

WHISTLEBLOWER POLICY - INFINIDAT

Infinidat Ltd. (“**Infinidat**” or the “**Company**”) together with its affiliates, is committed to the highest ethical standards in all business areas. In line with this commitment, the Compliance Committee of Infinidat has established the following Whistleblower Policy.

This Policy and the procedures detailed herewith is intended to enable individuals to raise concerns for investigation and appropriate action. With this goal in mind, consistent with the policies of the Company, Infinidat shall not retaliate or tolerate any retaliation against anyone who, in good faith, reports a concern or provides assistance to the Compliance Committee, management or any other duly authorized person or group, including any governmental, regulatory or law enforcement body, investigating a concern.

Reporting a Concern:

If you have any concerns, issues or complaints regarding: (1) accounting, financial, internal controls, and auditing matters; or (2) legal compliance or regulatory matters, you may report them to your supervisor or to the Compliance Committee.

Report of any concern may be submitted by completing [this Reporting Concerns form](#). You may choose if to make an anonymous report, and where willing to provide your name, please indicate if you wish that your identity is kept confidential. The letter or e-mail reporting a concern should contain as much specific detail as possible to allow for proper assessment. The report should be candid and include all the information that the reporter knows regarding the concern reported. To the extent possible, the report should include sufficient information to support the commencement of an investigation.

The Company may, in its reasonable discretion determine to not commence an investigation if the report contains only unspecified or broad allegations without appropriate support.

Scope of Matters Covered by These Procedures:

These procedures relate to any reportable matters including, without limitation, the following:

- (a) fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- (b) fraud or deliberate error in the recording and maintaining records of the Company;
- (c) deficiencies in or noncompliance with the Company’s internal controls;
- (d) misrepresentation or false statement to or by an officer, accountant or external auditor regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- (e) deviation from full and fair reporting of the Company’s financial condition or results of operations; and
- (f) non-compliance with applicable legal, compliance and regulatory matters.

Treatment of Concerns

Upon receipt of any report, the Compliance Committee shall make a determination, in their reasonable judgment, whether a reasonable basis exists for commencing a formal investigation. The determination will be provided to the individual who sent the report (unless it was sent on an anonymous basis) and to relevant management.

If the Compliance Committee decides that a formal investigation is warranted, it will proceed with such formal investigation. The Compliance Committee shall ensure coordination of the investigations and shall have overall responsibility for the implementation of this policy. The Compliance Committee shall have the authority to retain outside legal, accounting or other relevant expertise in any investigation, as it deems necessary to conduct the investigation.

At each meeting of the Compliance Committee, the Chief Legal Officer shall present a report containing information with respect to each report received during the quarter, whether or not the report resulted in the commencement of a formal investigation, and the status of each formal investigation.

Corrective Action

The Compliance Committee, with the input of Company management, if requested, will determine the validity of reported concerns and the appropriateness of any corrective actions. It is the responsibility of the Compliance Committee to report to the Board of Directors and to management any non-compliance with accounting, legal, compliance or regulatory requirements, and to assure that the Company takes appropriate corrective action. Directors, officers and employees that are found to have knowingly materially violated any laws, regulations or Company policies may be subject to disciplinary action.

No Retaliation

This Policy and the procedures detailed herewith is intended to enable individuals to raise Concerns for investigation and appropriate action. Infinidat shall not retaliate or tolerate any retaliation by management of the Company directly or indirectly, including encouraging retaliation by others, against anyone who, in good faith, makes a report of a concern or provides assistance to the Compliance Committee, management or any other duly authorized person or group, including any governmental, regulatory or law enforcement body, investigating a report of a concern.

Nothing in this Policy and Procedures shall limit the authority of the Company to discipline, penalize, suspend or terminate any employee for good and sufficient reasons, which reasons shall not include having in good faith made a report of a concern or provided assistance to the Compliance Committee, management or any other duly authorized person or group, including any governmental, regulatory or law enforcement body, investigating such report. A person's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the reported concerns or any ensuing investigation.

Confidentiality

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The Compliance Committee shall take reasonable steps necessary to protect the identity of any person making a report of a concern so as to prevent any officer, employee, contractor, sub-contractor or agent from being in a position to take any retaliatory action against such person making such report, including encouraging others to take retaliatory action. In no event will information be released to persons without a specific need to know about the report.

Retention of Complaints and Documents

The Compliance Committee will maintain a log of all reports, tracking their receipt, investigation and resolution. All reports will remain confidential to the extent possible. All documents relating to the reports and the investigations shall be maintained for a minimum of seven years.

Date of Most Recent Board Consideration

This revised Whistleblower Policy was approved by the Board on May 2, 2023.