

## AML Certification

To Whom It May Concern

Bank Leumi le-Israel B.M (Bank Leumi) is a bank organized under the laws of the State of Israel and headquartered at Tel Aviv, and is regulated by the Bank of Israel.

Bank Leumi conforms as follows:

- It is materially in compliance with and will continue to be materially in compliance with all applicable Israeli anti-money laundering laws and regulations (the **AML laws and regulations**), including the following:
  - Prohibition of Money Laundering Law, 2000
  - The prohibition of Money Laundering (Banking Corporations' Requirement regarding Identification, Reporting and Record-Keeping if the Prevention of Money Laundering and the Financing of Terrorism) order, 2001
  - Prohibition of the Financing of Terrorism Law, 2005; and
  - Proper Conduct of Banking Business Regulation No. 411, published by the Bank of Israel concerning the prevention of money laundering, the financing of terrorism and the identification of customers.
- It maintains an anti-money laundering (**AML**) program (the **AML Program**) consistent with the AML law and regulations. As part of its AML Program, Bank Leumi has policies, procedures and internal controls in place that are reasonably designed to detect and report irregular activity; conducts ongoing anti-money laundering training to personnel performing critical job functions; and has independent, internal auditors who review its AML Program.
- The AML Program enables it to form a reasonable belief that it knows the true identity of its customers, including all beneficial owners, and it maintains records of the information used to verify identity for a period of not less than five years, following the account closing.
- As required by law, it has designated a Chief Compliance Officer who leads a team of employees with experience in this field to oversee its AML efforts.
- To the extent that any of its customers is a current or former Politically Exposed Person (**PEP**), an immediate family member of a PEP, or a corporation, business or other entity that has been formed by or for the benefit of a PEP, it has implemented procedures for the appropriate due diligence of such customer consistent with the AML laws and regulations.
- To the extent any of its customers are banks, it has taken reasonable measures and has conducted appropriate due diligence to indicate that the customers are not shell banks.