



**ORMAT**

# **ORMAT TECHNOLOGIES**

---

## **SUPPLIER CODE OF CONDUCT**

September 2024

## 1. INTRODUCTION

---

Ormat Technologies, Inc. and its direct and indirect subsidiaries ("Ormat", "We", the "Company") is committed to ensuring the implementation of its values, as outlined in our Code of Conduct and Ethics, in our dealings with Suppliers, Contractors and Consultants (collectively "Suppliers"). In line with our Code of Business Conduct and Ethics<sup>1</sup>, Human Rights and Labor Standards Policy<sup>2</sup>, Environment and Climate Change Policy<sup>3</sup>, and Integrated Quality, Environment, Health & Safety Policy<sup>4</sup>, and to support the business integrity of our activities, we require our suppliers to honor our values and standards set forth in this Supplier Code of Conduct (the "Code"). In line with Ormat's commitment to compliance, suppliers working with Ormat are required to adhere to the relevant recommendations for sound governance, labor practices and environmental expectations outlined herein and in Ormat's Anti-Bribery and Anti-Corruption ("ABAC") Policy<sup>5</sup>.

Beyond reflecting Ormat's values and Terms and Conditions for Suppliers, this Code follows those principles set forth in internationally recognized standards such as the United Nations Declaration of Human Rights, the International Labor Conventions (ILO), and other relevant laws and regulations.

This Code is distributed to all existing, new and potential suppliers, and is made publicly available on the Sustainability section of our website [here](#).

## 2. GENERAL REQUIREMENTS

---

### *Compliance with Law and Regulation*

Ormat requires all Suppliers to meet or exceed all applicable laws and regulations, in line with the Company's Code of Business Conduct and Ethics.

The Company acknowledges that there are differences in local laws and practices between countries. In some cases, the Code establishes policies and/or requirements that would not otherwise be required according to the regulatory framework in the country. In keeping with the Company's commitment to meet the highest standards of business conduct wherever it does business, all suppliers are asked to comply with all aspects of the Code of Business Conduct and Ethics, even if it is not required by local laws. Conversely,

---

<sup>1</sup>[Ormat Code of Conduct and Business Ethics](#)

<sup>2</sup>[Human Rights and Labor Policy](#)

<sup>3</sup>[Environment and Climate Change Policy](#)

<sup>4</sup>[Integrated Quality, Environment, Health & Safety System Policy](#)

<sup>5</sup>[Anti-Bribery and Anti-Corruption Policy](#)



there may be laws in certain countries which may not specifically apply outside of those countries, and therefore, may not be specifically addressed in the Code of Business Conduct and Ethics. As such, suppliers are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when uncertain. Suppliers are welcome to consult with Ormat on this topic by submitting their query to the email address noted below in the “Communication Channels” section of this document.

Without deviating from the above responsibility, the Company may add policies applicable to specific regions as required or appropriate under local laws.

### ***Prohibition of Corrupt Practices and Compliance with the Company's ABAC Policy***

Ormat is fully committed to complying with all applicable laws and regulations, particularly those that mandate fair conduct, when carrying out its business throughout the world. The Company maintains and enforces compliance policies, including the ABAC Policy, which sets forth expectations for all Ormat employees, officers and directors, and Suppliers to provide guidance in their business dealings worldwide, so that they may at all times act in compliance with the U.S. Foreign Corrupt Practices Act (“FCPA”) and all other applicable anti-corruption and criminal laws around the world (collectively “Anti-Corruption Laws”).

The Company expects Suppliers to demonstrate a zero-tolerance policy towards all forms of corruption and bribery. A bribe is broadly defined under relevant Anti-Corruption Laws, and includes an offer, promise, or payment in the form of gifts, money, or anything of value offered to gain a business advantage. Suppliers must take extra care to avoid even the appearance of impropriety when dealing with government officials on Ormat’s behalf.

Ormat’s ABAC policy can be found on the Company website at the following link: <https://www.ormat.com/en/company/welcome/governance/>.

As part of Ormat’s compliance program, the Company conducts due diligence on relevant Suppliers and potential business partners. All Suppliers are required to understand and follow Ormat’s compliance rules. Per our ABAC Policy, all Suppliers shall maintain monitoring and enforcement procedures that comply with applicable Anti-Corruption Laws.

### ***Trade Sanctions Compliance***

Suppliers will at all times comply with all applicable trade sanction laws, regulations, including but not limited to all sanctions and prohibitions administered by the U.S. Department of Treasury Office of Foreign Assets Control (“OFAC”), the U.S. Department of State, the U.S. Department of Commerce, or any other U.S. entity pursuant to enabling legislation or executive order, the European Union (EU), HM Treasury, any European member state, or any other country, the United Nations or any other organization of



countries, targeted against a particular person, entity, organization, business, country, or regime.

