

MODERN SLAVERY STATEMENT 2024

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Altium Limited
ACN 009 568 772

Preamble

This is the Altium Limited ACN 009 568 772 (Altium, we or our) Modern Slavery Statement for the 2024 Financial Year (Statement). It outlines the steps we have taken to identify and address modern slavery risks within Altium and in our supply chain.

At Altium, our purpose is to transform the electronics manufacturing industry. Printed Circuit Board (PCB) design and manufacturing are at the very heart of the global software engineering and electronics production ecosystem. Altium is uniquely positioned within that ecosystem as a software design platform with a cloud-first strategy that is open and accessible to all engineers, executives and other parties.

Given the global reach of our business within an increasingly connected world, we are committed to addressing modern slavery risks that may exist within our business and our supply chain.

We recognise that our approach to modern slavery is not just to follow the law, or conduct business in an ethical or moral way, but is part of the trust our people, shareholder, customers, suppliers and other stakeholders have in Altium.

Introduction

About this Statement

This Statement is made by Altium in accordance with our legislative obligation to annually disclose those modern slavery risks that exist within our operations and supply chains as well as the actions adopted to identify, prevent, mitigate and remediate those risks.¹

This Statement:

- Refers to activities in the period of 1 July 2023 to 30 June 2024 (FY24) and our plans for further improvements during the next financial year.
- Contains some forward-looking statements based on assumptions and expectations at the time of publication that are by nature subject to change. As such, the actions contemplated by these statements cannot be guaranteed nor relied on.



About us

During FY24, Altium operated as a public company listed on the Australian Securities Exchange (ASX). However, on 1 August 2024, we announced to the ASX the successful completion of the acquisition of our business by Renesas Electronics Corporation (Renesas). All the shares in Altium were acquired by Renesas and we subsequently delisted.

Our registered office is located in Chatswood, NSW, Australia and our global headquarters in San Diego, California, USA. This Statement is made on behalf of Altium as well as its subsidiaries. Please see [Appendix 1](#) for a list of our subsidiaries.

Altium creates innovative electronic design tools for our customers. Our tools are used in numerous industries including automotive, aerospace, defence, life-science, mobile devices, communications, consumer electronics, high-tech electronics, research, education, industrial controls automation, computers and semiconductors.

Our vision is to become the dominant provider of electronic design tools for the PCB design industry and to transform how electronics products are designed.

As at 30 June 2024, Altium had operations in 18 countries: Australia, Canada, China, Finland, Germany, India, Japan, Netherlands, Poland, Portugal, Serbia, South Korea, Sweden, Switzerland, Ukraine, United Kingdom, United States and Vietnam.

Governance and decision making in relation to our operations and related supply chain management is undertaken across our business in accordance with a single set of policies and procedures.

¹Our obligation under the Australian Modern Slavery Act 2018

Altium has eight core values that continue to drive us toward our vision:



Governance framework

Altium's codes and policies that underpin our anti-modern slavery program are described below. All Altium subsidiaries are required to abide by these codes and policies. These codes and policies are publicly available from the [corporate governance](#) section of Altium's website.

Corporate governance

As a listed company Altium supported the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations. Altium's Corporate [Governance Statement 2023](#) described our corporate governance policies and practices. Our corporate governance standards are now informed by subsidiary governance frameworks applicable to Renesas Group entities. As we have previously, we continue to review our practices, considering current and emerging corporate governance and regulatory developments relevant to Altium, and now Renesas. We adopt changes as appropriate and recommended.

During FY24, we permanently constituted Altium's Modern Slavery Working Group (Working Group) as a body of relevant persons across the business charged with overseeing our program of anti-modern slavery initiatives and promoting anti-modern slavery within our workforce.

Acting lawfully, ethically and responsibly

Altium encourages a culture of acting lawfully, ethically and responsibly across the organisation. Our [Code of Conduct](#) (Code) outlines the ethical standards expected of Altium directors, employees and representatives. It provides a framework to address any ethical issues that may arise in our business. Our [Anti-Bribery and Corruption Policy](#) prohibits Altium directors, employees and representatives from giving or receiving gifts that may compromise their integrity and objectivity or may create a conflict of interest.

