

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 Leumi Le-Israel Ltd.	11/02/2009	The Company for Location and Restitution of Holocaust Victims' Assets Ltd. (Owned by the State of Israel) demanded from the bank to deliver to the Company assets of Holocaust victims held by the bank. The demand was made in accordance with the Law for Holocaust Victims' Assets (Restitution of assets to heirs and dedication to	Bank Leumi Le-Israel Ltd. (incorporated and principal place of business in Israel)	The bank's annual reports for 31.12.2009, at p. 403.	CON	Israel	The Company for Location and Restitution of Holocaust Victims' Assets Ltd. (Owned by the State of Israel)	3,288,716.41	For further developments see the details for 2011

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

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		commemoration and assistance) 2006. The bank denied most of the demand, and paid ex gratia NIS 20 million only.							
Bank Leumi Le-Israel Ltd.	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	Bank Leumi Le-Israel Ltd. (incorporated and principal place of business in Israel)	The Antitrust Authority website. The bank's annual reports for 31.12.2009, at p. 253 (not mentioning if any provision was made in this regard)	CON	Israel	The Antitrust Authority	-	The five banks involved submitted an appeal to the Antitrust Tribunal. In 2014 a settlement agreement is to be signed, under which the bank would pay a civil fine of GBP 3,518,926 (NIS 20.2 million) and the ruling against it would be retracted. However, the

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		<p>sanctions on the bank. This ruling is a civil ruling that can serve as a prima facie evidence in future legal proceedings.</p>							<p>agreement allows 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 from the sum of the fine. See: The bank's annual reports for 31.12.2013, at p. 219 (without specifying the amount of the fine). Financial Media (Globes 23.6.2014)</p>

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Bank Leumi Le-Israel Ltd.	20/07/2009	FINMA issued a reprimand against the bank based on the actions of its Geneva branch in 2007. In pursuant to a regulatory demand to receive information from the bank regarding a client who was suspected in insider trading, the bank provided incorrect information and recorded such information in its database. FINMA noted that the Bank had committed a serious infringement of	Bank Leumi (Switzerland) AG (incorporated and principal place of business in Switzerland) (fully owned by Bank Leumi Le-Israel)	FINMA website: http://www.finma.ch/e/aktuell/pages/aktuell-bank-leumi-20091012.aspx	DIS, CON	Switzerland	FINMA	-	The bank took the necessary steps to correct the infringements

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		the Swiss Federal Law on Banks and Savings Banks by (1) Failing to maintain records of securities transactions and files of its clients with discretionary asset management mandates; (2) Not having suitable organization for its business activity, particularly by failing to identify and appropriately manage the conflict of interest involving its own lawyers; (3)							

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		Voluntarily relaying incorrect information to the SFBC as part of the execution of a request for administrative assistance.							
Bank Leumi Le-Israel Ltd.	30/11/2009	Settlement: in a class action filed against the bank, for misleading regarding the interest rate paid on "rolled over" (renewed) deposits	Bank Leumi Le-Israel Ltd. (incorporated and principal place of business in Israel)	The Ministry of Justice website, the Class Action Register. Civil File 2033/00	CLA, OPE	Israel	District Court	83,862.27	This sum includes: NIS 370,000 as a compensation to regulars and a donation; NIS 70,000 to the plaintiff; NIS 70,000 to his attorney.

Total (CC 2009): GBP 3,372,579

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2010									
Bank Leumi Le-Israel Ltd.	14/04/2010	Fine: Administrative fine was imposed for the misuse of information contained in the data base of Migdal Platinum Educational Fund, contrary to the Protection of Privacy Law 1981	Bank Leumi Le-Israel Ltd. (incorporated and principal place of business in Israel)	The Israeli Law, Information and Technology Authority Annual Report for 2010, at p. 64 (in Hebrew)	SEC	Israel	The Israeli Law, Information and Technology Authority	493.31	
Bank Leumi Le-Israel Ltd.	07/09/2010	Settlement: The court approved a settlement in a class action filed against the bank, for misleading in the selling of life insurance to housing-loan borrowers	Bank Leumi Le-Israel Ltd. (incorporated and principal place of business in Israel)	Ministry of Justice, the Class Actions Register Civil File 2626/06	CLA, PPI	Israel	District Court	641,299.70	This amount includes: NIS 3.3 million as compensation to customers; NIS 100,000 for the plaintiff; NIS 500,000 for the lawyers.

