



Policy Against Trafficking of Persons and Slavery

Purpose

Alphawave IP is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labour and unlawful child labour. Alphawave will not tolerate or condone human trafficking or slavery in any part of our global organization. This policy is consistent with Alphawave's Code of Ethics and Business Conduct and our core values to protect and advance human dignity and human rights in our global business practices.

Alphawave employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Alphawave conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

Scope

This Policy applies to all personnel employed by or engaged to provide services to Alphawave IP, including, but not limited to, Alphawave's employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this Policy, "employees").

Every Alphawave employee is responsible for reading, understanding and complying with this Policy.

Alphawave managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them. If you have any questions or concerns relating to this Policy, consult the Alphawave Legal Department or a member of the HR team. If you learn of any conduct that you believe may violate this Policy, report it immediately.

Policy statement

Alphawave prohibits trafficking of persons and slavery. Alphawave employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Alphawave conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking of a persons;
- Procuring commercial sex acts;
- Using forced labour in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/ contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided by Alphawave), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labour laws of the country in which the recruiting takes place;
 - Charging applicants/candidates recruitment fees;
 - If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;



- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

Employees must carry out appropriate due diligence before engaging a contractor, supplier or other third party, in accordance with the Alphawave Anti-Money Laundering Policy.

Investigations and audits

Alphawave may perform investigations and audits to verify that business is being conducted in compliance with this Policy. All Alphawave employees and third parties through whom Alphawave conducts business are required to fully and promptly cooperate with Alphawave’s internal and external auditors and investigators, and must respond fully and truthfully to their questions, requests for information, and documents. Any failure by an employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting email or other documents, may be grounds for disciplinary action, up to and including termination, subject to applicable law.

Policy compliance

Report any conduct that you believe to be a violation of this Policy, either directly to a member of the HR team or to the Alphawave Legal Department.

Reports may also be made through the Alphawave’s Whistle Blower hotline, details of which can be found in the Whistleblowing Policy. Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy as permitted by applicable law.

Alphawave will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

Document Version Control

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