Leumi UK Group Limited

Policy Statement: Anti-Bribery and Corruption

Introduction

Leumi UK Group Limited ("Leumi UK") is committed to the highest standards of business integrity and to conducting its business in a legal, honest and ethical way. Leumi UK 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.

Our Expectations of Third Parties

Leumi UK 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 UK). 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 UK expects Third Parties to:

(1) agree to appropriate 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 UK 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

- Any form of kickbacks or facilitation payments, including when attempting to obtain or retain a business advantage for Leumi UK.

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

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

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

If you suspect a criminal offence associated with Leumi UK, please contact our Compliance Team immediately at DL-LeumiUK-Compliance@leumiuk.com.

Policy Statement: Anti-Fraud and Corporate Integrity

Leumi UK Group Limited ('Leumi UK') has a zero-tolerance approach to fraud, dishonesty, and economic crime in all its business operations. Leumi UK is fully committed to acting with integrity, transparency, and high ethical standards, and to upholding our obligations under applicable UK anti-fraud legislation, including the Economic Crime and Corporate Transparency Act 2023.

Leumi UK adopts a zero-tolerance approach to Fraud and prohibits any employee, agent, third party service providers / contractors including any brokers or introducers who perform service for or on behalf of Leumi UK from engaging in, facilitating, or turning a blind eye to fraudulent activity designed to benefit either Leumi UK, or its clients, or any related third party.

Leumi UK implements reasonable fraud prevention procedures and maintains a proportionate, risk-based fraud prevention framework tailored to its business activities. This includes periodic enterprise-wide fraud risk assessments, robust internal controls, mandatory staff training, pre-engagement due diligence on partners and suppliers, and continuous monitoring of transactions and operational workflows.

Leumi UK's Board of Directors and senior management endorse and oversee the organisation's anti-fraud policies, ensuring adequate resources, clear reporting channels, and a culture where staff feel safe to speak up, and to challenge or report suspicious behaviour.

Leumi UK encourages staff, contractors, and external stakeholders to report any suspected wrongdoing, malpractice, or fraudulent conduct through its confidential whistleblowing channels.

If you suspect any fraudulent activity or misrepresentation associated with Leumi UK, please contact our Compliance Team immediately at DL-LeumiUK-Compliance@leumiuk.com.

Policy Statement: Anti-Tax Evasion and Facilitation

Leumi UK Group Limited ('Leumi UK') maintains a zero-tolerance policy towards tax evasion and the criminal facilitation of tax evasion, whether related to UK or foreign tax laws.

Leumi UK is committed to conducting all business in an honest, transparent, and ethical manner. Leumi UK do not support, encourage, or facilitate tax evasion by its clients, employees, agents, third party service providers / contractors including any brokers or introducers who may perform services for or on behalf of Leumi UK.

In accordance with the UK Criminal Finances Act 2017, Leumi UK has implemented and updates on an ongoing basis, a risk-based compliance framework designed to prevent the criminal facilitation of tax evasion. This includes:

- Comprehensive risk assessments covering Leumi UK's client base, transaction types, and geographic operations.
- Mandatory, ongoing staff training.
- Appropriate contractual obligations for external contractors, intermediaries, and service providers.
- Robust due diligence and Know-Your-Customer (KYC) / Anti-Money Laundering (AML) screening protocols.
- Senior management governance, oversight, and independent monitoring and review of our internal controls.

All employees and associated persons are required to report any knowledge or suspicion of tax evasion or attempted facilitation immediately through Leumi UK's whistleblowing channels (please refer to the relevant section of this document for the reporting channels).

Policy Statement: Whistleblowing

Leumi UK Group Limited ('Leumi UK') is committed to the highest standards of openness, integrity, and accountability. We expect all employees, contractors, and associated third parties to maintain ethical behaviour in line with our core values and legal obligations. We encourage a 'speak-up' culture where concerns can be raised safely and without fear of reprisal.

You can raise concerns regarding suspected wrongdoing, misconduct, or malpractice, including but not limited to:

(a) a criminal offence or failure to comply with a statutory duty (e.g., financial impropriety, fraud, bribery or corruption, tax evasion etc.)
(b) breach of a legal or regulatory obligation (e.g., Anti-money laundering, Terrorist Financing, Proliferation Financing, Sanctions evasion etc.)
(c) miscarriage of justice
(d) danger to the health & safety of any individual
(e) damage to the environment
(f) sexual harassment or
(g) the deliberate concealing of information about any of the above.

Leumi UK operates a strict non-retaliation policy. Any individual who makes a genuine, in good-faith disclosure will be protected from victimisation, harassment, or disadvantage in their employment or business relationship with us. All reports are treated in strict confidence, and anonymity will be respected to the extent permitted by law.

Leumi UK provides multiple secure channels to raise a concern:

Internal disclosures:

Whistleblowing Champion:
Paul Coates – Chair of the Audit and Remuneration Committee
Email: Paul.Coates@leumiuk.com

Whistleblowing Officer:
Youval Dichovski – Head of Internal Audit
Email: Youval.Dichovski@leumiuk.com
Tel: 0207 3772 1900

Chief Risk Officer:
Darren Rix
Email: Darren.Rix@leumiuk.com
Tel: 020 3772 1526

Head of Compliance and MLRO:
Krishna Tavva
Email: Krishna.Tavva@leumiuk.com
Tel: 020 3772 1722

External disclosures:

Financial Conduct Authority
Intelligence Department (ref FCA PIDA)
12 Endeavour Square, London E20 1JN
020 7066 9200
Email: whistle@fca.org.uk
Webform: FCA Whistleblowing Online Form

Protect
The Green House, 244-254 Cambridge Heath Road, London E2 9DA
Whistleblowing Advice line: 020 3117 2520
Webform: Contact Our Advisors
Website: http://www.whistleblowing.org.uk

All reports received will be assessed promptly, independently, and discreetly by designated personnel. Where appropriate, a thorough investigation will be conducted, and feedback will be provided to the whistleblower subject to legal and confidentiality constraints.