

ESG Policy

Purpose

The purpose of this policy is to establish our overall approach to ESG, including the identification, assessment, management, and reporting of relevant ESG to ensure compliance with all applicable regulations.

Policy statement

The Company seeks to ensure that it conducts its business activity in a socially responsible manner. In conjunction with this policy, it aims to embed sustainable and responsible practices into the way its employees act internally and engage externally in order to preserve and create long-term value for a wide range of stakeholders. For this purpose, it aims to adopt a number of ESG initiatives and KPIs which will be reported to the Board on a regular basis. Active participation and engagement at all levels of the organisation is of vital importance to ensure ownership of ESG activities. The Company will ensure that this policy is reviewed and updated, if necessary, at least annually.

ESG Commitment: Alphawave seeks to conduct all of its business in an honest and ethical manner. The Company is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates.

This commitment informs every aspect of our business, including how we design our technology, operate internally, collaborate with a wide range of stakeholders, and report progress.

Our culture and business practices have been informed by our four core values – Technology focused, Open and honest, Diverse, Entrepreneurial and dynamic. These guiding principles that we stand for collectively and individually, are at the heart of our purpose as a responsible business.

We will uphold all laws relevant to ESG topics in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the non-financial reporting requirements in sections 414CA and 414CB of the Companies Act 2006, and we are aligning our ESG reporting with the recommendation of the TCFD and SASB.

ESG Goals

We contribute to society mainly by fighting exclusion and promoting diversity, fostering the next wave of innovators and playing an active role in reducing our carbon footprint. We do this both through our own activities and in collaboration with our customers and other stakeholders, for shared success.

The business has not yet conducted its first materiality assessment. However, we already identified the following seven material ESG priorities that have significant positive impacts on our value drivers, as well as for our stakeholders.

Environment:

- Committed to carbon neutrality
- Contribute to the decarbonisation of the digital infrastructure with our technology and products
- Contribute towards a responsible supply chain

Social:

- Invest in the development of talent and foster the new generation of innovators
- Promote a diverse and inclusive working environment
- Play a positive role in the communities where we operate

Governance:

- Maintain highest standards of corporate governance
- Acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates.

ESG Governance

The Board of Directors has ultimate responsibility for governance of the Company, including ESG. The ESG Steering Committee oversees our overall approach for material ESG topics ensuring ESG activities are aligned to the Company's strategy and goals, and is led by the Executive Chair. The Committee meets quarterly to review the overall approach/strategy, set goals, budgets, implementation of timelines, monitors overall progress and results.

The ESG Steering Committee is comprised of representatives of human resources, company secretary, risk management, investor relations and supply chain. The ESG Steering Committee is also responsible for the coordination of the ESG activities, ensuring they are aligned with the Company's strategies and goals and is responsible for reporting to the Board.

Where sustainability management performance issues are of sufficient importance, responsible departments will report these directly to the Board on an ad hoc basis.

Engagement with stakeholders. Our ongoing engagement with internal and external stakeholders helps us understand the impact of our activities and relationships on others. In addition, how we can best manage these impacts in a responsible manner, as well as the potential risks and opportunities. This supports our ability to create value for all our stakeholders.

Focus on material impacts. The Company aims to undertake an annual materiality assessment of ESG areas, engaging a third party to identify material ESG topics through interviews with internal stakeholders. On a bi-annual basis or earlier if necessary, the materiality assessment process will also include the views of external stakeholders. Alphawave believes this is the right approach for a company of our size which operates in the high-end of digital infrastructure markets and at the forefront of technology in a business-to-business market with long-product cycles.

Scope**Who is covered by the policy?**

This policy applies to all Alphawave employees (whether permanent, fixed-term or temporary), including senior managers, officers, directors, consultants, contractors, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, direct suppliers, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and while not an exhaustive list includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

The goal of the ESG policy is not to set all relevant policies applicable across the organisation, but to ensure that the Company sets adequate ESG goals, and that all ESG activities and policies are aligned to the Company's strategy and goals.

Environment

The Board has overall accountability for the management of risks and opportunities, including assessment of risks associated with climate change.

The Company has committed to achieving carbon neutrality, mostly through the offset of GHG emissions in the short term. Although as a fabless business our environmental impact is relatively low, the Company is actively putting measures in place towards reducing its carbon footprint, such as investing in efficient and sustainable premises or carefully considering corporate travel.

Additionally, the Company is aiming to fully align its reporting with the recommendations of the TCFD.

The ESG Steering Committee will review the environmental reporting of the Company and consider any changes when appropriate, as well as considering other relevant reporting standards or frameworks.

Social

A deep commitment to social responsibility is core to who we are as a Company. We believe people are at the heart of our business and take pride in our work culture. We embrace diversity in all its forms and respect internationally recognised human rights.

Responsibility for the area of social and people sits with the Vice President Human Resources and is supported in this role by dedicated Human Resources teams.

To support this commitment, the Company has the following policies in place:

- Code of Ethic and Business Conduct
- Equal opportunities and Dignity at Work Policy
- Right to Disconnect Policy
- Workplace Violence and Harassment
- Alphawave Accessibility Plan

Alphawave IP is committed to publish its Modern Slavery Statement and Gender Pay Gap report (even though it is not currently a legal requirement for Alphawave IP).

The Company has in place a community engagement programme which is co-ordinated by local representatives who meet remotely twice a year to share experiences and co-ordinate group-wide initiatives. Responsibility at Group level sits with our Senior Facilities Specialist in the Human Resources Function.

Governance

The Board is firmly committed to the highest standards and although the Company has a standard listing, it intends to continue to comply with the requirements of the UK Code 2018. The Board will also continue to report on its compliance with the Code in accordance with the requirements for premium listed companies under the Listing Rules.

Our Corporate Governance framework is reflected in the chart below which is published in our annual

report.



The Company has the following relevant policies in place:

- Anti Bribery Policy
- Anti Fraud and Dishonesty Policy
- Anti Money Laundering Policy
- Whistle Blowing Policy

The Company Secretary will work closely with the Board to ensure that its decision making includes consideration of the ESG priorities.

Training and communication

Training on this policy forms part of the induction process for all new employees, when relevant to their roles.

Who is responsible for the policy?

The Board, along with the ESG Steering Committee have overall responsibility for ensuring this policy complies with our legal and ESG commitments and that it is aligned with the Company's strategy and

goals. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Monitoring and review

The ESG Steering Committee will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as reasonably possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

Employees are invited to comment on this policy and suggest ways in which it can be improved to the Global Head of Investor Relations.

Document Version Control

Version	Date Drafted	Drafted by	Reviewed by	Date Reviewed	Next Review date
V.DRAFT	Sep-22	Jose Cano		Feb-23	Jan-24