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Bank Leumi Le-Israel Ltd.	07/12/2010	Financial sanction for infringement of directives under the Prohibition on Anti- Money Laundering Law (infringements of the reporting duty). The infringements were based on the Banking Supervision's examination for 2008. The main infringements were: 1.The bank's failure to record identification particulars of persons performing transactions; 2. Failure to obtain a declaration of	Arab Israel Bank Ltd. (incorporated and principal place of business in Israel) (fully owned by Bank Leumi Le-Israel)	Financial Media (Ynet 8.12.2010) Arab Israel Bank Ltd. Annual Reports for 31.12.2010, at p. 220 Bank of Israel/ Supervision of Banks website (8.12.2010)	AML	Israel	The Banking Corporations Sanctions Committee regarding the Prohibition on Money Laundering and Terror Financing	139,770.45	

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		beneficiaries in an account and holders of the controlling interest in a corporation and recording their identification particulars in the bank's database. 3. Failure to submit reports on unusual transactions by customers, or failure to submit such reports within the specified period.							

Total (CC 2010): GBP 781,563

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2011									
Bank Leumi Le-Israel Ltd.	02/03/2011	The bank was sued by the Company for Location and Restitution of Holocaust Victims' Assets Ltd. (Owned by the State of Israel) for holding Holocaust victims' assets. In a settlement agreement, that was officially approved as an arbitration judgment, the bank agreed to transfer money to the Company.	Bank Leumi Le-Israel Ltd. (incorporated and principal place of business in Israel)	Financial Media (Globes 27.3.11, Finance Walla 27.3.2011)	CON	Israel	the Company for Location and Restitution of Holocaust Victims' Assets Ltd. (Owned by the State of Israel)	17,397,309.83	This event is the continuation of the event of 2009 mentioned above The total sum imposed on the bank is NIS 130 million, including NIS 20 million that was already paid in 2009 and now equals about NIS 25 million)

Total (CC 2011): GBP 17,397,309

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2012									
Bank Leumi Le-Israel Ltd.	12/12/2012	The bank published a profit warning four days after the issuance of Liability Deeds (The issuance was executed by the bank's subsidiary – Leumi Finance Ltd.). The Securities Authority launched an administrative enforcement proceeding regarding a negligent failure to disclose information in the public offering.	Bank Leumi Le-Israel Ltd. (incorporated and principal place of business in Israel) Leumi Finance Ltd. (incorporated and principal place of business in Israel) (fully owned by Bank Leumi Le-Israel)	Israel Securities Authority, Report on the Activities of the Israel Securities Authority for 2012, at p. 22-1 The bank's annual reports for 31.12.2012, at p. 361 Financial media (The Marker 13.12.12, Globes 13.12.12)	DIS, CON	Israel	Israel Securities Authority	328,871.64	GBP 328,872 (NIS 2 million) imposed on the Bank

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Bank Leumi Le-Israel Ltd.	12/12/2012	The bank published a profit warning four days after the issuance of Liability Deeds (The issuance was executed by the bank's subsidiary – Leumi Finance Ltd.). The Securities Authority launched an administrative enforcement proceeding regarding a negligent failure to disclose information in the public offering. At the end, the Securities Authority approved an enforcement	Bank Leumi Le-Israel Ltd. (incorporated and principal place of business in Israel) Leumi Finance Ltd. (incorporated and principal place of business in Israel) (fully owned by Bank Leumi Le-Israel)	Israel Securities Authority, Report on the Activities of the Israel Securities Authority for 2012, at p. 22-1 The bank's annual reports for 31.12.2012, at p. 361 Financial media (The Marker 13.12.12, Globes 13.12.12)	DIS, CON	Israel	Israel Securities Authority	328,871.64	Plus GBP 328,872 (NIS 2 million) imposed on the Bank's subsidiary

