Anti-Slavery and Anti-Human Trafficking Statement for the financial year ending 31 December 2024

This Statement:

This statement is being made pursuant to the Modern Slavery Act 2015 ("**MSA**")[1], and sets out the steps that Leumi UK Group Limited, supervised by the Financial Conduct Authority for anti-money laundering purposes only, ("**Leumi UK**") has taken and is taking to ensure that slavery and human trafficking is not taking place in any of its supply chains and in its business.

This statement constitutes Leumi UK's anti-slavery and anti-human trafficking statement for the financial year to 31 December 2024.

Leumi UK's organisational structure and business:

Leumi UK is a specialist lender offering a targeted range of corporate lending services to both UK and international clients. Its activities are focussed on asset-based lending and on real estate finance, with particular specialisms in hotel finance, and commercial, residential, and other types of property finance.

Leumi UK is a subsidiary of the Bank Leumi le-Israel B.M. group. Leumi UK had an annual turnover in its financial year ending 31 December 2024 in excess of £36 million.

Leumi UK's Supply Chain:

As a financial institution, Leumi UK's activity is office based and therefore has a supply chain that mainly includes sourcing goods and services in the following areas:

- *Facilities and office management*: for example, cleaning, catering, security and consumables;
- *Professional services*: for example, legal, valuation, recruitment, and consulting;
- *IT*: for example, the purchase of software and hardware;

Leumi UK's Policies:

Leumi UK remains committed to doing its utmost to ensure that it is not supplied by any supplier who actively engages in slavery or human trafficking. Leumi UK has a specific Anti-Slavery and Anti-Human Trafficking Policy that has been approved by the board of directors.

Furthermore:

- Leumi UK's Whistleblowing Policy states that it is committed to maintaining the highest standard of ethics, honesty, openness and accountability, and gives the opportunity for any malpractice to be reported. Leumi UK will protect all its employees from detrimental actions related to making a disclosure.
- Leumi UK's human resourcing policies ensure that all of the lender's recruitment meets the requirements of the applicable legislation.

Steps taken to date and to be taken:

No incidents that would have breached the MSA were identified in the financial year ending 2024.

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[1] It is made under section 54, part 6 of the MSA (*Transparency in supply chains etc*)

In the financial year ending 2024, Leumi UK has considered its existing suppliers and supply chain as a part of its procurement processes and on-boarding of outsourced and other third-party suppliers.

In relation to any new outsourced and third-party suppliers Leumi UK has been asking about their policies and procedures in relation to the MSA.

Leumi UK may decide not to proceed with a potential supplier if it cannot satisfy itself that the potential supplier has taken appropriate steps to monitor and mitigate risks deriving from modern slavery and human trafficking. Leumi UK takes steps to update contractual terms where possible to include appropriate MSA related provisions.

Training and Measures of Effectiveness:

Leumi UK will continue to offer its staff training to raise awareness of the MSA, and the steps that it is taking to combat modern slavery and human trafficking. Training on the MSA and related risks will be conducted periodically.

Leumi UK is still to determine what performance indicators it will use to monitor the effectiveness of the steps that it is taking to address the risks posed by modern slavery and human trafficking, given the organisation structure and supply chain as detailed in this statement.

This statement has been approved by Leumi UK's board of directors and will be reviewed and updated on an annual basis.

Michael Schiller - Chief Executive Officer

Date: 4-6-2025