



## **POLICY FOR COMPLAINTS**

**REGARDING ACCOUNTING, INTERNAL  
ACCOUNTING CONTROLS OR  
AUDITING MATTERS**



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ENLIGHT RENEWABLE  
ENERGY LTD.

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## 01. Introduction

Enlight Renewable Energy Ltd. (the "**Company**") is committed to full and accurate financial disclosure and to maintaining its books and records in compliance with all applicable laws, rules and regulations. The Company wishes to encourage employees, independent contractors, third-party vendors, customers and business partners to make the Company aware of any practices, procedures or circumstances that raise concerns about the integrity of its financial disclosures, books and records. Therefore, the Audit Committee of the Board of Directors of the Company has adopted this policy (the "**Policy**") to govern the receipt, retention and treatment of complaints regarding the Company's accounting, internal accounting controls or auditing matters, and to protect the confidential, anonymous reporting (to the extent permitted by applicable law) of employee concerns regarding questionable accounting or auditing matters. This Policy is in addition to the Company's Code of Ethics and Conduct, which describes the policy and procedures for reporting any illegal or unethical behavior.

For purposes of this Policy, an "**Accounting Complaint**" is a complaint about accounting, internal accounting controls, auditing matters or questionable financial practices, including but not limited to complaints of:

- fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements to the Securities and Exchange Commission (the "**SEC**") or the investing public;
- violations of SEC rules and regulations or any other laws applicable to the Company's financial accounting, maintenance of financial books and records, internal accounting controls and financial statement reviews or audits;

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- significant deficiencies in or intentional noncompliance with the Company's internal accounting controls;
- misrepresentations or false statements regarding a matter contained in the financial records, financial reports or audit reports of the Company; and
- deviation from the full and fair reporting of the Company's financial condition.

If requested by the employee, the Company will protect the confidentiality and anonymity (where legally permitted) of the employee to the fullest extent possible, consistent with the need to conduct an adequate review. Independent contractors, vendors, customers, business partners and other parties external to the Company will also be given the opportunity to submit Accounting Complaints; however, the Company is not obligated to keep Accounting Complaints from non-employees confidential or to maintain the anonymity of non-employees.

Accounting Complaints will be reviewed by the Company's General Counsel or such other persons as the Audit Committee determines to be appropriate (the "Compliance Officer"), under the Audit Committee's direction and oversight. In the event that the Company contracts with a third party to handle complaints or any part of the complaint process, the third party will comply with these policies and procedures. The Company will abide by all laws that prohibit retaliation against employees who lawfully submit complaints under these procedures.

## 02. Reporting Accounting Complaints

The Company urges any person desiring to make an Accounting Complaint to contact the Compliance Officer, directly. For persons who wish to report an Accounting Complaint but do not wish to contact the Compliance Officer directly, the Company has established the following four alternative procedures to report an Accounting Complaint:

- A. Ethics Hotline: Any person may call +1-844-982-1765 to report an Accounting Complaint. The phone call will be received by a third-party contractor specifically engaged to provide Accounting Complaint services.
- B. Employees who contact the Ethics Hotline may submit their complaint confidentially or anonymously and need not provide their name or other personal information. If such information is provided, reasonable efforts will be used to conduct the investigation that follows from any employee call in a manner that protects the confidentiality and anonymity of the employee making the call. While you may remain anonymous, the Company prefers that you identify yourself so that the Company can obtain all facts and properly investigate allegations. The intake information may be received by a third-party contractor specifically engaged to provide the hotline services or an internal person specifically designated to receive hotline calls. The information from the Ethics Hotline will be documented in a format acceptable to the Company and will include at a minimum a written description of the information received concerning the Accounting Complaint allegations and will be provided to the Compliance Officer.
- C. Written Complaints to Compliance Officer: Any person may report an Accounting Complaint to the Compliance Officer in writing marked CONFIDENTIAL and mailed to the following address: Lisa Haimovitz, 13 Ha'amal St.,

Afek Industrial Park, Rosh Ha'ayin 4809249 P.O. Box 11659 (at Enlight Renewable Energy Ltd).

- D. Audit Committee: Any person may report an Accounting Complaint to the Audit Committee directly, orally or in writing marked CONFIDENTIAL and mailed to the following address: Liat Benyamini, 13 Ha'amal St., Afek Industrial Park, Rosh Ha'ayin 4809249 P.O. Box 11659 (at Enlight Renewable Energy Ltd) Employees submitting this information need not provide their name or other personal information.

Non-Accounting Complaints submitted through any of the foregoing channels will be directed to the appropriate reviewer to investigate and determine the legitimacy of such complaint, as set forth in the Company's Code of Ethics and Conduct.

Upon receipt of an Accounting Complaint, the Compliance Officer or the Audit Committee, as applicable, will acknowledge receipt to the person reporting the Accounting Complaint if possible. Reasonable efforts will be used to conduct the investigation that follows from any employee who reports an Accounting Complaint in accordance with the procedures set forth herein in a manner that protects the confidentiality and anonymity (to the extent permitted by applicable law) of the employee submitting the Accounting Complaint.

