

Workplace Violence, Harassment and Discrimination Policy

Overview

Alphawave IP Group PLC (**referenced as Alphawave Semi/Alphawave/the Company*) (together with its subsidiaries and/or affiliates), is committed to keeping its workplace free from Violence, Harassment and Discrimination for employees, directors, officers, and volunteers (e.g., contractors, consultants, service providers, agents, representatives or distributors), of the Company (collectively, “employees”). Furthermore, the Company recognizes the dignity and worth of every person and is committed to providing for equal rights and opportunities to employees without Violence, Harassment or Discrimination.

Purpose and Scope of this Policy

The Company is committed to building and preserving a safe, productive and healthy working environment for its employees based on mutual respect. In pursuit of this goal, the Company will not tolerate acts of Violence, Harassment or Discrimination against, or by, any employee.

While employees are required to report incidents of Violence, Harassment or Discrimination, making a false report or complaint, or providing false information about a report or complaint is prohibited and is a violation of this Workplace Violence, Harassment and Discrimination Policy (“Policy”). Employees who violate this Policy are subject to disciplinary and/or corrective action, up to and including termination of employment.

The Policy is subject to other applicable legislation.

This Policy applies to all personnel employed by, or engaged to, provide services to Alphawave Semi 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.

Responsibilities of Employees

All employees must comply with this Policy and contribute to maintaining a workplace free from Violence, Harassment and Discrimination. All employees must treat other employees with dignity and respect, be cognizant of other employees’ perspectives and feelings and avoid any behaviour that could constitute Violence, Harassment or Discrimination. Furthermore, employees that are victims of, have witnessed, or have knowledge of Violence, Harassment or Discrimination, must report such behaviour to the Company in accordance with this Policy.

Over and above their responsibilities as employees of the Company, managers must be sensitive to the climate in the workplace and address potential problems before those problems become serious. If a manager becomes aware of Violence, Harassment or Discrimination, they must:

- Support the alleged victim without prejudging the situation;
- work with the alleged victim to document the Violence, Harassment and Discrimination; and
- contact Human Resources and provide details of the incident on behalf of the employee.

Definitions

Harassment

“Harassment” means:

- a) Engaging in a course of vexatious comment or conduct against an employee in a workplace that is known, or ought reasonably to be known, to be unwelcome;
- b) any inappropriate conduct or comment by a person towards a worker that the person knew, or reasonably ought to have known, would cause that worker to be humiliated or intimidated;
- c) bullying;
- d) sexual harassment, which means:
 - i. Engaging in a course of vexatious comment or conduct against an employee in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known, or ought reasonably to be known, to be unwelcome, or
 - ii. making a sexual solicitation, or advance, where the person making the solicitation, or advance, is in a position to confer, grant, or deny a benefit, or advancement to the employee and the person knows, or ought reasonably to know, that the solicitation, or advance, is unwelcome; or
- e) psychological harassment, which means any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects an employee’s dignity or psychological, or physical, integrity and that results in a harmful work environment for the employee. A single serious incidence of such behaviour that has a lasting harmful effect on an employee may also constitute psychological harassment.

A reasonable action taken by the Company, or supervisor relating to the management and direction of employees, or the workplace, is **not** workplace harassment.

Examples of conduct that may be Harassment include:

- Unwelcome remarks, jokes or innuendos about a person's racial or ethnic origin, colour, place of birth, citizenship or ancestry;
- displaying racist, derogatory, or sexually explicit pictures, or other offensive material;
- insulting gestures, or practical jokes, based on racial, or ethnic grounds, which create awkwardness or embarrassment;
- refusing to speak to, or work with, someone, or treating someone differently because of ethnic, or racial, background; and
- any behaviour, in the form of words, gestures, or actions, generally repeated, that has undesired sexual or racial connotations, that has a negative impact on a person’s dignity, or physical, or psychological integrity, or that results in the person being subjected to unfavourable working conditions.

Examples of conduct which may be Sexual Harassment include:

- An implied, or expressed threat of, reprisal for refusal to comply with a sexually oriented request;
- a demand for sexual favours in return for (continued) employment, or more favourable employment treatment;
- unwelcome remarks, jokes, innuendoes, propositions, or taunting about a person's body, attire, sex, or sexual orientation, and/or based on religion;
- suggestive or offensive remarks;
- bragging about sexual prowess;
- offensive jokes, or comments, of a sexual nature about an employee;
- unwelcome language related to gender;
- displaying of pornographic, or sexist, pictures or materials;
- leering (suggestive persistent staring); and
- physical contact such as touching, patting, or pinching, with an underlying sexual connotation.