Suppliers agree that the Company may immediately terminate any and all of its obligations with Suppliers if the Company finds any reason to believe that Suppliers has violated any applicable trade sanction law or regulation or if the Company has reason to believe that its transactions with Suppliers would expose the Company to the risk of violating trade sanction laws or regulations of any of the above-mentioned bodies. In the event of such termination, Suppliers agree that the Company shall not be subject to any liability as a result of, or in connection with, any such termination.

### ***Antitrust and Competition Laws***

Ormat believes in fair and open competition and expects the same from our Suppliers. As such, compliance with antitrust and competition laws worldwide is important to our business. Suppliers are expected to conduct themselves in compliance with these laws when conducting business with, for, or on behalf of Ormat. Suppliers should refrain from entering into any improper agreements with competitors, exchanging competitive or sensitive information, fixing prices, dividing up customers or regions, or otherwise pursuing any conduct that may be considered anticompetitive.

### ***Written Agreements Required***

Suppliers will be retained and paid pursuant to a written agreement supplied or approved by the Company's Legal Department, and only following the express written approval by the Company Officer with authority to authorize retention of such Supplier.

Suppliers shall be permitted to work with the Company only if they operate in conformity with their written contracts, all applicable laws and rules, this Code, and the Company's ABAC Policy and Compliance program.

### ***Avoiding Conflicts of Interest and Risk Analysis***

All Suppliers must avoid conflict of interest situations between their direct or indirect personal interests (including with respect to family members) and the interests of the Company. If a conflict of interest arises, the Supplier must disclose any relevant connections to their relevant point of contact with the Company.

### ***Prohibition on Insider Trading***

No Supplier, and no individual connected with a Supplier, may buy or sell shares or other securities of Ormat or any other business, or give advice thereon, if such Supplier or individual has access by reason of professional activities with Ormat to any non-public information about Ormat or that business. Supplier trading of the Company's securities, including the exercise of stock options, is permitted only in accordance with the Code of Business Conduct and Ethics, Form of Insider Trading and Confidentiality Policy



Statement, and applicable laws and rules promulgated by the U.S. Securities and Exchange Commission, the New York Stock Exchange, and the Tel Aviv Stock Exchange.

### ***Protection of Intellectual Property and Proprietary Information***

The Company recognizes intellectual property rights and proprietary confidential information (collectively “IP”) as a central shareholder value. Suppliers shall take appropriate action to preserve and maintain the Company’s IP and respect the IP rights of others. Supplier shall not use or disclose Company’s IP without Company’s express written authorization memorialized in an agreement signed by an authorized officer of the Company.

### ***Human Rights and Labor Standards***

Ormat communicates its Human Rights & Labor Policy to its stakeholders, including Suppliers and business partners, and outlines its expectations regarding respect for human rights, avoiding infringements of human rights, and addressing human rights impacts. The Company’s Human Rights & Labor Policy is publicly available on our website at the following link: [Ormat Human Rights & Labor Policy](#)

The Company expects its Suppliers to honor international human rights declarations that ensure the implementation of advanced human rights practices, including the International Labor Organization’s Declaration of Fundamental Principles and Rights at Work and the Universal Declaration of Human Rights, as well as all applicable work and labor-related laws in all countries where we do business.

We prohibit forced and child labor practices<sup>6</sup> and expect our Suppliers to respect their employees and treat them with dignity, consistent with decent and fair labor practices.

We require our Suppliers to observe all applicable laws and regulations relating to the health, safety, and fair treatment of their employees, workers, and personnel. This includes the requirement that Suppliers will have effective safety programs in place regarding emergency preparedness, chemical, physical and biological agent exposure, ergonomics and incident reporting and investigation.

We expect our Suppliers to compensate employees in accordance with applicable laws and regulations, to provide a formal grievance mechanism for employees with concerns about their rights, benefits or working hours, and to encourage diversity and to avoid unlawful discrimination in the workplace.

---

<sup>6</sup> A “child” is any person who is younger than (i) 15 years old (or 14 where the law of the country permits); (ii) the minimum age for completing compulsory education in the country of employment; or (iii) the minimum age for employment in that country, whichever is the highest.

Finally, we expect our Suppliers to recognize their employees' rights to join or refuse to join labor unions or associations and to engage in collective bargaining consistent with applicable law.

### ***Responsible Sourcing and Conflict Minerals***

We aim to source all the materials used in our supply chain for the manufacture of our products in a way that upholds human rights and discourages reprehensible practices such as human trafficking and forced labor in the supply chain. We also aim to account for the rights of indigenous peoples in extractive industries for metals and elements used in our business.

We expect our Suppliers to engage in responsible sourcing practices, using verified sources where possible. Consistent with this Code, and its Human Rights & Labor Policy, the Company has established a detailed Conflict Minerals Policy<sup>7</sup> addressing the human rights and labor issues connected with the mining and trading of certain materials used in the electronics industry supply chain.