Observing human rights

For our direct workforce, we continue to use measures to support fair labour practices and ensure that we operate respectfully and provide a safe work environment for our employees globally. We are committed to treating all employees with respect and in compliance with our [Human Rights Policy](#). The policy mandates fair and adequate working conditions for our people, including wages and hours, and encourages them to report actual or suspected violations of human rights to our Human Resources team. We strictly prohibit the use of slavery, forced labour and human trafficking. Our hiring practices are aligned with local labour and employment laws in all jurisdictions where we conduct our business. Any person who applies for employment at Altium does so on a voluntary basis and all employees are legally entitled to leave upon reasonable notice without penalty.

Whistleblower Protection

Altium's values and Code are designed to promote and support a culture of honest and ethical behaviour including encouraging a "Speak Up" culture. Our [Whistleblower Policy](#) encourages the reporting of any actual or suspected conduct within the Altium Group which may be unethical, illegal, fraudulent or undesirable. This includes conduct by an Altium director, officer, employee, contractor, supplier or other person who has dealings with Altium.

The Whistleblower Policy provides protections and measures to ensure any person making a report may do so confidentially (or anonymously) without fear of intimidation, disadvantage or reprisal. Appropriate internal and external channels have been put in place with the objective that any reports of wrongdoing are handled fairly, sensitively and confidentially.

This includes the provision of the Altium Whistleblower Service, an independent and external whistleblower service managed by Deloitte.

The Altium Whistleblower Service has a dedicated website, email address, fax number, postal address and confidential phone line.

Supplier standards

Altium's [Supplier of Conduct Code](#) (Supplier Code) sets out the behaviours and business practices expected of any entities or individuals supplying goods or services to Altium. Where suppliers operate in countries that have requirements and standards less stringent than Altium's Supplier Code, suppliers are expected to adhere to our Supplier Code.

We expect our suppliers to comply with local, national and international applicable laws including but not limited to anti-bribery and corruption, competition, business licensing, data protection and privacy, environment, export control, health and safety and labour laws. The Supplier Code was introduced in 2022 and continues to be annually reviewed.

We promote responsible procurement and are seeking to facilitate the creation of a secure, efficient, and ethical electronic fabrication and assembly value chain that is both less vulnerable and more resilient to disruption.

Certain products and services that Altium procures, such as software, are unique in nature. This may mean that we have limited leverage or opportunity for influence on those suppliers, and limited ability to source alternative essential supplies.

Where a supplier does not acknowledge the terms of our Supplier Code, we request a copy of the supplier's Code of Conduct or equivalent disclosures to confirm that the supplier upholds or is committed to anti-modern slavery protections that are as stringent as those set out in Altium's Supplier Code. We reserve the right not to mandate a supplier or to conduct further diligence where we are not satisfied that anti-modern slavery protections are sufficiently evident.

Further information on actions we have taken to assess and address modern slavery risks in our supply chain and how our Supplier Code operates in practice can be found below.

Altium’s operations and supply chain

Our operations

Altium operates two unique business units, which are complementary and synergistic: Design Software and Cloud Platform. These are our two growth engines for dominance and transformation with four associated flywheels to increase the rate of growth: design tool adoption, design platform adoption, cloud adoption and ecosystem adoption.

- 1. Our Design Software unit centers around our flagship product, Altium Designer, and Enterprise, which provides PCB design solutions and indirectly enhances the value of Altium 365 through the subscriptions associated with the PCB design tools.
- 2. Our Cloud Platform unit, including Altium 365, Nexar and Octopart, provides professionals and industry partners access to a vast ecosystem of electronic design and manufacturing users and customers. Nexar includes Octopart and manufacturing.



More information about Altium’s operations can be found [on our website](#).

Our people

Altium has a highly skilled and professional workforce in a mix of direct and indirect engagements. At 30 June 2024, the vast majority of our workforce were directly employed, most commonly in technology roles. In addition to our direct workforce, we also have an indirect workforce of contractors, primarily in technology, research and development, finance and compliance roles.