Violence

“Violence” means:

- a) The exercise of physical force by a person against an employee, in a workplace, that causes or could cause injury to the employee.
- b) An attempt to exercise physical force against an employee, in a workplace, that could cause injury to the employee; or,
- c) a statement or behaviour that it is reasonable for an employee to interpret as a threat to exercise physical force against the employee, in a workplace, that could cause injury to the employee.

Examples of conduct which may be Violence include:

- Physical acts (e.g. hitting, shoving, pushing, kicking, sexual assault);
- any threat, behaviour or action that is interpreted to carry the potential to harm or endanger the safety of others, result in an act of aggression, or destroy or damage property; and
- disruptive behaviour that is not appropriate to the work environment (e.g. yelling, swearing).

Discrimination

“Discrimination” means treating anyone unequally on the basis of any prohibited ground under applicable human rights legislation, such as (but not limited to) race, ancestry, place of origin, colour, ethnic origin, language, political belief, citizenship, religion, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, pregnancy, family status, social condition, handicap, disability, political conviction, or because someone has been convicted of a criminal or summary conviction offence that is unrelated to the employment, or to the intended employment of that person.

Examples of conduct that may be Discrimination include:

- Refusing to hire someone on the basis of one of the prohibited grounds;
- failing to award a job or promotion to someone on the basis of one of the prohibited grounds; and
- excluding someone from a work-related event or activity on the basis of one of the prohibited grounds.

Procedure for Addressing Incidents of Violence and Domestic Abuse Violence

In the event of an incident of Violence, the following procedure should be followed:

1. If an employee believes that an incident of Violence has, or is likely to occur, they should summon immediate assistance by calling their local police department. This should also be done immediately in any case where someone has been injured, harmed or personal safety is at risk.
2. Proper First Aid measures should be immediately followed, where necessary.
3. Employees should be mindful of their personal safety and should not attempt to intervene in any act of Violence if to do so would put them or others at risk, other than to call their local police department.
4. Victims, witnesses, and people becoming aware of incidents of Violence should immediately report the incident in accordance with the procedures set out under the heading "Reporting Incidents of Violence, Harassment or Discrimination".
5. An investigation will be conducted into all incidents of Violence.
6. Incidents of physical assault may be reported to the police.

Domestic Abuse

Any employee who believes that domestic violence in the home could result in violence in the workplace and could expose the employee or another employee to physical injury, should report the matter to Human Resources. The Company recognizes and respects the sensitivity and confidential nature of such information. The Company is committed to reducing the risk of domestic violence occurring in the workplace, but needs the help of employees. Employees who believe that they are at risk of being subjected to domestic violence will be supported by Human Resources and will be provided with appropriate and confidential support.

Right to Refuse Unsafe Work

- If an employee has any health and safety concerns, or concerns related to Violence, they must bring them to the attention of their manager;
- if an employee refuses to work because of a Violence, their manager must be informed;
- if after an investigation into the incident of Violence, there is still reason to believe the employee could be in danger, the employee may be assigned to other reasonable work; and,
- no reprisals will be taken against any employee who acts in compliance with, or seeks protection under, the provisions of the *Occupational Health & Safety Act*.

Risk Assessment

The Company will conduct a risk assessment of the work environment to identify any issues related to potential Violence that may impact the Company's operation and will institute measures to control any identified risks to employee safety. This information will be provided to the Company's Joint Health & Safety Committee.

The risk assessment may include review of records and reports (e.g. security reports, employee incident reports, staff perception surveys, health and safety inspection reports, First Aid records, or other related records). A risk assessment will be performed as often as necessary to ensure this Policy continues to protect employees from Violence.

Reporting Incidents of Violence, Harassment or Discrimination

Informal Procedure

If the employee is a victim of Violence, Harassment or Discrimination, or has witnessed, or become aware of, an incident of Violence, Harassment or Discrimination, the employee should:

- Confront the person engaging in the Violence, Harassment or Discrimination (the “Wrongdoer”), personally or in writing, pointing out the unwelcome behaviour and requesting that it stop;
- report the incident of Violence, Harassment or Discrimination to the employee’s manager. If, however, the employee’s manager is the Wrongdoer, report the incident of Violence, Harassment or Discrimination to another manager; or,
- proceed in accordance with the formal procedure set out below.

