

DORAL

Renewable Energy

Doral's Anti-Bribery and Corruption Policy



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At Doral, we are committed to proper corporate governance, regulatory compliance, and ethical, responsible, and fair business conduct with all our stakeholders. We have set out the following values that serve as our compass for ethical conduct, standards of behavior that are outlined in our Company Code of Ethics:



Ensuring professionalism, excellence, and ethics

Aspiring for excellence

Investing in human capital

Belief in continuing education and development

Conduct according to business ethics, integrity, and fairness.

We support and promote employee development with the goal of preserving the highest level of professionalism, operational excellence and ethics in the Group's business and subsidiaries, enabling the application of knowledge and expertise in our areas of operation.



Succeeding together

Fairness in business

Foundation of trust

Cooperation

We affirm the importance of integrity and fairness while taking full responsibility in our areas of operation.

Our business is built on relationships of trust and integrity both in and outside of the Company and we hold all of our employees and representatives to high professional standards, requiring them to take responsibility both for their personal behavior and towards the organization.



Ensuring accuracy in our records and reports

We are committed to accurately recording all financial information and other business information related to the Company.

All our records and transactions comply with internal audits and accounting principles.

It is prohibited to record misleading or false information in the Company's records or reporting systems.

All information related to the Company is reported honestly, with the necessary accuracy and on timely dates, whether they are internal records, publicly available documents, including information submitted to governmental authorities.



Maintaining confidentiality and preventing use of insider information

The Company's stock trading policy prohibits buying or selling the Company's securities and/or shares in the Group's subsidiary companies and/or in a third party with which it has a business relationship, unless it is in accordance with the detailed procedure adopted by the Company on this matter.

An employee must not disclose or make implications regarding substantive non-public information to family members, friends, or others, either internal or external to the Company.

Employees are strictly prohibited from discussing financial, business-related, or other information about the Company with external parties unless they have been explicitly authorized to do so.



Ensuring proper disclosure

Our policy is to distribute substantive information regarding the Company's business only to employees authorized to use the information for a stated purpose.

We work to ensure complete, transparent, and comprehensible disclosure to provide a holistic picture of the Company's business and affairs.

Requests from media outlets, analysts, or shareholders regarding the Company are transferred to the Company secretary so that an authorized party can address such requests.

Central to all of Doral's operations is the prohibition of acts of bribery or any activity that could be construed as corruption.

We work diligently to implement this policy among all of the Company's managers and employees through training intended to ensure the effective implementation of our Code of Ethics and relevant procedures, alongside full compliance with all anti-bribery and corruption laws applicable in the countries where we operate and conduct our business.

Doral supports progress towards the **United Nations' (UN) Sustainable Development Goals (SDGs)**. As part of this commitment, we support SDG 8, decent work and economic growth, with the goal of ensuring lasting, inclusive, and sustainable economic development.

This policy is presented as a public document and is a declaration of Doral's commitment to ethical, responsible, fair business conduct, including the assumption of diligent care to prevent acts of bribery and corruption. Moreover, this document is intended to raise awareness of these issues among all stakeholders so that they may act accordingly. This document is relevant for all the Company's subsidiaries and joint ventures.

Prohibition of giving, receiving, or brokering bribes

At Doral, we strictly prohibit the giving, receiving, or brokering of bribes and regard such actions as serious offenses that stand in absolute contradiction with the Company's values and way of doing business. It should be emphasized that even rejection of an offer of a bribe may also constitute an offense in this sense.

We prohibit the furtherance of measures that are intended to obtain, promote, or secure a deal or confer an unfair advantage, directly or indirectly.

We prohibit our employees from giving, receiving, promising, approving, or providing any benefit, reimbursement, or any other illegal payment (other than customary gifts or benefits of insignificant value), to both civil servants or private-sector employees, among others, whether they are in Israel or abroad.

We prohibit fraudulent or bad faith conduct and forbid engagement in situations that may stipulate a conflict of interest or situations that may lead to unethical conduct.

A **bribe** is the provision of a benefit (something of value) directly or indirectly to persons, including government officials, business partners, existing or potential customers, for their personal use, to affect the actions or decisions they make in their professional capacity, whether the benefit was provided directly through a company employee or through a third party such as an intermediary, a representative, a supplier, a customer, a partner, a consultant etc.

It is not required that a benefit be provided immediately in exchange for a bribe. That is, even if the benefit is provided so that in the future the giver will take advantage of the services of the bribe recipient, this is considered a bribe.

A **benefit** is a wide-ranging concept, and it can include money, money equivalents (such as gift cards, meals, entertainment events, vacations, employment, contracts, gifts, excluding customary gifts and other benefits of insignificant value), equivalent services such as making repairs to the bribe recipient's home, goods or services of similar types of tangible economic value, making a transaction in which the bribe recipient is given a substantial discount beyond that which is customary in such a transaction, or assistance to the bribe recipient in making a transaction directly or indirectly (for example, providing information can be considered a benefit) etc.

Warning signs when working with business partners and intermediaries

Often, bribes are not given directly, but rather through an intermediary. Of course, not every payment to an intermediary constitutes a bribe, and, therefore, Doral's managers and employees have at their disposal a procedure that defines a list of events and/or circumstances that could indicate a concern regarding the existence of corruption.

In case of ambiguity or concern, we suggest consulting with Doral's Company secretary and/or internal auditor.

