

/ SolarEdge: Our Approach to Anti-Corruption

Introduction

SolarEdge conducts its business in accordance with the highest ethical standards of corporate leadership and citizenship and expects all its employees to act in accordance with the highest standards of personal and professional integrity. We believe that operating in an ethical manner helps reinforce the trust of all our stakeholders in our business and enables us to grow sustainably, thereby helping us deliver our purpose of powering the future of sustainable energy so we can all enjoy better living and a cleaner, greener future. By operating in an ethical manner, and with integrity, we mitigate risks to our business and protect shareholder value in term long term.

All forms of corruption are absolutely prohibited at all levels of our business, everywhere we do business. This prohibition is encapsulated in our [Employee Code of Conduct](#); this document, Our Approach to Anti-Corruption, provides further focus and detail.

This Approach applies to all directors, officers and employees of SolarEdge Technologies, Inc., including all of its subsidiaries.

Definition

Corruption includes practices such as bribery, facilitation payments, fraud, extortion, collusion, and money laundering; and the offer or receipt of, loans, fees, rewards, gifts, entertainment or hospitality as defined in our guidelines, or other advantages as an inducement to do something that is dishonest, illegal, or represents a breach of trust.

Our Approach

All forms of corruption are absolutely prohibited at all levels of our business, everywhere we do business. This prohibition is encapsulated in our [Employee Code of Conduct](#); this document, Our Approach to Anti-Corruption, provides further focus and detail.

This Approach applies to all directors, officers and employees of SolarEdge Technologies, Inc., including all subsidiaries, and to any individual acting on their behalf.

Prohibiting Bribes

No one acting on behalf of the Company may use bribes, kickbacks illegal payments or other corrupt practices in conducting the Company's business whether provided directly or through a third party such as a distributor, customs broker or other agent. Employees must comply with the U.S. Foreign Corrupt Practices Act ("FCPA") whether they are located in the United States or abroad, the UK Bribery Act, and other applicable local anti-bribery and anti-corruption laws and regulations wherever they are located.

Personal Conduct

Every director, officer or employee of SolarEdge must undertake to observe the following standards of personal conduct with regard to anti-corruption:

Reasonable Gifts and Business Courtesies

SolarEdge recognizes that it is common practice to exchange gifts and business courtesies with customers, business associates and others to create goodwill and sound working relationships. However, actions taken on behalf of the Company should be free from any suggestion that favorable treatment was sought by, received from or given to individuals or organizations that do business or seek to do business with the Company.

Employees may not solicit or accept gifts or business courtesies, including money, services or anything else of value when doing so may influence, or be perceived as influencing, a decision or action. Similarly, employees may not offer or give gifts or business courtesies, money, services or anything else of value when doing so may influence, or be perceived as influencing, a decision or action. Immediate family members are subject to the same policy.

Employees may not accept or give non-cash gifts to anyone with whom the Company does business, unless that gift is promotional in nature and nominal in value. Gifts of nominal value are those that do not exceed \$250. Cash gifts are never permitted. Business courtesies include, but are not limited to:

- / meals, drinks, entertainment (including tickets to sports or social events),
- / recreation,
- / transportation,
- / honoraria or use of the donor's time,
- / equipment, materials, or facilities.

Employees may accept or give a business courtesy if it is:

- / Appropriate (the event promotes a legitimate business purpose);
- / Reasonable (the invitation is for a meal or event that is not lavish, meaning that it does not exceed \$250); and
- / Consistent with the ethical practices of the Company.

Employees should avoid a pattern of accepting frequent business courtesies from the same persons or companies. Additionally, many organizations have their own policies on giving and accepting gifts and business courtesies. Employees should not offer a gift or business courtesy to another person if the employee knows that doing so would violate policies at the recipient's organization. If the employee does not know, the employee should ask before providing the gift or business courtesy.

Participation in Outside Activities

The Company understands that employees participate in a variety of activities outside their work at the Company. Many outside activities, such as volunteering for a charity or participating in a community organization, are unlikely to affect an individual's work at the Company. At the same time, employees should be sensitive to the possibility that participating in outside activities could create a conflict of interest. Examples of outside activities that could create a conflict of interest include:

- / Outside employment;
- / Providing goods or services to a competitor or business partner of the Company; and
- / Having a financial interest in an outside supplier or vendor that provides goods or services to the Company.

Managing Financial Interests

The Company respects the right of employees to manage their investments and does not wish to interfere with personal financial opportunities. However, having certain personal financial interests or engaging in certain transactions could create a conflict of interest. Examples of financial interests and transactions that could create a conflict of interest include:

Having a substantial personal financial interest in either a competitor or a business partner of the Company (other than an interest of less than 1% of the outstanding securities of a public company); and Borrowing from, or lending cash to, customers or suppliers (other than personal loans from financial institutions with which the Company maintains business relationships).

Taking Advantage of Corporate Opportunities

Employees should not take, for themselves or others, business opportunities that are discovered through the use of Company property, Company or through their position with the Company. Employees are prohibited from using Company property, information or position for personal gain and from competing with the Company.

Anti-corruption Due Diligence in our Markets and Supply Chain

When contracting or engaging with suppliers, including all third-party contract manufacturers, general suppliers, service providers and other vendors, as well as distributors or licensed resellers, sales and procurement staff at SolarEdge apply due diligence to ensure that such engagements may not be an actual or potential cause of conflict of interest. In the case of a suspected conflict of interest, for example, engaging with companies in which direct family members have a significant financial interest, procurement staff refer the case to SolarEdge's General Counsel, who will consult with relevant parties as required and deliver a decision. In all cases, the supplier is required to disclose details of the potential conflict of interest so that appropriate safeguards can be applied.

Anti-Corruption Risk Assessment

SolarEdge performs a periodical risk assessment of fraud and corruption risk and safeguards throughout our business and extended supply chain. These assessments may be performed in-house or by third party specialists whom we engage. Following each assessment, recommended additional safeguards are reviewed and actioned where relevant. The report of fraud and anti-corruption risk is presented to management. It serves as an input for the Company's internal audit work plan

which is presented to the Audit Committee of the Board of Directors.

Anti-Corruption Training

We conduct anti-corruption training as part of our basic [Employee Code of Conduct](#) training for new hires and biennial refresher training for all employees. In addition, all staff involved in high-exposure roles, for example, in sales teams, finance and procurement, receive annual dedicated training to reinforce awareness and application of best practice.

Governance of Anti-Corruption at SolarEdge

Accountability for anti-corruption at SolarEdge is overseen by the Audit Committee of our Board of Directors and managed operationally by the Vice President, General Counsel, and the Chief Financial Officer who report on anti-corruption to the Chief Executive Officer and to the Audit Committee of the Board of Directors.

Related Documents

[Our Employee Code of Conduct](#)

[Our Approach to Compliance](#)

[Our Approach to Supplier Management](#)

[Our Vendor Code of Conduct](#)

[Our Approach to Human Rights](#)

Validity

This Approach to Anti-Corruption is endorsed by SolarEdge's Board of Directors and Executive Team. It is supported by internal procedures and reporting mechanisms that support effective implementation.

Last updated: June 2021