Direct employment of workers	Altium employs people in our offices around the world
The provision and delivery of products or services	<ul style="list-style-type: none">• Development and testing of PCB design software• Development of cloud platforms• Octopart search engine for sourcing electronic parts• Selling PCB design software and cloud platforms• Providing Altium Education and Training Programs• Manufacturing customised computer hardware through Gumstix
Distribution, purchasing, marketing and sales	<p>Marketing Altium products and programs</p> <p>Network of channel partners, including authorised value-added resellers who have been trained and certified in Altium products</p>

Figure 1. Overview of Altium’s operations

Our supply chain

The supply of goods and services to Altium centres around supporting the creation and enhancement of our design software and operating and continually innovating our cloud platform. To support this, Altium's supply chain has historically focused on office and administrative support services and technology-related goods and services.

Altium also has a limited manufacturing supply chain through Gumstix, our PCB contract manufacturing business unit.

In simplest terms, our supply chain includes:

<div>▾</div> <div>Products</div> <div>Products purchased by Altium to support our operations and activities</div>	<div>▾</div> <div>Services</div> <div>Services purchased by Altium to support our operations and activities</div>	<div>▾</div> <div>Indirect supply chain</div> <div>Products and services purchased by Altium's suppliers, and their suppliers</div>
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Figure 2. Altium's supply chain

Procurement at Altium

Altium has a centralised software and service procurement and sourcing system which is managed by Altium's Operations team. That team is responsible for software and services and its lifecycle management which represents a significant proportion of Altium's spend on suppliers. The team collaborates with stakeholders throughout Altium and vendors to provide the latter with a copy of our Supplier Code with which we expect our vendors to comply. As part of the Modern Slavery (Roadmap) developed during the year ending 30June 2023 (FY23) we aim to continuously improve our procurement practices. During FY24, while some location specific sourcing and procurement occurred at a regional operational level, Altium channeled most of our compliance and contract review processes through our dedicated Procurement Lead based at our Head Office in California.

The main types of goods sourced from our suppliers are:

Information technology	Information technology software, hardware (e.g. computers, mobile phones), software, systems and network infrastructure and IT related services
Office location goods	Office supplies, furniture, capital improvements, marketing collateral and other equipment
Small scale manufacturing goods	Small scale contract manufacturing of customised computer hardware for Altium's Gumstix operations

The main types of services procured from our suppliers are:

Information technology	<ul style="list-style-type: none">• Information and communications technology services and utilities• Cloud and web-hosting services• Marketing (primarily web advertising), trade shows and field services
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Office location services	<ul style="list-style-type: none">• Facilities and property management services, including office rent, printing and office services, car-parking, utilities, cleaning and security• Office moving and relocation services• Repairs and maintenance• Transportation, postage, freight and couriers
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Professional services	<ul style="list-style-type: none">• Compliance, sustainability, accounting, legal, financial, insurance, training, payroll, recruitment and tax services
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Travel and hospitality	<ul style="list-style-type: none">• Travel and accommodation• Hospitality and catering services
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Modern slavery risks in our operations and supply chain

In FY23, Altium engaged a recognised sustainability advisory firm to conduct a detailed Modern Slavery Risk Assessment (Assessment) across both our operations and supply chain as defined by the Australian Modern Slavery Act Guidance for Reporting Entities.

In our Assessment, “risk” referred to the statutory definition of risk, which considers modern slavery risk in terms of risk to people experiencing harm, as opposed to risk to the business. Altium’s comprehensive review of our approach to modern slavery risk included analysis of spend data, qualitative review of documentation with suppliers and extensive stakeholder engagement.

The Assessment methodology drew on reputable data sources, such as the Global Slavery Index (Walk Free Foundation), Global Rights Index (International Trade Union Confederation), Trafficking in Persons Report (US Department of Labor) and commodity research by Verite. It considered inherent risk factors, which are evidenced by modern slavery prevalence in a particular industry, product, country, or region. These factors were mapped against key features of our operations and supply chains. The three key risk factors that contributed to our assessment were:

1. Product or service risk
2. Industry risk
3. Geographic risk

The Assessment identified the potential for high-risk modern slavery practices, however it did not identify that specific modern slavery risks exist in our operations or value chain, nor that there had been breaches of statutory requirements relating to modern slavery. To the best of our knowledge and after making reasonable enquiry across our business, with our customers and in our supply chain, this remained the case through FY24.

The Assessment was intended to inform and is informing our ongoing risk-based approach to combating modern slavery and led to the development of our Roadmap, underpinning our future action to address modern slavery risk. Our Working Group, which we permanently constituted as part of the Roadmap, has overseen actions arising from the Assessment and Roadmap during the year.

