



Leumi UK Group Limited

Policy Statement Anti-Bribery and Corruption

Introduction

Leumi UK Group Limited (“Leumi”) is committed to the highest standards of business integrity and to conducting its business in a legal, honest and ethical way. Leumi strives to comply with the letter and spirit of applicable anti-bribery legislation in all markets and jurisdictions in which it operates, including but not limited to, ensuring full compliance with the UK Bribery Act 2010.

Bribery is the giving, offering, receiving or soliciting of a financial or other advantage in connection with the improper performance of a position of trust, or a function that is expected to be performed impartially or in good faith. A bribe may not be financial in nature and may extend to a gift, job, contract, position or unwarranted preferential treatment as well as inappropriate or disproportionate fees, commissions, compensation or loans. Corruption is the dishonest or illegal conduct by someone in a position of power for private gain.

Expectations of Third Parties

Leumi takes a zero-tolerance approach to all forms of bribery and corruption and expects the same commitment from its ‘**Third Parties**’ (those who provide services to, for and on behalf of Leumi). Third parties, including but not limited to, agents, intermediaries, introducers, contractors, suppliers and consultants, are expected to uphold and comply with this policy in the performance of their services.

Leumi expects Third Parties to:

- (1) agree to contractual clauses regarding anti-bribery and corruption when requested to do so;
- (2) exercise sound judgement as to what might be considered disproportionate, advantageous or excessive in any given situation, in particular any compensation given to gain or retain a business advantage.

Leumi will not tolerate a Third Party engaging in:

- Offering, promising, giving or approving any offer of a bribe to another person;
- Accepting, receiving, requesting, soliciting or agreeing to accept a bribe; or

- Engaging in any form of kickbacks or facilitation payments.

Leumi will not tolerate facilitation payments by Third Parties when attempting to obtain or retain a business advantage for Leumi.

Leumi will not permit Third Parties to make any contributions to a political party, candidate or campaign on Leumi's behalf. Third Parties must not make charitable donations on behalf of Leumi.

Third Parties must not offer, either personally or on behalf of Leumi, gifts and entertainment and hospitality intended to unduly influence decision making in order to gain or retain business on behalf of Leumi.

Leumi may decline or terminate a Third-Party relationship where Leumi's requirements are not met or where the risk of bribery and corruption cannot be sufficiently mitigated.