



# Limor Brothers' Ethical Code

August 2019

VALUE	SECTION	DESCRIPTION
Integrity Means being honest and virtuous	Avoiding conflicts of interest	Conflicts of interest occur when we prioritize personal, social, financial or political interests over the interests of the organization. It is the responsibility of management and employees to avoid situations that create - if only seemingly - a conflict of interest between them and the organization. Whether or not during work, conflicts of interest towards Limor Brothers are prohibited.
	Prohibition of the use of insider information and the use of any non- public information	During work, we may receive essential, non-public information about the organization, its customers or its business partners. We may not provide "insider information" or "give a tip" to anyone that can profit from this information. The ban applies in all cases, no matter our place of residence and/or the place of residence of the person receiving the information. Information is considered non-public information if it's not publicly available on the accepted channels.
	Unfair competition and business intelligence	Fair conduct - It is important that the market identify us as a company with high morals and fair conduct. As such, employees are prohibited from attempting to obtain information that belongs to or concerns our competitors in illegal or unfair ways, i.e. stealing information, holding information on trade secrets obtained without the consent

		of its owners or soliciting sensitive information from former employees of other companies.
	Corruption prevention	We prohibit any bribery and corruption. Employees may not accept, offer or pay a bribe, commission or other inappropriate payment. Employees are also prohibited from exchanging anything of value in place of a transaction which may affect business decisions or lead to an unfair business advantage – even for appearance reasons.
	Political activities and contributions to government agencies	We respect the right of management and employees to participate in political activities of their choice. However, any proposal or request for donation or political activity should be referred to the CEO of the company for review and approval.
	Prohibition on money laundering	<p>Money laundering involves disguising illegal or “dirty” funds derived from criminal activity or terrorist organizations as legal or "clean".</p> <ul style="list-style-type: none"> <li>• We only conduct business with customers who are willing to disclose the origin and subsequent journey of their payment transactions.</li> <li>• We do not pay or receive payments from unapproved or illegal third-parties.</li> <li>• We do not accept cash payments unless we have received prior approval from the CEO.</li> </ul>

	Protecting human rights	
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<p>Respect</p> <p>Means respecting others, without harm and without harassment, avoiding the use of prohibited materials and maintaining workplace safety</p>	<p>Maintaining health and safety in the workplace</p>	<p>Limor Brothers takes the safety and health of its employees and the general public very seriously in all of its endeavors. The company is constantly working to improve safety by instilling a culture of workplace safety.</p> <p>We aim to prevent accidents in our work environment by strictly adhering to safety procedures. Each one of us has a responsibility to maintain a safe and healthy work environment so that we can all enjoy it.</p>
	<p>Preventing discrimination, violence, harassment, intimidation, injustice and human rights violations in the workplace</p>	<p>Violence, discrimination, intimidation and harassment in the workplace means any physical or verbal action that creates a violent, abusive, hostile, frightening, scary, or threatening work environment.</p> <ul style="list-style-type: none"> <li>● Limor Brothers prohibits all forms of violence, discrimination, intimidation and harassment, both directly and indirectly. In other words, actions or behaviors which create a threatening, hostile or offensive environment are prohibited, and we will not tolerate any such violations.</li> <li>● We avoid abusive comments or jokes, as well as the presentation of inappropriate materials – especially when they target employees based on age, gender, race, ethnicity, nationality, religion, sexual orientation, disability, etc.</li> <li>● We do not use sexually suggestive language and do not send emails containing sexual content.</li> <li>●</li> <li>●</li> <li>●</li> </ul>

		<ul style="list-style-type: none"> <li>• We encourage employees to immediately report any direct or indirect abusive, threatening or violent behavior, whether verbal or physical.</li> </ul>
	<p>Avoiding the use of banned substances; banning any form of violence in the workplace</p>	<ul style="list-style-type: none"> <li>• Employees may not own, use or sell illegal/illicit or unauthorized drugs during and/or after business hours, in all complexes, sites or facilities belonging to Limor Brothers - and outside them.</li> <li>• We prohibit violence of any kind in the workplace, including acts of violence or threats of violence to another person, which may cause harm to the organization's property or employees' property. Likewise, we prohibit any conduct that makes others feel unsafe. Any such activity is prohibited.</li> <li>• We prohibit workplace safety hazards due to drug or alcohol use. We do not bring firearms, explosives or other hazardous materials into the workspace unless we have explicit permission to do so.</li> <li>• We encourage employees to immediately report any abusive, threatening or violent behavior, both verbal and physical.</li> </ul>

<p>Collaboration means working together out of a sense of shared responsibility to achieve our</p>	<p>Support and collaboration in the workplace</p>	<p>We are committed to a collaborative, supportive work environment where our employees work together to achieve the company's goals. We allocate our resources for the benefit of the entire company. We provide support systems, tools and organizational procedures and the appropriate infrastructure to encourage company collaboration.</p>
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<p>common goal, both within the organization and in relationships with our stakeholders.</p>	<p>Engaging with business partners</p>	<p>We select the services and engagements that we suspect will lead to the long-term well-being of Limor Brothers. As such, we select our suppliers based on reputation, price, quality, supply, service, environmental attitude, ethics and business conduct.</p>
	<p>Protection of Intellectual Property by Third Parties</p>	<ul style="list-style-type: none"> <li>● We maintain the confidentiality of third-party information as if it were our information.</li> <li>● We do not use any third-party copyrighted material until we first obtain or verify the copyright owner's permission.</li> <li>● We respect the intellectual property and information of our business partners and ensure that we have the necessary authority to use them.</li> <li>● In the event that an employee is no longer employed by Limor Brothers, he/she must not disclose confidential information to a new employer. Also, the employee must not disclose confidential information of his/her previous employer to Limor Brothers.</li> </ul>
	<p>Transfer of information to the media, and to the general public</p>	<ul style="list-style-type: none"> <li>● We do not discuss the affairs of the organization with the general public or the media, unless we have been instructed to do so - subject to the Limor Brothers communication policy.</li> <li>● Employees must contact the CEO before publishing any information about the organization in any form and in the media.</li> <li>● Employees must consult with the CEO upon finding out about any event or activity that may be of interest to the media or management and before participating in any media interviews, events or</li> </ul>

		<p>meetings where there are likely to be media professionals present.</p>
	<p>Use of social networks</p>	<ul style="list-style-type: none"> <li>● We work with caution and discretion, taking into account the potential consequences of using social media.</li> <li>● We are open and honest about our relationship with Limor Brothers when this information is relevant to the topic in question.</li> <li>● When we disclose our employment at Limor Brothers, we make it clear that our ideas or opinions are personal and may not represent the Company's position on the matter.</li> <li>● We refrain from using the media and social networks as a basis for discussions about Limor Brothers' confidential and proprietary information.</li> <li>● We abide by laws and guidelines regarding marketing, product promotion and services across all social media channels sponsored by Limor Brothers.</li> </ul>