

Bank Leumi USA is a New York State-chartered bank, insured by the Federal Deposit Insurance Corporation (“FDIC”) of the United States. As such, Bank Leumi USA is subject to all applicable New York State and United States (federal) laws and regulations, including the United States’ Bank Secrecy Act (“BSA”) as amended by the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (“USA PATRIOT”) Act, governing anti-money laundering compliance. Bank Leumi USA maintains extensive written policies and procedures to assure compliance with said laws, and is regularly examined for compliance by the FDIC and the New York State Banking Department, its principal regulators.

As required by law, Bank Leumi USA’s policies and procedures address anti-money laundering issues including the following:

- Customer Identification Program (“CIP”) Procedures
- Know-Your-Customer Due Diligence Procedures
- Enhanced Due Diligence Procedures for Private Banking Customers
- Enhanced Due Diligence Procedures for Foreign Correspondent relationships
- Transaction Monitoring and Reporting
- Suspicious Activity Monitoring and Reporting to United States and New York State government authorities
- Employee Training
- Independent Audit and Compliance Testing
- Designation of a BSA Officer

Bank Leumi USA is a subsidiary of Bank Leumi le-Israel Corp. which owns in excess of 99% of the shares of Bank Leumi USA.

Bank Leumi USA maintains branch offices within the United States in New York, California, Florida and Illinois.