

# Altium Communication Policy

## Purpose

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The purpose of the Altium Communications Policy is to maintain and increase, investor confidence and satisfaction in the accessibility of our company information. Altium aims to achieve this by communicating effectively with shareholders, giving them timely access to balanced and understandable information, and facilitating their participation in general meetings, whilst adhering to the Australian Securities Exchange Listing rules and Corporations Act continuous disclosure requirements.

## Objectives

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Altium aims to concisely and accurately communicate to shareholders:

- our corporate strategy;
- implementation of our corporate strategy; and
- our financials.

The Altium board of directors aims to ensure that the shareholders are informed of all major developments affecting Altium.

## Communication Methods

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Information is communicated to shareholders through:

- Our annual and interim reports
- Market disclosures released to the Australian Securities Exchange
- Our Annual General Meeting and associated AGM documentation
- Open investor conference calls
- Investor presentations
- Media releases
- Our website, [www.altium.com](http://www.altium.com)

## Communication Considerations

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### 1. Continuous disclosure

The continuous disclosure regime is fundamental to ensuring that shareholders and the market receives information in compliance with the ASX Listing Rules and the Corporations Act.

Altium aims to safeguard the confidentiality of corporate information to avoid premature disclosure which may misinform or mislead the market. Altium's Group General Counsel and Company Secretary acts as the Disclosure Officer responsible for liaising with ASX in relation to continuous disclosure issues and ensuring that announcements and any trading halts are undertaken in accordance with this policy.

Any ASX market announcements will be published on our website. Where Altium provides financial results briefings to analysts or media, all material released during these briefings (such as slides or presentations) will be released on the Altium website.

## 2. Financial Reporting

Transparent and prompt financial reporting is a key element of listed company disclosure. Altium produces half yearly and yearly financial reports and an annual report in accordance with the Corporations Act and ASX 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.

## 3. Other information about Altium

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.

## 4. Shareholder meetings

Shareholder meetings are an opportunity for shareholders and other guests to hear from and question the board and management of Altium. Altium endeavours to hold meetings in a central location and/or using appropriate and available technology to encourage all shareholders of the company to participate. The Chairman addresses the meeting separately before attending to voting on resolutions and general business, and 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 ASX Listing Rules and Altium's constitution. Altium conducts annual and extraordinary general meetings in accordance with the Corporations Act, the ASX Listing Rules, ASX Corporate Governance Council Principles and Recommendations and Altium 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.

## 5. 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 CEO/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 Act requirements.

## 6. 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.

## 7. 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.

## 8. Crisis communications

At all times, Altium will meet all applicable disclosure requirements and endeavour to keep the market informed of all price sensitive information. Whether news regarding the company is positive or negative we will ensure that disclosure is both timely and non-selective. 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. Altium Board of directors
3. Group General Counsel
4. Company Secretary

## 9. Employee obligations

All Altium employees are responsible for reporting to the Disclosure Officer if they become aware of any information that may be price sensitive. Employees are also required to notify the Disclosure Officer if they believe any prior disclosure to the ASX is inaccurate or incomplete. Employees must maintain the confidentiality of Altium's information to ensure no information is inadvertently or improperly disclosed which may cause Altium to breach its obligations under the Corporations Act and/or the ASX Listing Rules.

## 10. Periodic Review

This policy will be annually reviewed to ensure that it is operating effectively and in accordance with all applicable laws and the ASX Listing Rules.

**Amended and Adopted by the Altium Limited Board  
28 August 2021**