



ORMAT

ORMAT TECHNOLOGIES

POLITICAL CONTRIBUTIONS

September 2021



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1. PURPOSE

Ormat Technologies, Inc. (“Ormat” or “the Company”) is committed to being a responsible corporate citizen wherever we do business and is committed to complying with all applicable laws, rules, and regulations regarding the use of Ormat’s funds, assets, and resources in connection with political activity.

This Political Contributions Policy (“the Policy”) provides all persons covered by this Policy with guidelines for the offering and/or giving of political contributions in association with or on behalf of the Company. Ormat personnel are reminded that Ormat maintains an Anti-Bribery and Anti-Corruption (“ABAC”) Policy which is applicable to all U.S. and international operating units. This Policy complements Ormat’s ABAC Policy.

2. WHO AND WHAT IS COVERED?

This Policy applies to all Ormat Persons. “Ormat Persons” includes Ormat officers, director, employees, and those not directly employed by Ormat but who are carrying out duties on behalf of or for the benefit of Ormat, including, but not limited to third-party consultants, representatives, agents, and business partners.

3. POLITICAL CONTRIBUTIONS

Political contributions are the provision of money, venues, equipment, personnel time, or any other form of financial aid to support a political goal, including local, regional, or national political fundraising events, providing goods or services, paying employees during working hours to work at a political function, or paying for campaign expenses of a political party or candidate.

All political contributions must comply with all applicable law. With respect to all political contributions, Ormat’s CCO shall, as necessary, consult with external legal counsel specialized in the array of laws governing the applicable political process.

PROHIBITED POLITICAL CONTRIBUTIONS (ALL JURISDICTIONS):

- Persons not directly employed by Ormat but who are carrying out duties on behalf of or for the benefit of Ormat, including, but not limited to, third-party consultants, representatives, and agents, and administrators of any community funds or trusts in the name of or for the benefit of Ormat, are prohibited from making any political contribution on behalf of Ormat.
- United States federal law prohibits Ormat from making political contributions in connection with elections for federal office (President, Vice President, Senator, Congressional Representative).



- Political contributions in the form of cash, non-endorsed checks and other bearer-monetary instruments are prohibited.
- Ormat Persons are not permitted to offer or give political contributions that are offered or given with the intention of influencing someone to act improperly or influencing a decision made by a Public Official.
- Ormat Persons are not permitted to offer or give political contributions that could create the appearance of impropriety, considering the value, time, place, and other circumstances affecting such benefits.

Each U.S. state has additional laws, rules, and regulations governing political contributions in state and local elections which may or may not allow corporate contributions to candidates for state and local office. Local law in other jurisdictions where Ormat does business may apply.

PERMITTED POLITICAL CONTRIBUTIONS (U.S. and Israel):

- Permitted Political Contributions are those contributions that do not fall under the Prohibited Political Contributions section, above, and which have received the required internal approvals detailed below.
- Political contributions with a value up to \$1,500 per recipient per transaction, and in aggregate up to \$3,000 per recipient over a twelve-month period are permitted if approved by an Ormat EVP. The Approval Form at **Annex A** must be completed, signed, and submitted to the CCO for record keeping purposes.
- Political contributions with a value up to \$3,000 per recipient per transaction, and in aggregate up to \$5,000 per recipient over a twelve-month period are permitted if approved by both an Ormat EVP and the CCO. The Approval Form at **Annex A** must be completed, signed, and submitted to the CCO for record keeping purposes.

OTHER INTERNATIONAL JURISDICTIONS:

In all international jurisdictions in which the Company operates, other than Israel and the United States, Ormat Persons are not permitted to offer or give any political contributions on behalf of Ormat using Ormat's funds, assets, personnel, property, or other company resource. Requests for an exception to this rule may be made to the CCO for consideration. Local law in other jurisdictions may apply.

4. LOBBYING ACTIVITY ON BEHALF OF ORMAT

Laws of some jurisdictions require registration and reporting by anyone who engages in a lobbying activity. Generally, lobbying includes:

- communicating with any member or employee of a legislative branch of government for the purpose of influencing legislation;
- communicating with certain government officials for the purpose of influencing government action; or



- engaging in research or other activities to support or prepare for such communication.

So that Ormat may comply with all relevant lobbying laws, employees must notify the CCO before entering into any engagement with a person or firm engaged in any activity on behalf of the Company that might be considered "lobbying" as described above. Employees may not represent Ormat on policy issues except when it is part of their jobs to do so.

