

1. Overview

Altium is committed to supporting lawful and ethical behaviour in all of its activities. It requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

As employees and representatives of Altium, we have a duty to practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations. Our duty extends to the reporting of any activity which may represent a breach of ethical behaviour that relates to Altium's activities.

2. Ethical Employment Practices

Altium is an equal opportunity employer and strives to ensure fair recruitment, promotion and retention practices are followed at all times. Altium is committed to a policy of advancement based on qualifications and merit and does not discriminate in favor of or in opposition to the employment of relatives or friends of current employees, or those in a personal relationship¹ with current employees ("relatives").

Due to real and perceived conflicts that may arise from hiring relatives, such as favoritism or personal conflicts, Altium will only hire relatives of a currently employed person if the candidates for employment will not be working directly for or supervising a relative. Further, candidates for employment will not occupy a position in the same line of authority in which employees can initiate or participate in employment decisions. If there are questions pertaining to what constitutes a relative, line of authority or employment decisions, please contact the VP, Human Resources.

3. Open Door Policy

Altium's open door policy encourages employees to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases your line manager is in the best position to address an area of concern. However, if you are not comfortable speaking with your line manager or you are not satisfied with a response, you are encouraged to speak with someone from Human Resources (HR) or any line manager you are comfortable speaking with. Managers are required to report any suspected breach of the Ethical Behaviour Policy to HR who depending on the seriousness of the breach will report the matter to the Company Secretary.

HR in consultation with the Company Secretary is responsible for the investigation and resolving of reported concerns. Depending on the nature of the breach a report will be prepared by the Company Secretary for the Human Resources Committee or the Audit and Risk Management Committee should it be apparent that the company's control

¹ Personal relationship is defined as an ongoing or personal relationship that can include, but not limited to, dating, living together or being a partner or significant other.

environment needs to be addressed.

4. Acting in Good Faith

Anyone reporting a complaint concerning a breach or suspected breach of this policy must do so acting in good faith with reasonable grounds for believing the information disclosed indicates a breach of the code. Any allegations that cannot be substantiated and which prove to have been made maliciously or knowingly false will be viewed as a serious disciplinary offense.

5. Confidentiality

Under this policy those who report illegal or improper activity will be protected. Any breach or suspected breach of this policy may be submitted on a confidential basis by the complainant or may be submitted anonymously. Altium will make efforts to treat a report of unethical or illegal conduct as confidential, consistent with the need to investigate and prevent or correct the action.

6. No Retaliation

No individual who in good faith makes a report shall suffer harassment, retaliation, or adverse employment consequence. Any person who retaliates against an individual for reporting or participating in an investigation of illegal or improper activity will be subject to disciplinary action.

REVIEWED AND APPROVED BY THE BOARD 11 AUGUST 2022

Policy Revisions

Date of last policy revision	Details
14 June 2016	Revised Policy
11 August 2022	Revised Policy