### ***Assessment and Management of Risks***

In line with the abovementioned policies, the Company expects its relevant suppliers to have adequate processes in place for identifying environmental, health and safety, labor, human rights, ethics and corporate governance-related risks that may be associated with their operations and the products and/or services that they provide the Company. The Company expects such Suppliers to have adequate procedures and controls in place for managing such risks and ensuring regulatory compliance.

### ***Maintaining Documentation and Records***

The Company expects its suppliers to maintain adequate records and documentation of their business dealings as they pertain to the Company.

---

<sup>7</sup> [Ormat Conflict Minerals Policy](#)

### 3. ENVIRONMENTAL RESPONSIBILITY AND INTEGRATED QUALITY, ENVIRONMENT, HEALTH & SAFETY POLICY

---

#### ***Obtaining Necessary Permits and Observing Reporting Requirements***

The Company expects its Suppliers to secure and maintain all necessary and appropriate environmental permits, approvals, and registrations.

#### ***Implementation of Environmental Policies***

The Company expects its Suppliers to adhere to its Environment and Climate Change Policy. Ormat reserves the right to review Suppliers' written environmental policies, including those related to environmental protection, sustainability, prevention of pollution and compliance with law. Ormat expects its Suppliers to consider climate change-related risks associated with their business activities and to control and mitigate these risks.

#### ***Adherence to Our Integrated Quality, Environment, Health & Safety System Policy***

The Company expects all Suppliers to adhere to our Integrated Quality, Environment, Health & Safety System Policy<sup>8</sup> in all material respects, including the regulatory and reporting requirements detailed therein.

#### ***Identify and Assign Relevant Roles for Management***

The Company expects its Suppliers to identify and assign relevant management to ensure implementation of comprehensive quality, environment, health and safety systems and programs.

#### ***Assessment and Management of Risks***

In line with the abovementioned policies, the Company expects its relevant suppliers to have adequate processes in place for identifying environmental, health and safety, labor, human rights, ethics and corporate governance-related risks that may be associated with their operations and the products and/or services that they provide the Company. The Company expects such Suppliers to have adequate procedures and controls in place for managing such risks and ensuring regulatory compliance.

---

<sup>8</sup>[Integrated Quality, Environment, Health & Safety System Policy](#)

## 4. COMMUNICATION CHANNELS


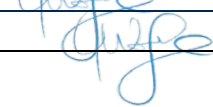
---

For questions or comments regarding the Code, or to report infringement or suspected infringement of related law or regulation, or any Company requirement, Suppliers may email us at [abac.compliance@ormat.com](mailto:abac.compliance@ormat.com), or utilize our Contact form available at: <https://www.ormat.com/en/company/contact/main/>. Anonymous inquiries and reports may be submitted by telephone at 1-866-294-5535 or online at <https://ormat.gan-compliance.com/p/report>.

### *Updating and Reviewing the Code*

Ormat reserves the right to periodically review and amend this Code in order to align our standards of conduct, corporate values, sustainability goals and strategic targets.

### REVISION HISTORY

| Rev. | Date         | Details                          | Approved by:   |
|------|--------------|----------------------------------|--|
| 0    | Sept-2021    | Supplier Code of Conduct         |  |
| 1    | 13-Sept-2024 | Revised Supplier Code of Conduct |  |





# APPENDIX A

## SUPPLIER CODE OF CONDUCT: VENDOR ACKNOWLEDGEMENT

---

Name/Company Name: \_\_\_\_\_

Vendor Location: \_\_\_\_\_

Ormat End User Location: \_\_\_\_\_

The contents of the below listed policies set forth expectations for entities carrying out duties on behalf of or for the benefit of any Ormat entity (collectively “Ormat”).

We ask our suppliers to honor our values and standards set forth in this Supplier Code of Conduct. In line with Ormat’s commitment to compliance, suppliers working with Ormat are required to adhere to the relevant recommendations for sound governance, labor practices, and environmental expectations outlined in the attached Supplier Code of Conduct and in Ormat’s Anti-Bribery and Anti-Corruption (“ABAC”) Policy.

I hereby acknowledge receipt of the Supplier Code of Conduct. Digital copies of the additional policies listed below are available on Ormat’s website at <https://www.ormat.com/en/company/engagement/view/?ContentID=9199>.

I am aware that it is my responsibility to familiarize myself with the contents of the below policies and understand that I should direct any questions to my Ormat point of contact.

- Supplier Code of Conduct
- Anti-Bribery and Anti-Corruption Policy
- Code of Business Conduct and Ethics
- Human Rights and Labor Standards Policy
- Environment and Climate Change Policy
- Integrated Quality, Environment, Health & Safety Policy

Since the information, policies, and processes described in the above policies are subject to change, I acknowledge that revisions to the policies may occur. I acknowledge that it is my responsibility to read and comply with the rules and regulations contained in Ormat’s Supplier Code of Conduct and any revisions made thereto. This acknowledgement will be retained by Ormat for recordkeeping purposes.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_