



## SUPPLIER CODE OF CONDUCT

Altium Packaging ("Altium") is committed to operating with high ethical standards in all dealings with employees, customers, suppliers, competitors and the communities in which we operate. Our stakeholders expect Altium to uphold high standards of responsible and ethical behavior and encourage a similar commitment by companies with which we do business.

As with our approach in our own interactions, we expect our suppliers, vendors, contractors and service providers ("Suppliers") to operate in a manner consistent with our Guiding Principles, which can be found on our website (<https://altiumpkg.com/why-altium/our-guiding-principles/>). This Supplier Code of Conduct ("Code") sets forth Altium's additional expectations with respect to key areas of corporate responsibility.

### **Environmental & Safety**

Altium is committed to supporting sustainable practices. Suppliers must comply with all applicable environmental laws and regulations in the jurisdictions where they operate and should strive to conduct their operations in a way that conserves natural resources.

#### **Health & Safety**

Suppliers shall keep the work environment free from recognized hazards and comply with all applicable laws regarding working conditions (e.g., worker health and safety, sanitation, fire safety, electrical, mechanical and structural safety, etc.).

#### **Environment**

Altium is constantly striving to expand the field of sustainable packaging options for our customers, and we seek Suppliers that share that same commitment. Suppliers must meet all applicable environmental laws in the locations where they do business. In addition, Suppliers should consistently look for new and better ways to conserve resources and reduce manufacturing waste.

#### **Product Safety**

Altium is committed to providing products that meet applicable regulatory specifications and quality standards. All products or raw materials that Supplier sells to Altium shall be safe for their intended uses.

### **Social**

Social responsibility requires companies to act in the best interests of society as a whole and the communities in which they operate. Altium encourages Suppliers and their employees to get involved in their communities by volunteering time and/or providing other types of support.

#### **Child Labor / Forced Labor / Human Trafficking**

Suppliers must not use child or forced labor in the production or distribution of their goods or services and are expected to take reasonable steps to ensure their suppliers do not use child or forced labor either. Suppliers shall adhere to the minimum employment legal age limit in the jurisdictions in which they operate.

Suppliers must not use or benefit from any form of forced labor, including indentured, bonded or slave labor, or human trafficking. Suppliers shall only use workers who have a legal right to work.

#### **Wages and Working Hours**

Suppliers' employees must receive compensation and benefits that comply with applicable laws regarding wages and hours worked.

#### **Political activities / Freedom of Association**

Altium does not adopt a political party position and expects Suppliers to respect the individual right of workers regarding their political convictions and union involvement. Suppliers must acknowledge the freedom of association of their workers and respect any applicable laws and collective bargaining instruments.

#### **Harassment / Non-Discrimination**

Suppliers should treat their employees with respect and dignity and promote an environment that is free from discrimination, harassment or physical punishment. Employment practices must be based solely on the person's skills, abilities and qualifications and not personal characteristics, including any characteristics protected by applicable laws.

## **Governance**

We work every day to develop and maintain trusted relationships with our stakeholders. Suppliers are expected to develop and apply appropriate internal controls, accountability and governance models that ensure accurate reporting, encourage financial stability and transparency in the supply chain.

### **Business Practices / Antitrust/Competition**

Suppliers must conduct their business in a fair and ethical manner and must comply with all applicable laws pertaining to antitrust and competition. Suppliers shall not engage in collusive bidding, price fixing or other unfair trade practices. Suppliers must avoid conflicts of interest in their business dealings and operate with full transparency with respect to any circumstances where a conflict does, or may, arise.

### **Anti-Corruption**

Altium is committed to conducting business legally and ethically and will not tolerate corruption in any form. Suppliers must comply with all applicable anti-corruption laws and must not engage in any form of corrupt practices including extortion, fraud, impersonation, false declarations, bribery, money laundering, supporting or involvement with terrorist or organized crime organizations or activities. Suppliers must not offer bribes, kickbacks, gifts, illegal political contributions or other items of value to any government official or third party with the intention of obtaining or retaining an improper business advantage.

Suppliers are prohibited from providing or offering gifts to Altium employees that could inappropriately influence Altium's decisions or gain an unfair advantage.

### **Anti-Boycott and Export Control Laws / Trade Sanctions**

Suppliers must implement measures to secure our international supply chain by complying with all applicable customs, anti-terrorism, import/export control, anti-boycott laws and any government-imposed trade sanctions that apply to their business activities.

### **Traceability**

Altium supports responsible sourcing practices, which includes transparency and traceability. Altium encourages Suppliers to conduct supply chain mapping to enable Altium to support its customers in assessing the upstream supply chain of the products Altium manufactures.

### **Diversity and Small Business Subcontracting**

Altium seeks to contribute to the economic growth of a diverse business community. Suppliers are encouraged to develop relationships with qualified, diverse businesses, including minority-owned businesses, women-owned businesses, small disadvantaged businesses, and other such businesses that meet our high standards for quality and cost effectiveness.

### **Information Security**

Suppliers that handle Altium company data are expected to have internal information security and/or data privacy practices appropriate to the size and complexity of the supplier's business to protect Altium's company data and comply with applicable privacy laws (e.g., data breach notification processes, effectiveness testing, external audits, etc.).

### **Third-Party Suppliers**

We expect Suppliers to be accountable for managing risk in their operations and hold their own suppliers accountable to the same high standards. This includes contract and seasonal workers and temporary agencies.

## **Non-Compliance**

Any reports of non-compliance with this Code should be directed (anonymously, if desired) to the Altium Ethics Hotline which is run by an independent third-party and is available 24 hours a day, 7 days a week:

**Ethics Website:** [altiumpkg.ethicspoint.com](http://altiumpkg.ethicspoint.com)

**Toll-free Ethics Hotline:** 1-(866)-ALTIUM1

We expect our Suppliers to develop and implement appropriate internal business processes to operate in a manner consistent with this Code. Suppliers must be able to demonstrate compliance with this Code at the request and to the satisfaction of Altium.

