

Name of bank / group	Date	Event description	Full name of legal entity involved (and place of incorporation and principal place of business)	Source of information	Code (See CCP2)	Jurisdiction where event occurred (e.g., where fine imposed)	Name of regulator or other authority	Amount ¹ [GBP]	Any specific observations of compiler
2009									
Bank Hapoalim B.M.	26/04/2009	The General Director of the Antitrust Authority ruled that the five largest banks in Israel, from the beginning of the 90's until 2004, exchanged information regarding banking fees, which constituted a restrictive arrangement. The ruling did not impose any financial sanctions on the bank. This ruling is a civil	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	The bank's annual reports for 31.12.2009, at p. 121 (not mentioning if any provision was made in this regard). The Antitrust Authority Website.	CON	Israel	The Antitrust Authority	-	The five banks involved submitted an appeal to the Antitrust Tribunal. In 2014 a settlement agreement was signed, under which the bank would pay a civil fine of GBP 3.52 million (NIS 21.4 million) and the ruling against it would be retracted. However, the agreement allowed the bank to use this sum for settling class actions that were filed against it based on the General Director's Ruling, and to deduct the compensation to be paid to customers

¹ These figures should be read subject to the points made under "Notes on Interpretation of the Figures", at <http://conductcosts.ccpresearchfoundation.com/notes-on-interpretation>.

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		ruling that can serve as a prima facie evidence in future legal proceedings							from the sum of the fine. See: The bank's Annual Reports for 31.12.2013, at p. 129 (without specifying the amount of the fine); Financial Media (Globes 23.6.2014)
Bank Hapoalim B.M.	08/07/2009	Pursuant to deficiencies found in the Miami branch of the bank regarding corporate governance, operational controls, and compliance with anti-money laundering regulations, a written agreement was signed between	Bank Hapoalim B.M. Miami Branch (principal place of business in Florida, USA)	The bank's annual reports for 31.12.2013, at p. 106. The Federal Reserve website	CON, OPE, AML	USA	Federal Reserve Bank of NY, Federal Reserve Bank of Atlanta, State of Florida Office of Financial Regulation	-	On 4.10.2013 the American authorities announced the termination of the agreement due to the address of the deficiencies.

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		the bank and the American financial regulators, under which the bank took upon itself to address the deficiencies and be subject to a special oversight of the American Authority.							
								Total (CC 2009): GBP 0	

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2010									
Bank Hapoalim B.M.	08/02/2010	Financial Sanction: A financial sanction was imposed on the bank for not allowing inspection of information kept in its database, contrary to section 13 of the Privacy Protection Law 1981.	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	Annual Report of the Israeli Law, Information and Technology Authority for 2010 at p. 66 (in Hebrew)	DIS, CON	Israel	The Israeli Law, Information and Technology Authority	657.74	
Bank Hapoalim B.M.	21/09/2010	Settlement: The Court approved a settlement in a class action filed against the bank, for damages caused to customers by the breaking down of the	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	The Ministry of Justice website, the Class Action Register. Class Action 2522-08	CLA, OPE	Israel	District Court	1,403,261.26	This sum includes: NIS 8 million as a refund and benefits to customers; NIS 120,000 to the plaintiffs; NIS 413,793 to the lawyers.

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		<p>bank's computer system. According to the action, the system – and the whole banking businesses - did not operate for 3 days. The bank did not inform its customers about the severity of the problem. On the contrary, it announced on the second day that the malfunction was fixed.</p>							

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Bank Hapoalim B.M.	30/12/2010	As a result of an examination performed in 2007–2008, a financial sanction was imposed for infringements of the directives under the Prohibition on Anti- Money Laundering Law. The main infringements derived from inadequate preparation, mainly in the following: 1. Failure to obtain or maintain declarations on beneficiaries in accounts. 2. Management of lawyer trust accounts for	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	Bank of Israel/ Supervision of Banks website (2.1.2011) The bank's annual reports for 31.12.2010, at p. 167.	AML	Israel	The Banking Corporations Sanctions Committee regarding the Prohibition on Money Laundering and Terror Financing.	246,653.73	

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		their clients not in accordance with the requirements of the Order. 3. Failure to report unusual activities. 4. Failure to freeze accounts for which the customers' identification particulars were not yet completed. 5. Late submission of reports to IMPA.							

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Bank Hapoalim B.M.	30/12/2010	Financial Sanction: for infringements of directives under the Prohibition on Anti- Money Laundering Law (a failure to report unusual transactions). The infringements took place in the Private International Banking Center of the Bank (Hayarkon Branch)	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	Bank of Israel/ Supervision of Banks website (31.12.2010) The bank's annual reports for 31.12.2010, at p. 167.	AML	Israel	The Banking Corporations Sanctions Committee regarding the Prohibition on Money Laundering and Terror Financing.	986,614.92	

Total (CC 2010): GBP 2,637,188

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2011									
Bank Hapoalim B.M.	31/12/2011	Financial Sanction: for unauthorized collection of "account closing fee", a fee that was not included in the bank's tariff of fees. The issue was discovered in an audit of the Banking Supervision Department, inter alia after receiving complaints from the public.	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	Report for 2011 on the Activity of the Banking Supervision Department in the Handling of Public Enquiries and Complaints, p. 19.	OPE	Israel	The Supervisor of Banks, Bank–Customer Relations Division	98,661.49	Financial Sanction of GBP 98,661 (NIS 600,000), which is adding up to the Customer Redress below.
Bank Hapoalim B.M.	31/12/2011	Customer Redress: regarding the Financial Sanction for unauthorized collection of	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	Report for 2011 on the Activity of the Banking Supervision Department in the Handling of Public Enquiries	OPE	Israel	The Supervisor of Banks, Bank–Customer Relations Division	822,179.10	Refund to customers: about GBP 822,179 (NIS 5 million), which is adding up to the Financial sanction above.