5. APPROVAL AND DOCUMENTATION REQUIREMENTS FOR POLITICAL CONTRIBUTIONS AND LOBBYING ACTIVITY

All political contributions permitted by this Policy must comply with the following requirements prior to giving the contribution:

- All political contributions must have proper documentation, including a written request to the applicable EVP and/or the CCO, which identifies the purpose, contributor, recipient, amount, and method of payment of the political contribution. See intake form at **Annex A**.
- All proposed agreements with persons or firms engaged in lobbying activity on Ormat's behalf must be submitted to the CCO for a due diligence review prior to execution of the agreement.
- All political contributions must be properly recorded in Ormat's books and records (including a receipt, invoice, or canceled check) in the relevant OMS tasks and accounts in the Oracle system.

6. EMPLOYEE POLITICAL CONTRIBUTIONS AND OTHER ACTIVITY

Ormat generally encourages its employees to take an active interest in fostering the principles of good government in the communities in which they live and work, including through participation in political activities if they so choose.

Therefore, notwithstanding the foregoing, employees may make personal political contributions and participate in political activities of their own choosing during non-work hours, provided that such contributions and activities only occur in an individual and private capacity and not on Ormat's behalf or time, or while using Ormat's funds, assets, personnel, property, or other company resources. Ormat will not reimburse any employee in any way for time or funds used for personal political contributions or activities. Any employee's personal political contributions or activities must additionally comply with the ABAC Policy.



7. CONDUCT NOT PROHIBITED BY THIS POLICY

This policy is not intended to restrict communications or actions protected or required by state or federal law.

8. POLICY ADMINISTRATION

The CCO is responsible for all policy, guidelines, and decision-making regarding Ormat's political contributions worldwide. If you have any questions regarding this policy or questions about political activities in the workplace that are not addressed in this policy, please contact the CCO: abac.compliance@ormat.com.

REVISION HISTORY

Rev.	Date	Details	Approved by:
0	08-Sept-2021	Revised Political Contributions and Activities Policy	



ANNEX A: POLITICAL CONTRIBUTION PRE-APPROVAL FORM

Ormat Technologies, Inc. (“Ormat” or “the Company”) directors, officers, and employees (collectively, “Ormat Employees”) must use this form to disclose and obtain approval before making a political contribution.

Third parties (e.g., agents, consultants) working on behalf of Ormat are strictly prohibited from making any political contributions on behalf of Ormat.

Ormat’s Chief Compliance Officer (“CCO”) is responsible for evaluating the circumstances surrounding political contributions for potential conflicts of interest and/or the appearance of impropriety.

INSTRUCTIONS

This form must be completed by the Ormat Employee who wishes to make the political contribution and forwarded to Ormat’s CCO as far in advance as possible before making the contribution.

The form must be approved by the applicable Ormat EVP and/or Ormat’s CCO and emailed to the CCO at abac.compliance@ormat.com.

If the contribution is not approved, it is prohibited and cannot be made.

PROPOSED CONTRIBUTION REQUESTER INFORMATION

- a. Employee Name and Title:
- b. Seeking Approval For: ____ one-time payment ____ recurring payment ____ other (please describe)
 - (a) Value: _____
 - (b) Date(s): _____
 - (c) Purpose / Intended Use of Contribution:

PAYMENT DETAILS

- a. Describe how payment will be made, including:
 - 1) Payment date:
 - 2) Payment method:
- b. Is the political contribution reasonable and within normal limits?



RECIPIENT INFORMATION

Identify Entity or Candidate to Receive Political Contribution (“the Recipient”):

Recipient Name:	Office sought by Recipient, if applicable:
Election for which contribution is made, if applicable (e.g., Nevada 2022 Primary Election, etc.):	Business Address:
Telephone Number:	Facsimile number or email address:
Website:	Contact Person Name and Title:

CERTIFICATION:

I have read the statements contained above in this authorization form. The representations are true and correct to the best of my knowledge as of this date. I certify that the political contribution identified in this authorization form is not offered with the intention of influencing someone to act improperly or to influence a decision made by a Public Official.

Employee Name and Title: _____

Employee Signature: _____

Date: _____



APPROVALS

For political contributions **between \$1 and \$1,500** per recipient per transaction and **in aggregate between \$1 and \$3,000** per recipient over a twelve-month period EVP Approval is Required:

Ormat EVP Name:		
Result of Review (check one):	<input type="checkbox"/> APPROVED	<input type="checkbox"/> DENIED
Ormat EVP Signature:		Date:

For political contributions **between \$1,501 and \$3,000** per recipient per transaction, and **in aggregate between \$3,001 and \$5,000** per recipient over a twelve-month period both EVP and CCO Approval is Required:

Ormat CCO Name:		
Result of Review (check one):	<input type="checkbox"/> APPROVED	<input type="checkbox"/> DENIED
Ormat CCO Signature:		Date:

Received by [Recordkeeping Group]: _____ (Initials) (Date)