

SOLAREEDGE TECHNOLOGIES, INC.

INSIDER TRADING POLICY

(revised by the Board of Directors,

November 18, 2020)

I. INTRODUCTION

Federal and state laws prohibit buying, selling or making other transfers of securities by persons who have material information that is not generally known or available to the public. These laws also prohibit persons with such material nonpublic information from disclosing this information to others who trade. SolarEdge Technologies, Inc. (together with its subsidiaries, the “Company”) has adopted the following policy (this “Policy”) regarding trading in securities by insiders (as defined below) who have Material Nonpublic Information (as defined below).

II. COVERED PARTIES

This Policy covers officers, directors, and all other employees of, or consultants or contractors to, the Company or its subsidiaries, as well as their immediate families, and members of their households other than household employees (“Insider(s)”). You are responsible for seeing that you do not violate United States federal or state securities laws or this Policy. We designed this Policy to promote compliance with the federal securities laws and to protect the Company and you from the serious liabilities and penalties that can result from violations of these laws.

If you violate the insider trading laws, you may have to pay civil fines for up to three times the profit gained or loss avoided by such trading, as well as criminal fines. You also may have to serve a prison sentence of up to 20 years. In addition, the Company may face civil penalties as a result of your insider trading violations, as well as criminal fines.

It is important that you understand the breadth of activities that constitute illegal insider trading. This Policy sets out the Company’s policy in the area of insider trading and should be read carefully and complied with fully by all Insiders.

III. POLICIES AND PROCEDURES

A. “Material Nonpublic Information”

1. Material Information

Material information generally means information that a reasonable investor would consider important in making an investment decision to buy, hold or sell securities. Either positive or negative information may be material. Depending on the circumstances, common examples of information that may be material include:

- earnings, revenue, or similar financial information;

- unexpected financial results;
- unpublished financial reports or projections;
- extraordinary borrowing or liquidity problems;
- changes in control;
- changes in directors, senior management or auditors;
- information about current, proposed, or contemplated transactions, business plans, financial restructurings, acquisition targets or significant expansions or contractions of operations;
- changes in dividend policies or the declaration of a stock split or the proposed or contemplated issuance, redemption, or repurchase of securities;
- material defaults under agreements or actions by creditors, clients, or suppliers relating to a company's credit rating;
- information about major contracts;
- significant new product developments or innovations;
- delays in product shipments;
- purchase order information of major customers;
- the interruption of production or other aspects of a company's business as a result of an accident, fire, natural disaster, or breakdown of labor negotiations;
- major environmental incidents; and
- initiation of, or developments in, major litigation, investigations, or regulatory actions or proceedings.

United States federal and NASDAQ investigators will scrutinize a questionable trade after the fact with the benefit of hindsight, so you should always err on the side of deciding that the information is material and not trade. If you have questions regarding any specific transaction, please contact the General Counsel.

2. Nonpublic information

Nonpublic information is information that is not generally known or available to the public. We consider information to be available to the public only when:

- it has been released to the public by the Company through appropriate channels (e.g., by means of a press release or a widely disseminated statement from a senior officer); and
- enough time has elapsed to permit the investment market to absorb and evaluate the information. As a general rule, you should consider information to be nonpublic until two full trading days have lapsed following g public disclosure.

B. Trading Policy

1. You may not buy or sell a company’s securities when you have Material Nonpublic Information about that company. This policy against “insider trading” applies to trading in Company securities, as well as to trading in the securities of other companies, such as the Company’s customers and suppliers or a firm with which the Company is negotiating a major transaction.
2. You may not convey Material Nonpublic Information about the Company or another company to others. You also may not suggest that anyone purchase or sell any company’s securities while you are aware of Material Nonpublic Information about that company. These practices, known as “tipping,” also violate the U.S. securities laws and can result in the civil and criminal penalties that apply if you engage in insider trading directly, even if you do not receive any money or derive any benefit from trades made by persons to whom you passed Material Nonpublic Information. This policy against “tipping” applies to information about the Company and its securities, as well as to information about other companies. This policy does not restrict legitimate business communications on a “need to know” basis.

The foregoing restrictions apply to all Insiders. There is no exception for small transactions or transactions that may seem necessary or justifiable for independent reasons, such as the need to raise money for an emergency expenditure.

For purposes of this Policy, references to “trading” and “transactions” includes, among other things:

- purchases and sales of Company securities in public markets;
- sales of Company securities obtained through the vesting of restricted stock units granted by the Company;
- making gifts of Company securities; and
- using Company securities to secure a loan.

Insiders should consult the Office of the General Counsel if they have any questions.

