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# **INTERNAL AND EXTERNAL GRIEVANCE MECHANISM POLICY**

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NOFAR ENERGY



## Introduction

O.Y. Nofar Energy ("Nofar" or "Nofar Energy") is committed to fostering a positive and inclusive environment where all individuals feel respected, valued, and heard. To support this commitment, we have established an Internal and External Grievance Mechanism Policy. This policy provides a structured process for addressing grievances, ensuring that concerns are handled promptly, fairly, and transparently.

## Scope

This policy applies to all employees, contractors, suppliers, customers, and other stakeholders of Nofar Energy.

## Objectives

1. Provide a clear and accessible process for raising grievances.
2. Ensure grievances are addressed promptly and fairly.
3. Promote a culture of transparency and accountability.
4. Protect individuals from retaliation for raising grievances.

## Definitions

**Grievance:** A formal complaint or concern raised by an individual regarding actions or practices of Nofar Energy that are perceived as unfair, discriminatory, or in violation of policies or laws.

## Grievance Mechanism Process

### 1. Internal Grievance Mechanism

#### a. Submission of Grievance:

- Employees and internal stakeholders are encouraged to raise grievances through the internal grievance mechanism.
- Grievances can be submitted in writing, verbally, or through the online grievance submission form available on the company website

**b. Initial Review:**

- Upon receipt, the grievance will be acknowledged within 7 working days.
- The Human Resources (HR) department will conduct an initial review to determine the appropriate course of action.

**c. Investigation:**

- If necessary, a thorough investigation will be conducted by the Legal and HR departments or an appointed personal.
- The investigator will gather relevant information, conduct interviews, and review documents as needed.

**d. Resolution:**

- Based on the findings, a resolution will be proposed and communicated to the complainant.
- If the complainant is not satisfied with the resolution, they may request a further review by a senior management team.

**e. Documentation:**

- All grievances and their resolutions will be documented and maintained in a confidential file.

## 2. External Grievance Mechanism

**a. Submission of Grievance:**

External stakeholders (e.g., customers, suppliers, community members) can submit grievances via email, mail, or the online grievance submission form available on the company website.

**b. Initial Review:**

- Upon receipt, the grievance will be acknowledged within 7 working days.
- The relevant department will conduct an initial review to determine the appropriate course of action.

**c. Investigation:**

- If necessary, an investigation will be conducted by the relevant department or an appointed external investigator.
- The investigator will gather relevant information, conduct interviews, and review documents as needed.

**d. Resolution:**

- Based on the findings, a resolution will be proposed and communicated to the complainant.
- If the complainant is not satisfied with the resolution, they may request a further review by senior management.

**e. Documentation:**

All grievances and their resolutions will be documented and maintained in a confidential file.

## Confidentiality

All grievances will be handled with the utmost confidentiality. Information will only be shared with individuals directly involved in the investigation and resolution process.

## Non-Retaliation

Nofar Energy strictly prohibits retaliation against any individual who raises a grievance in good faith. Any act of retaliation will be subject to disciplinary action.

## Continuous Improvement

We are committed to continuously improving our grievance mechanisms. Feedback from employees and stakeholders will be used to enhance our processes and ensure effectiveness.

## Contact Information

For questions or concerns about this policy, or to submit a grievance, please contact Hilla Segal, Head of HR at [hilla@nofar-energy.co.il](mailto:hilla@nofar-energy.co.il)