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		arrangement under which the Bank and its subsidiary, without admitting the violation, pay a financial sanction and take steps to prevent the violations from recurring.							
Bank Leumi Le-Israel Ltd.	31/12/2012	The American tax authorities handle a criminal investigation against the bank, for allegedly assisting American customers to evade tax payment in the USA.	Bank Leumi Switzerland (incorporated and principal place of business in Switzerland) (fully owned by Bank Leumi Le-Israel Ltd.)	The Bank's annual reports for 31.12.2012, at p. 266 The Bank's annual reports for 31.12.2013, at pp. 440	CON, TAX	USA	American Internal Revenue Service (IRS)	38,806,853.69	
								Total (CC 2012): GBP 39,464,597	

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2013									
Bank Leumi Le-Israel Ltd.	31/12/2013	The American tax authorities handle a criminal investigation against the bank, for allegedly assisting American customers to evade tax payment in the USA.	Bank Leumi Switzerland (incorporated and principal place of business in Switzerland) (fully owned by Bank Leumi Le-Israel Ltd.)	The Bank's annual reports for 31.12.2013, at pp. 411, 440 Financial media (The Marker 2.4.2014)	CON, TAX,	USA	American Internal Revenue Service (IRS)	65,774,328.28	GBP 65,774,328 (NIS 400 million) costs According to the financial media (Globes 8.6.2014), the bank is going to sign an agreement with the American Authorities, under which it will pay a fine of GBP 156,214,000 (NIS 950 million) in consideration for not being indicted.
Bank Leumi Le-Israel Ltd.	25/04/2013	Settlement: The court approved a settlement in a class action filed against the bank, for	Bank Leumi Le-Israel Ltd. (incorporated and principal place of business in Israel)	Ministry of Justice, Class Actions Register Civil File 2242/08	CLA, TAX	Israel	District Court	112,579.67	This amount includes: NIS donation instead of compensation to customers; attorney fee;

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		deducting tax at source on profits in securities transactions, in amount higher than required							and remuneration for the plaintiff.
Bank Leumi Le-Israel Ltd.	31/12/2013	Details unavailable /not published	Bank Leumi Le-Israel Ltd. (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	32,959.35	

Total (CC 2013): GBP 65,919,867
Total (CC 2009-2013): GBP 126,935,916

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Provisions and Contingent Liabilities as at 31 December 2013									
Bank Leumi Le-Israel Ltd.	31/12/2013	The American tax authorities handle a criminal investigation against the bank, for allegedly assisting American customers to evade tax payment in the USA.	Bank Leumi Switzerland (incorporated and principal place of business in Switzerland) (fully owned by Bank Leumi Le-Israel Ltd.)	The Bank's annual reports for 31.12.2013, at pp. 411, 440 Financial media (The Marker 2.4.2014)	CON, TAX, PVN	USA	American Internal Revenue Service (IRS)	80,573,552.14	GBP 80,573,552 (NIS 490 million) as a provision for anticipated costs According to the financial media (Globes 8.6.2014), the bank is going to sign an agreement with the American Authorities, under which it will pay a fine of GBP 156,214,000 (NIS 950 million) in consideration for not being indicted.

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Bank Leumi Le-Israel Ltd.	31/12/2013	Bank estimate of contingent liabilities	Bank Leumi Le-Israel Ltd. (incorporated and principal place of business in Israel)	The bank's annual reports for 31.12.2013, pp. 218-220, 326, 402-407	OTH, PVN	Israel		15,128,095	Amount of exposure to actions filed against the bank, of which the probability of realization is estimated by the bank as "not remote" and against which the bank did not make any provision: GBP 15,128,095 (NIS 92 million)
Total (Provisions and Contingent Liabilities as at 31 December 2013): GBP 95,701,648									
Grand Total (CC 2009-2013 + Provisions and Contingent Liabilities as at 31 December 2013): GBP 222,637,563									