

1. Introduction

We believe that respect for human rights, social and labour standards, the environment, and ethical business practices is foundational to our business operation and engagement with our suppliers. As a global operation this view applies wherever we do business. We are committed to maintaining and improving practices and processes, conducting due diligence and implementing policies and procedures to address any salient risks in our supply chain.

This Supplier Code of Conduct (Code) sets out the behaviours and business practices we expect of our 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.

“Supplier” refers to any business, company, corporation, person or other entity that sells, or seeks to sell, any services or goods to Altium, including the Supplier’s employees, agents, and other representatives.

2. Compliance with applicable laws

We expect that our suppliers comply with local, national and international applicable laws, including but not limited to all anti-corruption, competition, business licensing, data protection and privacy, environmental, export control, health and safety and labour laws.

3. Bribery and corruption

Altium strives to maintain a high standard of integrity, investor confidence and good corporate governance to realise its core values including transparency and ingenuity. This can only be achieved and maintained if the community is confident that Altium employees are not influenced by gifts, benefits and bribery.

Suppliers are prohibited to give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly, including payments, gifts or other favours intended for inappropriate business advantages to and from Altium employees, contractors, consultants, secondees and directors wherever located. Altium employees are similarly prohibited from soliciting such favours from suppliers.

4. Data protection and privacy

Data protection and privacy are key priorities for Altium. We are committed to adhering to global data protection laws and standards to ensure that we remain responsible stewards of the data that is under our control. We expect our suppliers to adopt a similar approach and to implement systems and procedures to ensure that they comply with all relevant laws and regulations. We expect our suppliers to:

- treat Altium data as confidential and use only for the purposes of the contract;
- 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.

5. Labour practices

We expect all suppliers to:

- treat all workers with dignity and respect and promote a diverse and inclusive work environment;
- not discriminate in hiring, compensation, access to training, promotion and termination of employment or retirement on grounds of social, cultural, ethnic or national origins, religious or other beliefs, caste, gender, marital status, pregnancy status, sexual orientation, disability, age and trade union membership;
- ensure that child labour is not used 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;
- respect the right of employees to freedom of association and collective bargaining (including the right not to associate) in accordance with relevant laws and regulations and not to discriminate, intimidate or retaliate against employees as a result of their decision;
- maintain mechanisms for employees to identify and submit grievances (e.g. confidential suggestion boxes, hotlines, etc.), ensure that employees are made aware of grievance mechanism options and understand that they can make use of these without fear of retaliation, intimidation, harassment or discrimination;
- ensure that working hours comply with all applicable laws and regulations; and
- ensure that wages comply with legally mandated minimums required by applicable local laws.

6. Modern slavery

Suppliers must ensure that there is no forced or compulsory labour including slavery, human trafficking, servitude, debt bondage and deceptive recruiting in any part of their business or in their supply chains. Employees must be free to leave their employment after reasonable notice. Employees must not be required to lodge deposits, money or papers with their employer unless required by applicable law. We expect our suppliers to have appropriate controls and checks in place to monitor this.

7. Insider trading

If a supplier becomes aware of material, non-public information relating to Altium, its business, its customers or any other business partner, the supplier must not buy or sell securities or otherwise engage in any action to take advantage of that information, including passing that information on to third parties.

8. Environment

We are committed to the environmentally responsible management of our facilities and activities and expect the same behaviour from our suppliers. We expect our suppliers to:

- comply 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.

9. Compliance

We expect 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 may verify compliance to this Code. This may be in the form of self-assessments; questionnaires, site visits or requests for supporting documentation such as policies, procedures or records. We expect 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. We reserve the right to cease business or choose not to work with suppliers who do not comply with this Code.

10. 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 Altium entity and the supplier.

Supplier acknowledgment shall be provided through the signature of the acknowledgment document attached as Appendix A to this document by an authorized representative of the company. This signed acknowledgment should be emailed to the Altium business contact for the supplier.

11. References

This Code has been benchmarked to leading international standards. These include the following:

- United Nations Universal Declaration of Human Rights (UDHR)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- United Nations Global Compact's (UNGC) core values on human rights, labour standards, the environment and anti-corruption
- International Labour Organisation (ILO)'s core conventions

Related internal documents:

- Anti-Bribery and Corruption Policy
- Human Rights Policy
- Modern Slavery Policy

12. Material Policy Revisions

Version	Approval Date	Effective Date	Details
1.0	16 February 2022	16 February 2022	New Policy