### 03. Review and Investigation of Accounting Complaints

Accounting Complaints received by the Compliance Officer or the Audit Committee, as applicable, will be reviewed and investigated either by himself, herself or themselves or by a designated employee, outside counsel, advisor, expert or third-party service provider. If determined to be necessary by the Compliance Officer or the Audit Committee, as applicable, the Company will provide for appropriate funding to obtain and pay for additional resources that may be necessary to conduct the investigation, including without limitation, retaining outside counsel and/or expert witnesses. Unless otherwise directed by Compliance Officer or the Audit Committee, as applicable, any person assigned to investigate an Accounting Complaint will report his or her findings and recommendations to both the Compliance Officer and the Audit Committee.

Periodically and whenever requested by the Audit Committee, the Compliance Officer will submit a report to the Audit Committee (and any member of Company management that the Audit Committee directs to receive such report) that summarizes each Accounting Complaint made to the Compliance Officer within the last twelve months and shows specifically: (i) the complainant (unless anonymous (to the extent permitted by applicable law) in which case the report will so indicate), (ii) a description of the substance of the Accounting Complaint, (iii) the status of the investigation, (iv) any conclusions reached by the investigator and (v) findings and recommendations.

## 04. Confidentiality and Anonymity of Persons Reporting Accounting Complaints

While the Company prefers that persons reporting Accounting Complaints identify themselves to aid in the investigation, if necessary, reports may be made anonymously if desired, except in countries that have laws that do not allow for anonymous reporting. If requested by the employee and to the extent permitted by applicable law, the Company will protect the confidentiality and anonymity of an employee who makes an Accounting Complaint to the fullest extent possible, consistent with the need to conduct an adequate review and investigation of the Accounting Complaint

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## 05. Access to Reports and Records Regarding Accounting Complaints

All reports and records associated with Accounting Complaints are considered confidential information and access will be restricted to the Compliance Officer, the members of the Audit Committee and such other persons reasonably determined by the Compliance Officer or the Audit Committee to require such access. Access to reports and records may be granted to other parties at the discretion of the Audit Committee.

Accounting Complaints and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any corporate policy in place at the time.

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## 06. Disclosure of Investigation Results

Accounting Complaints and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as may be required by any legal requirements or regulations or by any Company policy in place at the time.



## 07. Retention of Records

All Accounting Complaints and documents relating to an Accounting Complaint made through the procedures outlined in this Policy will, subject to applicable law, be retained for at least five years from the date of the complaint, after which time the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry or investigation, in which case the information may not be destroyed and must be retained for the duration of that litigation, inquiry or investigation and thereafter as necessary.

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## 08. No Retaliation

The Company will not discipline, discriminate against or retaliate against any person who reports an Accounting Complaint in good faith and will not tolerate any such action. It will abide by all laws that prohibit retaliation against employees who lawfully submit complaints under these procedures. The Company urges any employee that believes that he or she has been subjected to retaliation due to submitting an Accounting Complaint, to immediately report the issue to the Compliance Officer, an executive officer of the Company or any supervisor. The Company will promptly and thoroughly investigate any assertion that a manager, supervisor or employee is involved in discrimination or retaliation related to reporting of or the Company's subsequent investigation of an Accounting Complaint.

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## 09. Notice to Employees

A notice to the employees of the Company and the Company's affiliates regarding the adoption of this policy will be made using good employee communications

practices. These employee communications may differ by jurisdiction, and may comply with local applicable laws on whistle-blower procedure communications to employees. Communications will include instructions on the method by which Accounting Complaints may be submitted.

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## 10. Periodic Reviews and Amendment

This Policy is intended to meet the requirements of Rule 10A-3(b)(3) under the U.S. Securities Exchange Act of 1934, as amended.

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## 11. Compliance with Law

This Policy is intended to meet the requirements of Rule 10A-3(b)(3) under the U.S. Securities Exchange Act of 1934, as amended.

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## 12. European Data Privacy

This section sets out how the Company processes personal data of individuals in Europe, including rights that those individuals have.

The Company will process personal data including information about employer, role, function, as well as information about individuals who are subject of the Accounting Complaint, a description of alleged misconduct (including potential criminal violations), supporting documentation, information gathered to verify the information reported and a summary of the verification process, the outcome of the report, and relevant information required to accurately complete or investigate the report,

irregularity or Accounting Complaint. If the Accounting Complaint is not made anonymously, the Company may process personal data including the name and contact details of the reporting person. The Company will process this information to investigate the Accounting Complaint, review compliance against Company policies and procedures and applicable laws/regulations and decide on whether to take any further action (including disciplinary action). The lawful basis of this processing is to comply with the Company's legal obligations and because the processing is in the Company's legitimate interest to comply with its legal responsibilities and to run a successful and efficient business.

The Ethics Hotline is run by a third-party contractor and, depending on the nature or seriousness of the reported misconduct, personal data will be transferred to subsidiaries or affiliates of the Company or third parties located in Israel and the US. Please contact the Compliance Officer for further information on transfers.

Individuals may have rights in relation to personal data that the Company processes, though some rights only apply in certain circumstances. These rights include the right to access, correct, port, or erase personal data, or to restrict or object to the use of personal data. Individuals can exercise these rights by contacting the Compliance Officer at the address set out above. Individuals may also complain to their local data protection regulator about the Company's data processing.