Preventing conflicts of interest

At Doral, we operate in accordance with all legal and regulatory provisions that work to ensure the prevention of conflicts of interest within the Group in general and the Company in particular. At the same time, as part of the Company's corporate governance and business ethics policy, several intra-organizational steps have been taken to prevent conflicts of interest and to ensure fair operations, including in the appointment of directors, who are required to complete a questionnaire and declaration that relates to affiliations and conflicts of interest, among other aspects. In addition, as part of the internal enforcement plan, we have adopted the "Reporting Procedure for Shareholders and Officers," and in preparation for the reporting of annual financial statements, we similarly distribute additional questionnaires to directors that relate to their affiliations and conflicts of interest, among other things. Moreover, as part of the internal

enforcement plan, we have adopted the “Shareholder Transaction Procedure,” that upholds a list of the Company’s shareholders, including directors, listing alongside parties affiliated with those individuals, such as family, business connections and companies in which they serve. All these procedures have been adopted and approved by the Board of Directors.

Compliance with regulation

Activity in the field of renewable energy is subject to the directives of various regulatory bodies and institutions, such as: local authorities, the Electricity Authority, the Israel Electric Corporation, the Israel Securities Authority, the Israel Tax Authority, planning and construction bodies, various government ministries – the Ministry of Agriculture, the Ministry of the Interior and the Ministry of Defense, the Ministry of Environmental Protection, and decisions, procedures, and standards made by bodies acting on their behalf. Approvals are usually required prior to commencement of construction of the facility and its commercial operations. Doral’s nature as a corporation, namely a reporting corporation with global operations in the United States, Italy, Poland, Romania, and Denmark, makes us subject to the laws of those countries, as well as to the various environmental laws and their requirements, at the federal, state, and local levels. Despite the fact that we have extensively internalized relevant legislation, standardization, and regulation, we have adopted intra-organizational procedures to ensure the Company’s proper management with **special emphasis on preventing bribery and corruption**, including through the Code of Ethics and an Anti-Bribery and Anti-Corruption Policy, which were adopted as part of the Company’s internal enforcement procedure on the topic of Securities Law.

Consequences for violating principles of this policy

Violations of the guidelines outlined in the Code of Ethics and this Anti-Bribery and Anti-Corruption Policy, and/or any other relevant principles presented in this policy, is tantamount to a breach of the employment agreement and exposes the violator to disciplinary action that could include termination of their contract or their employment, the issuance of monetary fines, criminal prosecution, and other consequences.

Reporting violations of Doral’s Code of Ethics, Anti-Bribery and Anti-Corruption Policy and commitment to non-retaliation

We work to guide and fully implement the Company’s relevant principles and guidelines in this area, and, accordingly, an employee who becomes aware of or suspects that a payment may be a bribe must report this as soon as possible to their direct manager, while also informing the Company secretary. If there is a concern that the direct manager

is involved in giving or receiving the bribe, the report is to be sent to the Company secretary only. In addition, it is possible to report anonymously via a comment box placed at the Company's offices. The Company secretary will conduct an appropriate and discreet inquiry into the report.

At Doral are committed to taking all necessary steps to prevent harm or retaliation against an employee who submits a report in good faith. Our procedures set out that a person holding authority in the Company must not act against an employee who filed a complaint in good faith or assisted in the filing of a complaint.

Our employees know that in any case of doubt regarding the legality of propriety of the action, they should consult with the Company secretary prior to taking action.

Tracking, monitoring and reporting

At Doral, employees' reports of concerns regarding violations of the Company's Code of Ethics, are handled with great sensitivity and care according to the procedures of the internal enforcement plan and policy documents, and thusly, we act immediately upon receiving knowledge of an incident.

In addition, we report on our relevant activities in the context of our annual ESG report.

Preventing bribery and corruption among all stakeholders

At Doral, we work to raise awareness and promote relevant action among all our stakeholders. Special emphasis is placed on our engagement with the following stakeholder groups:

- **Our employees** – annual training and enforcement of an ethical organizational culture based on integrity and fairness.
- **Business partners and suppliers** – encouraging suppliers and business partners to conduct business ethically and prevent bribery and corruption in their business operations. We also encourage supplier assessments of these aspects.
The company asks external parties (service providers/contractors/consultants) acting on its behalf and serving as its representatives to sign a clause undertaking to prevent bribery and corruption, as part of a joint legal contract.
- **Subsidiaries and portfolio companies** – evaluation of ESG activities and encouraging growth of related activities.
- **Communities and social partners** – conduct in accordance with work procedures that ensure that no community support mechanism is used for the purposes of bribery or corruption.

Implementation of this policy

- **Ongoing management of anti-bribery and anti-corruption at Doral:** to implement this policy and continuously monitor the management of this area, an internal enforcement officer has been appointed who is responsible for implementing the Company's related procedures, while drawing lessons aimed at improvement. In addition, the designated officer is responsible for providing responses and guidance regarding specific inquiries from employees on how to conduct themselves should such matters arise, along with examining the need to update the Company's relevant policies annually.
- **Our managers and employees:** Doral's managers and employees are responsible for the ongoing implementation of this policy in accordance with the Company's decisions.
- **Guidance and management of these topics by Doral's management:** Doral's management is committed to conducting open dialogue and properly handling incidents, should they arise.
- **Guidance from Doral's Board of Directors:** Doral's Board of Directors is committed to guiding and monitoring the implementation of this policy through an annual discussion conducted by the Audit Committee. Any revision to the Company's procedures on these topics requires the approval of the Audit Committee.

We invite our stakeholders to submit feedback or inquiries to the following email address: esg@doral-energy.com