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# ANTI-BRIBERY AND CORRUPTION POLICY

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# 1. Introduction

## 1.1 Purpose of the Policy

This Anti-Bribery and Corruption Policy (the "Policy") is intended to establish a clear and consistent framework for preventing and addressing bribery and corruption in all aspects of Nofar's business activities. The Policy is based on the organization's commitment to ethical conduct and its belief that fair competition is essential for long-term success.

## 1.2 Scope of the Policy

The Policy applies to all employees, contractors, agents, and representatives of the organization, regardless of their position or location. It also applies to all business activities, including but not limited to:

- Procurement of goods and services
- Investment and financing activities
- Government relations

## 1.3 Commitment to Transparency

The Organization is committed to conducting its business in a transparent manner. This means that The Organization will:

- Proactively disclose any risks of bribery and corruption
- Provide transparent and timely disclosure of all payments to public officials
- Cooperate fully with all investigations into bribery and corruption

The Organization recognizes that transparency is essential for building trust with its stakeholders, including employees, customers, investors, and the public. By operating in a transparent manner, The Organization can help to prevent and address bribery and corruption, and it can promote a more ethical and corruption-free business environment.

# 2. Prohibition on Bribery and Corruption

## 2.1 Zero-Tolerance Approach

The Organization is committed to a zero-tolerance approach to bribery and corruption. This means that the organization will not tolerate any form of bribery or corruption in its business activities.

## 2.2 Forms of Bribery and Corruption

Bribery and corruption can take many forms, including:

- Direct bribery: Offering, promising, or giving something of value to a public official in exchange for an improper act or decision.
- Facilitation payments: Small payments made to public officials to expedite or facilitate routine administrative tasks.
- Kickbacks: Illegal payments made by suppliers or intermediaries to employees of The Organization or its affiliates in exchange for business advantages.
- Bid rigging: Collusion between competitors to fix prices or allocate contracts.

## 2.3 Gifts and Hospitality

The Organization prohibits its employees from offering or accepting gifts or hospitality that could be perceived as an attempt to influence business decisions. This includes:

- Gifts of significant value
- Expensive meals or entertainment
- Travel or accommodation
- Loans or other financial assistance

## 2.4 Conflicts of Interest

The Organization prohibits its employees from engaging in any activities that could create a conflict of interest. This includes:

- Having personal relationships with public officials that could influence their business decisions.
- Working for or advising a competitor or other entity that could conflict with their interests.
- Engaging in activities that could benefit themselves or their families personally.

# 3. Reporting and Investigation

## 3.1 Reporting Suspected Bribery

The Organization encourages its employees to report any suspected bribery or corruption. Employees can report their concerns to:

- Their supervisor or manager
- The Legal Department
- The Ethics Hotline

The Organization will maintain the confidentiality of all reports of suspected bribery or corruption. Employees who raise concerns in good faith will not be subjected to retaliation.

### 3.2 Investigations

The Organization will investigate all reports of suspected bribery or corruption promptly and thoroughly. Investigations will be conducted by an independent investigator or by a team of investigators with expertise in bribery and corruption prevention.

Investigations will be conducted in a fair and impartial manner. Employees who are the subject of investigations will have the opportunity to be present and to present their evidence and arguments.

### 3.3 Confidentiality

The Organization will maintain the confidentiality of all reports of suspected bribery or corruption. This means that the Organization will not disclose the identity of the reporter or any other information that could identify the reporter without the reporter's consent.

The Organization will also take steps to protect the confidentiality of employees who participate in investigations. This includes:

- Conducting investigations in a confidential manner
- Limiting access to confidential information to those who need to know
- Ensuring that confidentiality agreements are in place with all relevant parties

## 4. Disciplinary Action and Remediation

### 4.1 Consequences of Bribery Violations

Employees who violate the Anti-Bribery and Corruption Policy may be subject to a range of disciplinary actions, including:

- Termination of employment
- Fines
- Criminal prosecution

The severity of the disciplinary action will be determined by the seriousness of the violation and the employee's prior disciplinary history.

