium directors, employees and representatives of Altium. It is not intended to cover all issues that may arise, but rather to provide a framework within which directors, employees and representatives of Altium 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” includes Altium Board members as well as Altium’s officers, employees and consultants, whether full or part time or casual, and all persons working for the Altium Group under a contract or a consultancy agreement, wherever located .

The Code of Conduct applies to all work-related activities (including conferences, training and other events) anywhere in the world. It applies both during and outside business hours at all work sites, including when working from home or remotely, attending a work function and representing Altium at an external function.

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 treats any breach of the Code seriously. Actual and suspected breaches of the Code will be investigated and may result in disciplinary action which can range from warnings, impact to discretionary remuneration or dismissal.

2. Altium’s Core Values

1. Big Thinking (in pursuit of purpose)
2. Diversity (of thought)
3. Courage (of conviction)
4. Transparency (of intent)
5. Ingenuity (of AND)
6. Agility (of action)
7. Adaptability (of approach)
8. Grit (in pursuit of mission)

3. 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. Employees should also comply with relevant laws, regulations, policies, and procedures 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 other

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:
 - a. any property or information gained in the course of employment; or
 - b. their position or the opportunities arising from their employment, 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, gender identification, political or religious belief, age, family/caring responsibilities 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.
- Take all reasonable steps to protect their safety and safety of others in the workplace.
- Complete and adhere to assigned induction, training and competency requirements.

4. Breaching the Code

If an employee becomes aware of a breach of the Code of Conduct or has reasonable suspicion of a breach, the employee should report the matter to their immediate line manager or a member of the Human Resources team.

Management is expected to report breaches of this Code confidentially to the Group General Counsel, VP Human Resources or member of the Human Resources team. All material breaches of this Code are expected to 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 action against those persons. In addition, where an employee breaches the law they may be personally liable.

Depending on the nature of the breach, a report will be prepared by the Company Secretary for the Audit and Risk Management Committee should it be apparent that the company's control environment needs to be re-evaluated.

If an employee is not comfortable reporting the matter to management or the Human Resources team, the employee should report the matter in accordance with Altium's Whistleblower Policy. The Altium Board is committed to ensuring employees feel safe to express matters of genuine concern and ensuring they are not disadvantaged or discriminated against for reporting concerns.

5. Review

This Code will be reviewed annually by the Human Resources Committee who will make any recommendations for any amendments to the Board.

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

Further information:

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

APPROVED BY THE ALTium BOARD JULY 2023