



OPC ENERGY LTD

Human Rights Policy

December 2024

1. **General**

The ethical treatment of all individuals and respect for their human and employees rights are fundamental to the core values of OPC Energy (the “**Group**”).

This Global Human Rights Policy (“**Policy**”) outlines how the Group upholds its values. The Group takes its responsibility to respect human rights seriously and expects all employees, and business partners to ensure the protection of human rights. This Policy is the formalization of our commitment to uphold and respect human rights and the values they represent throughout our business.

All The Group’s employees and business partners who works on behalf of The Group must adhere to the following human rights principles in addition to The Group’s Code of Ethics and compliance policies. Non-Compliance with these principles can lead to disciplinary actions up to termination of employment or contract.

2. **Human Rights Principles**

Safe Working Conditions – the Group is dedicated to eliminating incidents related to Environment, Health and Safety, and ensuring compliance with all regulatory requirements by adopting a proactive approach that empowers employees to identify at-risk conditions and behaviours, learn from them, and take action to eliminate hazards and minimize risks.

A Culture of Respect – respect for human rights is founded on valuing every individual. Our goal is to foster a global culture of respect across the Group, that are rooted in our core values of care, teamwork, and responsibility. Our fundamental commitment is to do everything in our power to uphold and respect the rights of all those we engage with.

Employment is Freely Chosen – the Group prohibits compulsory labor including prison labor, bonded labor, military labor, slave labor, and human trafficking. The Group forbids the use of economic pressure on individuals to perform labor or maintain employment. The Group believes that all workers have the right to freely terminate their employment after any legally required notice.

No Inhumane Treatment -the Group prohibits the use of threats, physical or psychological violence, abuse, harassment, intimidation, or coercion in any form.

Transparency - all employees receive a written document of terms of employment in a language they can understand.

No Discrimination - the Group respects the right of the employees to be treated with respect and dignity and supports the provision of equal opportunities to all its employees and candidates for employment. The Group has a zero-tolerance policy for discrimination or harassment in any form against any person based on, including but not limited to, religion, race, ethnicity, nationality, gender, sexual orientation, age or disability.

No Child Labor - the Group believes that children and young people are free of work responsibilities. The Group is committed to complying with the minimum age of employment required by the laws of the countries in which we do business. Moreover, the Group prohibits the use of child labor in our operations and supply chain.

Fair Wages & Benefits and Reasonable Hours - the Group believes that employees should receive fair wages. The Group is committed to ensuring that all applicable labor and employment laws are respected, and to making sure that all working conditions, including but not limited to wages, benefits, and hours of work, are respected.

3. Corporate governance mechanism

The Group strives to create a future where all individuals benefit from the principles outlined above. Therefore, we recognize our responsibility to ensure that we are not complicit in human rights violations, even when local laws do not specifically address them. To achieve this, the policy will be updated from time to time, and employees will receive education and communications related to these topics.

4. Commitment

The Group is dedicated to respecting and promoting internationally recognized human rights across all its operations. This extends to our employees, business partners and the communities where we operate. We strive to prevent any negative impact on human rights and expect our business partners to uphold the same standards in their operations and across their own supply chains.

5. Compliance and hotline

To achieve the above, the policy will be updated from time to time, and employees will receive education and communications related to these topics. The Group is committed to creating an environment in which open and honest communication exists with the Management. We encourage all individuals to report any instances or suspected instances of violations of this Policy, to seek guidance regarding policies and procedures, and to offer suggestions.

Access is currently made through the following website: <https://opc.ethics-hotline.co.il/>

The reports reach the Chairman of the Audit Committee and the EVP General Counsel. For the avoidance of doubt, it is clarified that nothing in the foregoing shall preclude contact or report through other communication channels such as:

A. A conversation

B. A letter sent to the following address: 121 Menachem Begin, Tel Aviv, OPC Ltd, 40th Floor (For the attention of the Chief Legal Officer).

C. By email to: nurit.traurik@opc-energy.com

D. By telephone: 073-250-5635

The Hotline is the conduit which ensures that your reports shall reach the right party, for the purpose of examining, processing and responding to them.

Kindly note that the "Hotline" is operated by a third party, Target Systems Ltd., which is responsible for its operation and providing access to the relevant parties with respect to data that was sent. OPC has no control over Target Systems Ltd's systems and/or servers, is not responsible for their operation, and undertakes not to try to bypass the system's protections.