### 4.2 Retaliation Against Whistleblowers

The Organization prohibits retaliation against employees who raise concerns in good faith about suspected bribery or corruption. Retaliation against whistleblowers can take many forms, including:

- Termination of employment
- Demotion
- Harassment
- Discrimination

The Organization will take all necessary steps to protect whistleblowers from retaliation. This includes:

- Providing a confidential reporting mechanism
- Investigating all complaints of retaliation promptly and impartially
- Taking appropriate disciplinary action against employees who retaliate

### 4.3 Remediation of Harm Caused by Bribery

The Organization will take steps to remediate any harm caused by bribery or corruption. This may include:

- Returning improperly obtained funds
- Compensating victims
- Taking corrective action to prevent future misconduct

## 5. Due Diligence and Supplier Management

### 5.1 Conducting Due Diligence on Business Partners

The Organization will conduct due diligence on all potential business partners before engaging in any business relationship with them. This due diligence will include:

- Verifying the partner's identity and legal status
- Reviewing the partner's financial statements and creditworthiness
- Conducting background checks on the partner's management team
- Assessing the partner's compliance with anti-bribery and corruption laws

### 5.2 Managing Relationships with High-Risk Partners

The Organization will carefully manage its relationships with high-risk partners. This may include:

- Implementing additional due diligence procedures
- Establishing clear contractual provisions that prohibit bribery and corruption
- Providing more frequent monitoring and oversight of the relationship

### 5.3 Ongoing Monitoring of Suppliers

The Organization will continuously monitor its suppliers for any signs of bribery or corruption. This monitoring may include:

- Reviewing supplier invoices and payments
- Conducting surprise audits of supplier operations
- Encouraging suppliers to report any suspected bribery or corruption

By conducting due diligence on business partners, managing relationships with high-risk partners, and conducting ongoing monitoring, The Organization can help to mitigate its risk of bribery and corruption.

## 6. Training and Awareness

### 6.1 Providing Regular Training for Employees

The Organization will provide regular training for all employees, contractors, agents, and representatives who are responsible for or exposed to bribery and corruption risks. This training will cover:

- The Organization’s Anti-Bribery and Corruption Policy
- The risks of bribery and corruption
- How to identify and avoid bribery and corruption
- How to report suspected bribery or corruption

This training will be conducted on an ongoing basis and will be tailored to the specific roles and responsibilities of each employee.

### 6.2 Communicating the Policy Effectively

The Organization will communicate its Anti-Bribery and Corruption Policy to all employees, contractors, agents, and representatives in a clear and concise manner. This will be done through:

- Policy documents
- Training sessions
- Intranet postings
- Posters and other visual aids

The Organization will also ensure that the Policy is easily accessible to all employees, contractors, agents, and representatives.

## 6.3 Promoting Ethical Conduct

The Organization will create a culture of ethical conduct in which bribery and corruption are not tolerated. This will be done through:

- Leadership by example: Senior management will set the tone for ethical conduct by demonstrating their commitment to the Anti-Bribery and Corruption Policy.
- Open communication: Employees will be encouraged to report any suspected bribery or corruption without fear of retaliation.
- Positive reinforcement: Employees will be recognized and rewarded for their commitment to ethical conduct.

By creating a culture of ethical conduct, the Organization can help to deter bribery and corruption and promote fair competition.

## 7. Conclusion

### 7.1 Commitment to Ethical Conduct

The Organization is committed to conducting business ethically and in a manner that is fair and transparent. This commitment is reflected in their Anti-Bribery and Corruption Policy, which outlines their stance on bribery and corruption and sets out the steps the Organization will take to prevent and address bribery and corruption.

### 7.2 Dedication to Transparency and Accountability

The Organization is committed to transparency and accountability in all of its business dealings. This means that the Organization will:

- Adhere to all applicable laws and regulations
- Proactively disclose any potential conflicts of interest
- Make regular disclosures of its financial information
- Be open and responsive to any allegations of bribery or corruption

By being transparent and accountable, that can help to build trust with its stakeholders and demonstrate its commitment to ethical conduct.

### 7.3 Contribution to a Sustainable and Corruption-Free Renewable Energy Sector

The Organization is committed to contributing to a sustainable and corruption-free renewable energy sector. This means that they will:

- Promote Ethical conduct and best practices among suppliers and partners



- Support efforts to combat corruption and bribery in the renewable energy sector
- Contribute to the development of a transparent and fair renewable energy market

By working to reduce corruption in the renewable energy sector, they can help to ensure that this important industry is able to deliver its full potential for a more sustainable future.

By adhering to the principles of this Anti-Bribery and Corruption Policy, The Organization can help to foster a culture of transparency, accountability, and ethical conduct. This will not only protect them from the risks of bribery and corruption, but it will also help to build trust and credibility among stakeholders.