

Electronic Monitoring Policy

Scope

This Policy applies to all personnel employed by, or engaged to provide services to, Alphawave IP Group PLC (**referenced as Alphawave Semi/Alphawave/the Company*) or any of its subsidiaries (collectively, “Alphawave”), including, but not limited to, Alphawave’s directors, employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this Policy, “employees”), unless an alternative, entity-specific policy covering the same subject matter is adopted for a specific subsidiary.

Definition

Electronic monitoring - Using electronic means to observe, record, track, or collect data on employees (including but not limited to employee performance, location, and resource use), where such data may be accessed and reviewed by Alphawave Semi, or someone acting on its behalf.

Policy

The company engages in the electronic monitoring of employees including as follows:

- The company’s electronic resources (networks, servers, platforms/apps, e-mail, etc.) automatically and continuously collect data on usage;
- the company continuously monitors building access by using electronic pass cards; and
- reception and lab areas of the company’s premises are subject to continuous video surveillance.

Collected data may be reviewed and used as needed, for purposes including security, data security, legal, investigational, operational, and performance management reasons.

In certain situations, the company may engage in forms of electronic monitoring other than those outlined above, or for purposes not listed above. For example, the company may need to monitor other employee activities, including without advance notice, to comply with third-party obligations regarding data security in client contracts.

Greater legislated right prevails

If any applicable legislation confers a greater right or benefit than this policy with respect to the matters described herein, the legislation will apply.

Prohibited behaviour

Employees must not attempt to interfere with, circumvent, or otherwise misuse the electronic monitoring implemented by the company. Doing so will result in discipline, up to and including termination of employment (including for cause).

Document Version Control

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V.1.0	10-Oct-22	M. Jones	D. Aharoni	11-Oct-22	
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