If a manager becomes aware of an incident of Violence, Harassment or Discrimination, the manager must report that incident to Human Resources.

Formal Procedure

If an employee is a victim of Violence, Harassment or Discrimination, or have witnessed or become aware of an incident of Violence, Harassment or Discrimination and has attempted to resolve the issue through the informal procedure, or the informal procedure, is inappropriate or undesirable in the circumstances, the employee should make a formal complaint/report of Violence, Harassment or Discrimination by delivering it in writing to Human Resources. If Human Resources is involved in the Violence, Harassment or Discrimination, report the incident to a manager.

The employee’s complaint should include:

- The approximate date and time of each incident;
- the name of the person or persons involved in each incident;
- the name of any person or persons who witnessed each incident; and,
- a full description of what occurred in each incident.

Special Circumstances

Should an employee have a legal court order (e.g. restraining order, peace bond, etc.) against another individual, the employee is encouraged to notify his or her manager, and to supply a copy of that order to Human Resources. This will likely be required in instances where the employee feels that the aggressor may attempt to contact that employee at the Company in violation of the court order. Such information shall be kept confidential, subject to any disclosure required by law.

Investigating Incidents of Violence, Harassment or Discrimination

All incidents, complaints and/or reports of Violence, Harassment or Discrimination will be appropriately investigated by the Company in a timely manner.

While investigations will differ depending on the circumstances, they will typically include:

- Informing the alleged Wrongdoer of the complaint, report, or alleged incident of Violence, Harassment or Discrimination;
- interviewing the alleged victim, the alleged Wrongdoer, and any witnesses; and
- reviewing any documents or evidence that is relevant to the investigation (e.g. review of photographs, documents, text messages, emails, documents contained on company computers, etc.).

The Company reserves the right to:

- Retain external investigators or legal counsel at its discretion; or,
- place any employee involved in the alleged incident of Violence, Harassment or Discrimination on a paid leave pending the completion of the investigation.

While investigations will vary in length, the Company will provide an estimated timeline to the parties at the outset and will endeavour to complete the investigation in a timely manner.

All employees must take part in the investigation process if required by the Company. Further, any managers must be supportive of the process and accommodate the needs the investigators (whether internal or external to the Company).

Disciplinary Measures

If a complaint or report of Violence, Harassment or Discrimination made in good faith is found to be unsubstantiated, there will be no negative consequences for the complainant/reporter.

By contrast, where an allegation of Violence, Harassment or Discrimination is found to have been made in bad faith or with an ulterior motive, or where a false claim is lodged, appropriate disciplinary action will be taken against the reporting employee, up to and including termination of employment.

If an incident, complaint or report of Violence, Harassment or Discrimination is substantiated, appropriate disciplinary action will be taken against the Wrongdoer, up to and including termination of employment.

In cases where criminal charges have been laid or are pending, the Company will assist police agencies, attorneys, and courts to the fullest extent.

Confidentiality

Information obtained about an incident or complaint/report of Violence, Harassment or Discrimination, including identifying information about any individuals involved, will not be disclosed unless the disclosure is necessary for the purposes of investigating, or taking corrective action with respect to the incident or complaint, or is otherwise required by law.

Anyone involved in an investigation is required to keep any information regarding an investigation confidential and must not disclose such information to any other individual (within, or outside the Company), without written authorization from Human Resources. If an employee becomes aware of another employee discussing an investigation, they must report it immediately to Human Resources. Any employee that breaches the confidentiality required by this policy may be subject to disciplinary actions up to and including termination of employment.

Reporting to the Parties Involved

Following the conclusion of the investigation, the outcome of the investigation and resulting corrective action, if any, will be reported in writing to the alleged victim of Violence, Harassment or Discrimination and the alleged Wrongdoer.

Record Keeping

Documents relating to the investigation (such as notes and statements), will not be kept in the parties' personnel files, although they may be stored elsewhere if necessary for record-keeping purposes. The only information relating to such an investigation that will remain in the parties' personnel files, will be confirmation that an investigation was conducted, and the nature of its disposition.

Document Version Control

Version	Date Drafted	Drafted by	Reviewed by	Date Reviewed	Next Review date
V.1.0	May-22	M. Jones	D. Aharoni	May-22	May-23
V.1.2			M. Jones	May-23	May-24
V.1.3			M. Jones	May-24	May-25
V.1.4	Dec. 24	S. Barghash		Jan. 25	Dec. 25