Risks in our operations

The Assessment involved an analysis of our operations in those jurisdictions in which we operate or have operated.

Analysis found that modern slavery risks prevalent in software businesses often occur in software development, contracted site services for repair and maintenance as well as cleaning, hospitality, logistics, transport services. Modern slavery risks prevalent in software businesses may also be attributable to the inherent risk of a geographic location.

No actual or suspected breaches of modern slavery laws within our business were identified as part of the Assessment and following our own reasonable enquiries we believe that this has remained the case in FY24. However, a continued understanding of potential risk areas enables us to more comprehensively address potential modern slavery risk in our operations and supply chain and identify higher risk geographies and sectors. We recognise that addressing modern slavery requires ongoing vigilance whereby the processes and procedures we utilise to protect against it are continually examined and revised.

Risks in our supply chain

A large proportion of Altium’s FY24 supplier spend occurred within developed economies with our largest 3 geographies by spend continuing to be the United States (68%), Australia (17%) and Germany (4%). These nations exhibit a low prevalence of modern slavery, and their governments take robust actions against it. As in FY23, it continues to be the case that less than 10% of Altium’s sourcing originates in countries with a medium to high risk of modern slavery.

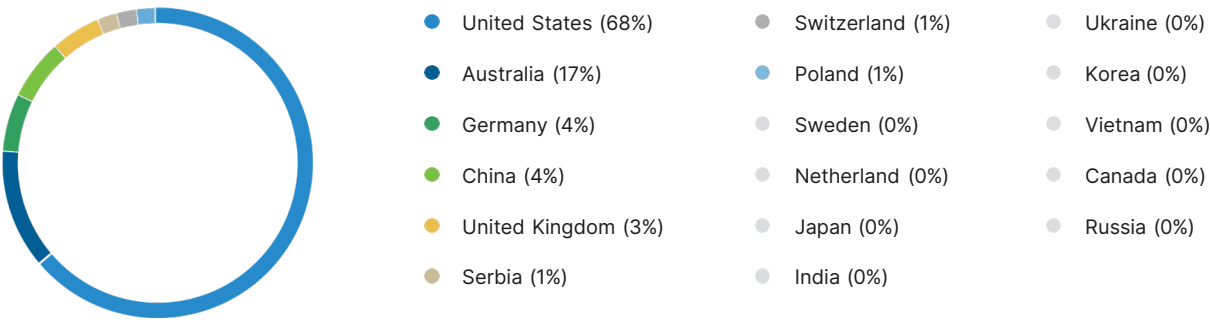


Figure 3. Geographic spend across Altium’s supply chain (as a percentage of total FY24 spend)*

*Note that this data refers to the country of transaction rather than the country of origin of the goods and services.

The analysis found that modern slavery risks prevalent in software business supply chains often occur in software development, cleaning services, web services and electronic goods, hardware and IT equipment. However, from the evidence available, no actual or suspected breaches of the law were identified in our procurement of these goods and services from our suppliers.

Initiatives to understand and manage our modern slavery risks

This section describes those initiatives we have adopted to assess and address modern slavery risks.

Comprehensive risk assessment

As previously noted, in FY23 Altium engaged an expert advisor to conduct an Assessment of our operations and supply chains. This involved an analysis of our supplier spend data by spend category and geography as well as an assessment of our operational footprint in high- risk geographies and industries.

Gap analysis

In FY23, the same expert advisor conducted a Modern Slavery Gap Analysis (Gap Analysis). This involved assessing Altium's current processes and systems to address modern slavery risk and meet the requirements of modern slavery laws which apply to us.

The review considered Altium's current practices against five key criteria (depicted in Figure 4) and was based on Australian Government Guidance for Reporting Entities, United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles), the Ethical Trade Initiative, International Labour Organisation outputs, as well as relevant industry reports and market practice examples.



Figure 4. The five criteria assessed to address modern slavery risk

Roadmap of priorities

Following the issue of the Assessment and the Analysis, our Roadmap was developed. The Roadmap is forward looking and lays the foundations for implementation of a practical action plan to identify and mitigate the risks associated with modern slavery. It describes our objectives to combat modern slavery risk and also outlines remediation plans to be adopted where we identify risks within our supply chain.

