



Anti-Money Laundering Policy

Last Revised on March 24, 2021

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Taboola.com Ltd. and its affiliates and subsidiaries (“Taboola”) is committed to a comprehensive anti-money laundering (“AML”) program. It is the policy of Taboola to comply fully and completely with all applicable governmental requirements that have been designed to prohibit and prevent both actual and potential money laundering, as well as other activities that facilitate money laundering and the funding of other criminal activity.

1. Purpose

Taboola is committed to acting professionally, fairly, and with integrity in all its operations, business dealings, and relationships worldwide and in implementing and enforcing effective systems to acknowledge its zero-tolerance and the importance of preventing money laundering. This AML Policy (“Policy”) provides information and guidance on how to recognize and deal with money laundering issues.

2. Money Laundering Defined

The term money laundering is generally used to describe the activities of organized criminals converting the proceeds of crime into legitimate activities, thus hiding their true sources. Taboola is unlikely to be a prime target for money laundering, however, the size and scope of services provided is such that it is not possible to be wholly immune from the risks surrounding money laundering.

3. Scope

This Policy applies to all individuals working at all levels at Taboola, including Board members, senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, and agents (“Taboolars”).

Any transaction, no matter how seemingly insignificant, that might give rise to a violation of this Policy and/or any applicable AML laws must be reported immediately to the General Counsel.

Any Taboolar who breaches this Policy will face disciplinary action which could result in dismissal for gross misconduct. Taboola reserves the right to terminate the contractual relationship with Taboolars or business partners if they breach this Policy.

All business partners of Taboola are requested to follow the same principles and commitments regarding anti-money laundering and to adhere to the provisions of this Policy at all times while conducting business with Taboola.

4. Possible Scenarios

It is not possible to provide an exhaustive list of the ways to spot money laundering or state every scenario in which you should be suspicious. However, the following are examples of possible “indicators of suspicion” for money laundering activity:

- A. transactions which have no apparent purpose, and which make no obvious economic sense, or which are out of the ordinary range of services normally requested or are outside Taboola's core business in relation to the particular client/partner/vendor;
- B. where the client/partner/vendor refuses to provide the information requested without reasonable explanation, or refuses to proceed with a transaction when asked for further identification;
- C. where cash payment has been offered by a client; and
- D. suspiciously close ties to government officials, previous allegations of corruption or unethical behavior, or a lack of proportionality between the proposed work and fees.

Again, this list is not exhaustive. Taboolars and business partners should apply common sense in determining whether there may be other reasons for Taboola not to use a potential partner to provide the relevant services or enter into any contract with such a potential partner.

5. Reporting Violations of the Policy

Where you know or suspect that money laundering is taking or has taken place, or you become concerned that your involvement in a transaction may amount to a breach of this Policy, you must disclose this immediately to the General Counsel.

You can report any concerns or violations of the Policy on a confidential and anonymous basis to the Whistleblower Hotline by calling 1-833-370-1863 or via web portal located at <https://www.whistleblowerservices.com/tbla>.

Your report should include as much detail as possible including: (a) full details of the people and/or companies involved; (b) full details of the transaction and nature of each person's involvement in the transaction; (c) suspected type of money laundering activity or use of proceeds of crime with exact reasons as to why you are suspicious; (d) the dates of any transactions, where they were undertaken, how they were undertaken and the likely amount of money or assets involved; and (e) any other information that may help the General Counsel review the case.

All appropriate steps will be taken to protect the anonymity of anyone making such a report. Your report will be reviewed by the General Counsel with the support of the Legal Department, who will take immediate steps to investigate the report independently and confidentially, without recourse to the sender. If the matter is considered of sufficient seriousness, the General Counsel will consider appropriate further action, including informing the CEO, COO, and CFO, external legal counsel, and/or relevant third party authorities.

Taboola will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. Taboola is committed to ensuring that no one suffers any detrimental treatment as a result of their good faith reporting of their suspicion under this Policy. Detrimental treatment includes dismissal, threats, or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, inform the General Counsel immediately.

6. Communication and Training

The Senior Executive Team has overall responsibility for ensuring that this Policy complies with Taboola's legal and ethical obligations, and that everyone under control of Taboola complies with it.

The General Counsel has been given responsibility for advising employees on anti-money laundering issues, and is responsible for carrying out risk assessments, including the assessment of agents, consultants, and other business partners. Further, the General Counsel is responsible for implementing this Policy and for monitoring its use and dealing with any queries regarding its interpretation.

Management at all levels are responsible for ensuring that the individuals reporting to them are made aware of and understand this Policy and are given adequate and regular training.

Should you have any questions or queries in respect of this Policy, or if you are in any doubt as to the appropriate procedures set out under this Policy, please contact the General Counsel at **ethics@taboola.com**.