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		"account closing fee", a fee that was not included in the bank's tariff of fees. The issue was discovered in an audit of the Banking Supervision Department, inter alia after receiving complaints from the public.		and Complaints, p. 19.					
Bank Hapoalim B.M.	10/01/2011	Fine: Civil Fine for infringement of the Investment Advice Law: The bank failed to provide a report on its investment advisors, contrary to the Investment Advice Law 1995.	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	Israel Securities Authority Website (10.1.2011) Financial Media (Ynet, 10.1.2011)	DIS	Israel	Israel Securities Authority GBP 19,298	19,298.19	

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Bank Hapoalim B.M.	10/03/2011	Settlement: in a class action filed against the bank, for collecting a higher fee than permitted for the provision of account-activity-reports to customers.	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	The Ministry of Justice website, the Class Action Register Class Action 1805/09	CLA, OPE	Israel	District Court	450,373.60	This sum includes: Up to NIS 2,338,902 as a refund to customers who would demand a refund from the bank; NIS 100,000 to the plaintiffs; NIS 300,000 to the lawyers.
Bank Hapoalim B.M.	27/09/2011	Settlement: The Supreme Court approved a settlement in a class action that was filed against the bank regarding the collection of a "transaction registration fee". The bank used to collect such a fee for every transaction that was recorded in the customer's	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	The Ministry of Justice website, the Class Action Register Application for Civil Appeal 8564/09	CLA, OPE	Israel	Supreme Court	819,555.53	This sum includes: NIS 4,184,045 as reduction on fees; NIS 800,000 for the plaintiffs and lawyers; and additional undetailed amount for customers who would demand a refund from the bank;

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		account. In cases where the customer had cancelled the bank's authority to debit his account, the bank used to debit the account and then immediately credit it in the same amount. However, the bank collected "transaction registration fees" for these double transactions.							

Total (CC 2011): GBP 2,210,068

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2012									
Bank Hapoalim B.M.	18/01/2012	Settlement: The Court approved a settlement in a class action that was filed against the bank, for unauthorized collection of fees regarding the closing of an account.	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	The Ministry of Justice website, the Class Action Register Class Action 2109/09	CLA, OPE	Israel	District Court	-	unavailable/ not published
Bank Hapoalim B.M.	19/03/2012	Settlement: in a class action that was filed against the bank, for misleading and unduly collection of interest in sale transactions of foreign securities.	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	The Ministry of Justice website, the Class Action Register. Class Action 1229-02-10	CLA, DIS, OPE	Israel	Court	95,866.08	This sum includes: About NIS 500,000 to customers who would demand a refund from the bank; NIS 25,000 to the plaintiff; NIS 58,000 to the lawyers; If the amount of the refund exceeds NIS 500,000, the attorneys will be entitled to additional fee of 12% of the refund's amount.
									Total (CC 2012): GBP 95,866

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2013									
Bank Hapoalim B.M.	19/12/2013	A former chairman of the Bank was convicted for offences that he committed in 2005 while he served as a director of the Bank and handled a purchase transaction of a Turkish bank. The convictions included money laundering, damage to property, and damage to the proper conduct of banking business.	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	The bank's annual reports for 31.12.2013, at p. 130-131. Financial media (Ynet 19.12.13)	CON	Israel	State Prosecution District court	-	In 2008 the bank paid GBP 4.111 million (NIS 25 million) to settle a claim of a foreign investment fund, that was involved in the purchase transaction, and in which the convicted former Chairman had a personal interest. The chairman was sentenced for one year imprisonment and a fine of GBP 164,435 (NIS 1 million).

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Bank Hapoalim B.M.	31/12/2013	Details unavailable /not published	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	Report for 2013 on the Activity of the Banking Supervision Department in the Handling of Public Enquiries and Complaints, p. 28.	OTH	Israel	The Supervisor of Banks, Bank–Customer Relations Division	15,163.94	

Total (CC 2013): GBP 15,164

Total (CC 2009-2013): GBP 4,958,286

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Provisions and Contingent Liabilities as at 31 December 2013									
Bank Hapoalim B.M.	31/12/2013	Bank estimate of contingent liabilities	Bank Hapoalim B.M. (incorporated and principal place of business in Israel)	The bank's annual reports for 31.12.2013, p. 284, 358-361	OTH, PVN	Israel		12,497,122.37	Amount of exposure to actions filed against the bank, of which the probability of realization is estimated by the bank as "reasonably possible" and against which the bank did not make any provision: GBP 12,497,122.37 (NIS 76 million)
Total (Provisions and Contingent Liabilities as at 31 December 2013): GBP 12,497,122									
Grand Total (CC 2009-2013 + Provisions and Contingent Liabilities as at 31 December 2013): GBP 17,455,406									