In FY24 we commenced implementation of our Roadmap and its related, multi-year action plan.

FY24 Actions

Supplier due diligence and procurement process enhancements

Altium continued to review and seek to improve its software service procurement and associated sourcing processes with the aim of increasing centralisation of relevant processes and procurement to our Operations team (described in 'Procurement at Altium' above). This particularly included driving the acceptance of the terms in our Supplier Code by our suppliers. Recognising that we inherently lack complete visibility into the extended supply chains of our suppliers we continue to believe that risk-based centralisation of our processes will help enhance transparency in our supply chain and workforce.

In FY24, further actions were taken to centralise our vendor compliance and management. Our ongoing optimisation and integration of relevant systems in this respect has been central to efforts to better understand our customers and suppliers and therefore more meaningfully manage our anti-modern slavery due diligence. In future, we expect that the enhanced connection of our procurement and sales systems will give us the ability to capture and interrogate relevant and richer data relevant to the mitigation of modern slavery risk in our business. A rationalisation of our vendor numbers is also anticipated to ensure that we better know a smaller number of suppliers.



Governance and planning

During FY24, Altium constituted the Working Group. The Working Group was chaired by a member of our Management Team and include representatives from our Legal, Finance, Operations, Procurement and Human Resources teams across multiple countries. We recognise that our ability to manage modern slavery risk will be shared across our business globally and representation of a true cross-section of Altium's world-wide workforce on the Working Group reflects this.

