

This document constitutes an unofficial translation of the Company's original Hebrew report dated August 17, 2025 (reference: 2025-01-060907) (the "Report"). The Hebrew version of the Report is the binding version. This translation was prepared for convenience purposes only.

Energix - Renewable Energies Ltd. ("the Company")

Ramat-Gan, August 18, 2025

To:

Israel Securities Authority

www.isa.gov.il

To:

The Tel Aviv Stock Exchange Ltd. www.tase.co.il

<u>Subject: Federal Regulations Issued Updating the "Beginning of Construction" Definition for the Purpose of ITC Tax Benefit Eligibility under the "One Big Beautiful Bill"</u>

Further to the Company's immediate report dated July 6, 2025 (Reference No. 2025-01-048842), regarding the adoption of the federal legislation known as the "One Big Beautiful Bill" ("**OBBB**"), which effect the eligibility of the Investment Tax Credit (ITC) benefit to the Company's operations in the United States, and to the updates included in the Company's Q2 2025 Financial Statements published on August 11, 2025 (Reference No. 2025-01-059264)¹, the Company hereby announces the following:

Pursuant to the Presidential Executive Order issued by U.S. President Donald Trump on July 8, 2025 (following the enactment of the OBBB), new regulations were issued on August 15, 2025, effective from September 2, 2025, which update the definition of the term "Beginning of Construction" with respect to projects being developed by the Company. This definition constitutes one of the mandatory conditions for applying the Safe Harbor protection to preserve the ITC tax benefit rates that were in effect prior to the enactment of the OBBB ("the Regulations").

Based on public information and initial legal advice received by the Company as of the date of this report, the updated definition of "Beginning of Construction" under the Regulations continues to include two of the three components that were in effect prior to the publication of the Regulations: (i) commencement of significant on-site construction activities; and (ii) commencement of substantial off-site activities – referred to as "MPT", which are typically characterized by the procurement of equipment that is specific to the project or has long lead times. In addition, the Regulations are not retroactive. Accordingly, the third component currently included in the definition of "beginning of construction" which relates to the purchase of equipment for a project representing at least 5% of the total project cost, will remain in effect until September 2, 2025. It is emphasized that until that date, no changes will apply to the regulatory status in the United States with respect to the above.

In light of the above, the Company estimates that the Regulations will not have a material impact on its assessment regarding the lack of material effect of the adoption of OBBB on its future operations in the United States and its business plans through the end of 2030 even following the publication of the Regulations. This assessment is based on projects expected to reach commercial operation by December 31, 2027, and actions taken and/or planned to be taken by the Company, to apply the Safe Harbor protection to projects to be developed under the OBBB and the Regulations. As of the date of the report, the Company estimates that it has secured ITC tax benefit eligibility for projects to be developed through 2028, with an aggregate capacity of ~2.4GWp.

¹ Section 2.3I of Part A – Board of Directors' Report, included in the Company's Q2 2025 Financial Statements, as published on August 11, 2025 (Reference No. 2025-01-059264).



Furthermore, it is clarified that as of the date of this report, no new regulations have been issued regarding the procurement of equipment from Foreign Entities of Concern (FEOC), which may include additional provisions aimed at limiting ITC tax benefit eligibility. The Company estimates that, since the majority of equipment used in its U.S. operations is manufactured in the United States or in countries not classified as FEOC, such regulations are not expected to have a material impact on the Company, if any.

For further details regarding the Company's operations in the United States in the photovoltaic and storage sectors (including the use of the ITC tax benefit), see Sections 7.1(c) and 7.3 of Part A of the Company's Annual Report dated March 3, 2025, as amended on March 9, 2025 (Reference No. 2025-01-015516), and Section 5.1 of the Board of Directors' Report published as part of the Company's Q2 2025 Financial Statements, published on August 11, 2025 (Reference No. 2025-01-059264).

Disclaimer and Forward-Looking statement:

It is clarified that the Company is still reviewing the Regulations together with the Law and their potential effects on the Company, and therefore the above description may be updated and adjusted. Furthermore, the information detailed above regarding the provisions of the Law, the Regulations and their effects on the Company, including the Company's ability to apply the Safe Harbor protection and maintain eligibility for future ITC tax benefits, the actual realization of such tax benefits, the capacities the Company intends to develop in the United States, and the expected timelines, is based on public information published with respect to the Law and the Regulations, IRS regulations, and the Company's estimates as of the date of this report. Such information constitutes forward-looking statement pursuant to Section 32A of the Securities Law, 1968, the realization of which is uncertain. Such information may not materialize or may materialize substantially different from what is described above, depending on additional legislative amendments and binding guidelines issued under such legislation, the execution of equipment purchases required to preserve the tax benefit, the actual development of projects with the stated capacities, the Company's compliance with the conditions prescribed by law and the Regulations for eligibility for the tax benefit, as well as other risk factors that may affect the Company's operations, all as detailed in the Company's 2024 Annual Report dated March 3, 2025, as amended on March 9, 2025 (Reference No. 2025-01-015516).

Sincerely, Energix - Renewable Energies Ltd.

By:

Mr. Asa Levinger, CEO

Ms. Dafna Reznick, EVP Legal