



Prevention of corruption and bribery

This document reviews Azrieli Group's prevention of corruption and bribery policy and the actions taken by the Group to implement this policy.

Introduction:

Azrieli Group is committed to ethical, professional, correct and lawful conduct at the highest standards. The Group has a Code of Ethics which is based on our vision and values and is our "compass" for the appropriate behavior that is expected of all Group employees. We condemn any form of corruption and bribery. If any employee identifies a case of corruption or bribery at the Company, s/he must immediately report it via the relevant channels specified below.

Definition:

Corruption and bribery include a broad range of inappropriate engagements, including any receipt, offer or promise to a third party, whether public or private, directly or indirectly, of a financial, personal or any other type of benefit which is inappropriate and whose objective is to gain or retain a transaction or confer any other advantage.

Procedures and prohibitions:

Employees shall refrain from any act of corruption or bribery as defined above. The Group prohibits the giving or receipt of payments or benefits or other advantages by the Group or any employee of the Group to or from any person, representative of the State or any other entity, including to influence any business process which in such circumstances is inappropriate. It is clear and accepted that social ties exist between employees of the Group and customers or suppliers. However, care must be taken to ensure that such relationships do not result in any conflict of interest or violation of the law, or any appearance thereof.

Consulting mechanisms

Any such matter, big or small, is required to be reported in advance and in writing to the supervisor, and in the case of a director – to the Chairwoman of the Board. These reporting mechanisms are available to employees also for purposes of consulting and obtaining information on corruption and bribery, including anonymously, in addition to reporting via the ethics channel, which is managed by the Group's General Counsel and senior member of management, Adv. Nirit Zeevi.



קבוצת עזריאלי

Training:

As part of the annual training day, ethics training is provided at the Group, with emphasis being placed on the avenues for reporting on any ethical dilemma or breach that is identified by employees. This training also covers, from time to time, the issue of prevention of corruption and bribery, and gives employees the tools to identify cases of corruption and bribery, and the response strategies and reporting channels for such cases.

Risk management:

The Group has an internal whistleblower procedure intended to address risks of internal fraud, external fraud, corruption and bribery at the Group and allow employees to anonymously and safely report such cases. The procedure defines the method for reporting and investigating employee complaints of violations of law in incidents such as internal and external fraud. The procedure includes arrangements for the protection of employees who report breaches of law, offenses and violations of integrity or acts of corruption. All of the Group's employees receive the whistleblower procedure together with their employment agreement.

Audits:

The audit reports prepared by the Company's internal auditor also cover aspects of internal and external fraud, subject to the issue under review.

This policy document was approved by senior management on year 2024. This document shall be updated from time to time, as needed, and is available to the general public on the Group's website and to the Group's employees on our intranet.

Further information may be found in the Group's Code of Ethics.

Contact us with any request or claim through any one of the customer service channels [online](#) or by calling 03-6081300.