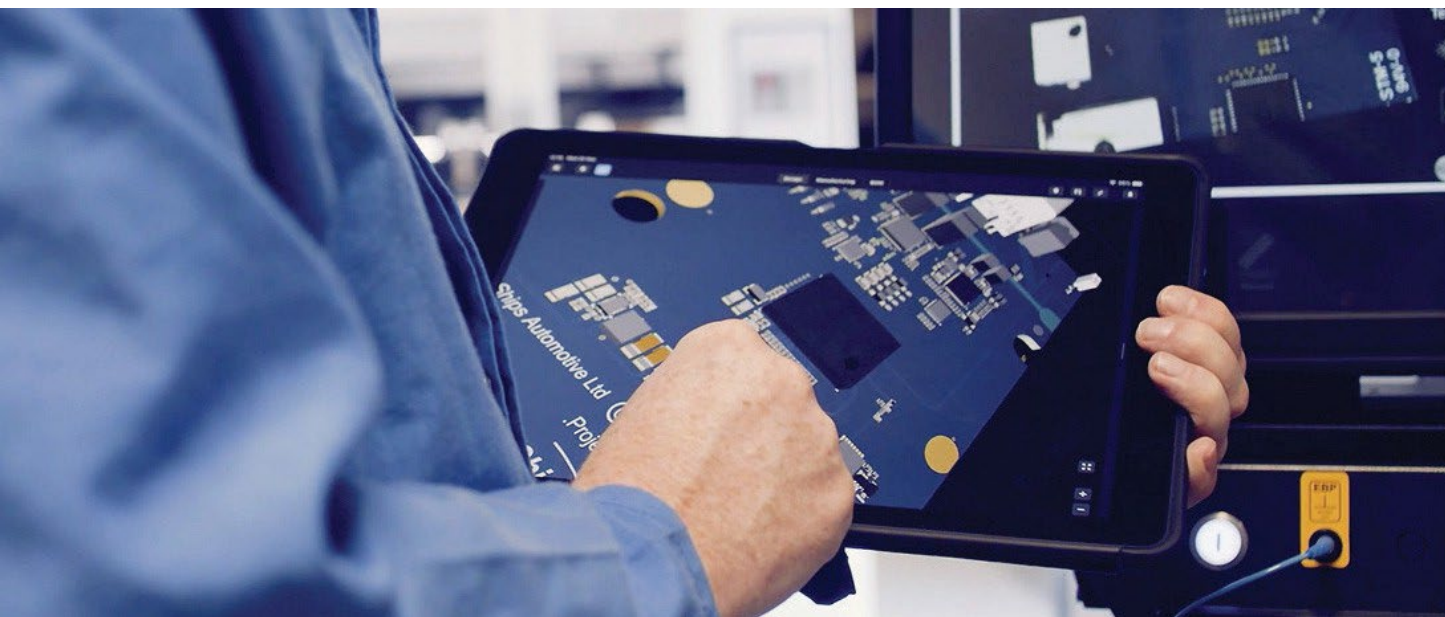
Enhancing training and awareness

Altium is committed to the broader education of our entire workforce on issues of modern slavery and human rights and training is an important enabler. In FY23 we started the Modern Slavery training series contemplated by our Roadmap, introducing a general training module - "Protecting Human Rights" - which was made available to our entire workforce in Skillsoft (Altium's online training resource). In FY24, a new training module was added to our series - "Compliance Short: Combating Modern Slavery". More specific to the electronics industry, this module considers scenarios of modern slavery risk.

Assessing the effectiveness of our actions

In FY24 we have continued implementation of the Roadmap informed by key recommendations and findings of the Assessment and Gap Analysis. Noting our intended actions outlined in FY23, this has included:

- Formally constituting our Working Group to drive actions in support of our Roadmap;
- Further centralising global procurement activity and related risk management with system improvements designed to better oversee a wider breadth of global suppliers;
- Continuing to drive adoption of Altium's Supplier Code across our supply chain, imbedding relevant processes in our onboarding of new suppliers and seeking to conduct enhanced supplier due diligence where any red flag non-compliance is identified or suspected; and
- Enhancing training for our people to understand specific issues of modern slavery more prevalent in our industry.



Our future

The Roadmap will be integrated with Renesas' sustainability practices and our processes will be embedded within our new global organisational structure and presence. Renesas has a dedicated Sustainability Promotion Office (SPO), and Renesas' experience and resources will be applied to the Roadmap to ensure that we continue to diligence our modern slavery risks and elevate our responsiveness to risks.

More information about Renesas' Sustainability, including regular sustainability updates can be found here: [Sustainability | Renesas](#)

We look forward to providing progress reports on the implementation and results of our actions and anti-modern slavery objectives in future reporting periods.

Approval

This Statement was approved by the Board of Altium Limited on 12 December 2024.

A handwritten signature in black ink that reads "Natasha Davidson". The script is cursive and fluid.

Natasha Davidson

Executive Director

Appendix 1

Altium entities at 30 June 2024

NAME	PRINCIPAL PLACE OF BUSINESS /COUNTRY OF INCORPORATION	OWNERSHIP INTEREST	
		2024 %	2023 %
Altium BV	Netherlands	100%	100%
Altium d.o.o Beograd Novi Beograd	Serbia	100%	100%
Altium Holdings Canada Inc.	Canada	100%	100%
Altium Europe GmbH	Germany	100%	100%
Altium Inc.	USA	100%	100%
Altium Information Technology (Shanghai) Co. Ltd	China	100%	100%
Altium Insurance Inc.	USA	100%	100%
Altium IP Co Pty Ltd	Australia	100%	100%
Altium IP Hold Co Pty Ltd	Australia	100%	100%
Altium Japan KK	Japan	100%	100%
Altium Limited Korea Branch ¹	Korea	100%	100%
Altium LLC	USA	100%	100%
Altium Netherlands BV	Netherlands	100%	100%
Altium Poland Sp.z.o.o	Poland	100%	100%
Altium Software India Private Limited	India	100%	100%
Altium Sweden AB	Sweden	100%	100%
Altium UK Limited	United Kingdom	100%	100%
Altium Vietnam Company Limited	Vietnam	100%	100%
Ciiva GmbH	Switzerland	100%	100%
Gumstix Inc.	USA	100%	100%
Gumstix Research (Canada) Ltd	Canada	100%	100%
Morfik Technology Pty Ltd	Australia	100%	100%
Octopart Inc.	USA	100%	100%
PCB:NG Inc.	USA	100%	100%
Perception Software Inc.	USA	100%	100%
Protel AG	Switzerland	100%	100%
Tasking US LLC	USA	100%	100%
Valispace GmbH ²	Germany	100%	0%
Galactic Purpose Unipessoal LDA ²	Portugal	100%	0%

¹Altium Limited Korea Branch was incorporated on 23 December 2022

²Valispace GmbH and Galactic Purpose Unipessoal LDA were acquired on 21 December 2023.