

### **OPC Energy Ltd. – Anti-Corruption and Bribery Policy Highlights**

1. OPC Energy Ltd. (hereinafter, jointly with its subsidiaries - “**OPC**” or the “**Company**”) is committed to complying with the applicable anti-bribery and corruption laws in every country in which the Company operates, including the United States’ Foreign Corrupt Practices Act (hereinafter - the “**FCPA**”), and the prohibitions on bribery under the Israeli Penal Code, 1977 (hereinafter - “**Anti-Corruption Laws**”). The broad scope of the anti-corruption legislature requires full compliance on the part of the Company’s business partners and all third parties acting on its behalf (suppliers, subcontractors, consultants, service providers, etc.) (hereinafter – “**Business Partners.**”)
2. The Company expects its Business Partners to act in accordance with any law, and in particular, to comply with anti-bribery and corruption laws to the fullest extent.
3. This document concentrates the key provisions of the Company’s anti-bribery and corruption policy (hereinafter – the “**Policy**”) and is intended for convenience purposes only. Please ensure that you comply with the provisions of the Policy and submit written confirmation that you have read the Policy in full to your points of contact in the Company.
4. OPC prohibits giving, offering, promising, or approving any bribe to public servants, regardless of the form or the amount, directly or through others, anywhere in the world. OPC prohibits any act or behavior that might give rise to the appearance of bribery.
  - “**Bribe**” and “**bribery**” are defined as anything of value that is offered, promised, or given to a Public Servant, directly or indirectly (including, for example, by giving a Public Servant something of value through a Business Partner or through their family members), in order to wrongfully obtain a benefit or to obtain or retain a business relationship or a commercial advantage.
  - The term “**thing of value**” is defined broadly and is not limited to cash; it also refers, for example, to flights, meals, gifts, donations, invitations to sporting events or live performances, and other tangible and intangible benefits, such as services, loans, use of property or equipment, and job offers.
  - The term “**public servant**” is defined broadly, and it refers, among other things, to any person employed in government or public institutions (including health maintenance organizations, municipalities, banks, or international organizations, such as the UN); a person acting in an official capacity for a government agency; a person who staffs or is a candidate for a political office; as well as any family member of or entity acting on behalf of any of the above.

5. In addition, OPC prohibits offering or giving anything of value to an individual who is not a Public Servant, directly or indirectly, with the intent of incentivizing them to perform their duties improperly or to reward them for performing their duties improperly.
6. On top of the foregoing, as OPC's Business Partner, you are strictly prohibited from accepting bribes. You must use all means at your disposal to prevent bribery and corruption and comply with anti-corruption legislation. You must immediately report any violations or suspected violations of the above principles or the policy to your business contact with OPC or OPC's chief legal counsel.
7. In addition, the employees acting on behalf of the Company must refrain from any direct or indirect involvement in money laundering or terrorism financing activities, or any violations of the Trading With the Enemy Ordinance. The above entails a prohibition on making or facilitating transactions involving funds originating from criminal activity, such as fraud or bribery; as well as a prohibition on financing, supporting, or promoting acts of terrorism, terrorist organizations, or individual terrorists.
8. Reporting, fair treatment, prevention of harassment and investigation of suspicions - Each employee should promptly report any violation or suspected violation of the Policy, directly to Legal Counsel and the Company's Secretariat, or through the "hotline" – whether by using their name or anonymously. The Company supports reports made in good faith, prohibits any harassment of the reporting parties, and will conduct a thorough investigation of any report, after which it will submit a report with recommendations to the chairman of the board. The decisions made following the investigation will be documented and measures will be taken in accordance with the findings and the Legal Counsel's recommendations.
9. Awareness and training - The Company will conduct training sessions (in person or online) at least once a year on the Anti-Corruption and Bribery Policy, which will include the policy highlights, including identification of red flags and reporting procedures, while documenting and monitoring the employees' participation in training sessions under the responsibility of the Company's Legal Counsel and Secretariat.
10. OPC has zero tolerance for violations of the above principles or of the anti-bribery and corruption laws, and any such violation could result in OPC taking disciplinary or legal measures against the Company's employees, including termination of employment.