

Ethical Behaviour Policy

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.

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 are 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 Audit and Risk Management Committee should it be apparent that the company's risk management system needs to be addressed.

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.

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.

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 & Revised 24 August 2015