C. Problematic Transactions

While Insiders are not prohibited by law from using Company securities as collateral for loans or in margin accounts or from engaging in transactions involving publicly-traded options, such as puts and calls, or other derivative securities with respect to the Company's securities, the Company discourages Insiders from such activity because, among other problems, these types of transaction (i) may result in transactions in Company securities occurring outside the Window Period (defined below) and (ii) in the case of publicly-traded options, may create and appearance of impropriety in the these types of transactions often focus on short-term and speculative interest in the Company's securities or otherwise result in individual profit arising from poor Company performance. Limit orders with brokers should not extend beyond the Window Period, and should be cancellable upon an imposition of a black-out period. Insiders interested in trading outside of the Window Period should consider adopting a 10b5-1 trading plan, as described below.

D. Unauthorized Disclosure

All Insiders must maintain the confidentiality of Company information for competitive, security and other business reasons, as well as to comply with securities laws. All information you learn about the Company or its business plans is potentially nonpublic information until it is publicly disclosed. You should treat this information as confidential and proprietary to the Company. You may not disclose it to others, such as family members, other relatives, or business or social acquaintances.

Also, legal rules govern the timing and nature of our disclosure of material information to outsiders of the public. Violation of these rules could result in substantial liability for you, the Company and its management. For this reason, we permit only specifically designated representative of the Company to discuss the Company with the news media, securities analysis, and investors. If you receive inquiries of this nature, refer them to the Chief Financial Officer.

E. When and How to Trade Company Stock

1. Overview

All Insiders are for purposes of this Policy required to comply with the restrictions set forth under Section E.1. 2. below. Directors, officers and certain other Insiders who are so designated from time to time (such officers and designated Insiders, "Restricted Employees") are for purposes of this Policy required to comply with both the restrictions set for the under 2. Window Periods and 3. Pre-clearance, below.

2. Window Periods

Insiders may only trade in Company securities from the date that is one full trading day after an earnings release to the end of business on the date that is two weeks prior to the end of each quarter (such period, the “Window Period”).

However, even if the Window Period is open, you may not trade in Company securities if you are aware of Material Nonpublic Information about the Company. In addition, if you are subject to the Company’s pre-clearance policy (described below), you must pre-clear transactions even if you initiate them when the Window Period is open.

From time to time during the Window Period, the Company may close trading due to developments (such as a significant event or transaction) that involve Material Nonpublic Information. In such cases, the General Counsel may notify particular individuals that they should not engage in any transactions involving the purchase or sale of Company securities, and should not disclose to others the fact that trading has been prohibited.

You may receive Company stock upon the vesting or restricted stock units at a time when the Window Period is closed. You may not effect open market sales of stock issued upon the vesting of restricted stock units (including same-day sales to satisfy tax withholding obligations) if the Window restrict stock units (including same-day sales to satisfy tax withholding obligations) if the Window Period is closed or you are otherwise aware of material non-public information about the Company. Generally, all pending purchase and sale orders regarding Company securities that could be executed while the Window Period is open must be cancelled before it closes.

In light of these restrictions, if you expect a need to sell Company stock at a specific time in the future, you may wish to consider entering into a prearranged Rule 10b5-1(c) trading plan, as discussed below.

3. Pre-clearance

The Company requires its directors and Restricted Employees to contact the General Counsel in advance of effecting any purchase, sale, or other trading of Company securities, and to obtain prior approval of the transaction. The pre-clearance policy applies to these people even if they are initiating a transaction while the Window Period is open.

If a transaction is approved under the pre-clearance policy, the transaction must be executed by the end of the second full trading day after the approval is obtained, but may not be executed if you acquire Material Nonpublic Information concerning the Company during that time. If a transaction is not completed within the period described above, the transaction must be approved again before it may be executed.

If a proposed transaction is not approved under the pre-clearance policy, you should refrain from initiating any transaction in Company stock, and you should not inform anyone within or outside of the Company of the restriction. Any transaction under a Rule 10b5-1 trading plan (discussed below) will not require pre-clearance at the time of the transaction.

F. Rule 10b5-1 Trading Plans

Rule 10b5-1 provides a defense from insider trading liability if trades occur pursuant to a pre-arranged trading plan that meets specified conditions. It is possible to pre-arrange trades in Company securities by entering into a written trading plan. Trading plans can be established for a single trade or a series of trades. A plan must either specify the number of securities to be bought or sold, along with the price and the date, or provide a written formula for determining this information. Alternatively, a trading plan can delegate investment discretion to a third party, such as a broker, who then makes trading decisions without further input from the person implementing the plan. Because the SEC rules on trading plans are complex, you should consult with your broker and be sure you fully understand the limitations and conditions of the rules before you establish a trading plan.

All Rule 10b5-1 trading plans must be reviewed and approved in advance by the General Counsel. The Company may require that Insiders use a standardized form of Rule 10b5-1 trading plan to cover the sale of securities issued upon vesting of restricted stock units issued under the Company's equity compensation plans.

G. Noncompliance

Anyone who fails to comply with this Policy will be subject to appropriate disciplinary action, up to and including termination of employment.

Adopted by the Board of Directors, March 2015 and revised on November 18, 2020