



ISRAEL SECURITIES AUTHORITY
Annual Report 2017



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The following text contains only selected chapters from the ISA annual report (2017). The translation is intended solely for the convenience of the reader, the ISA does not assume any responsibility whatsoever as to its accuracy and is not bound by its contents. For the original full Hebrew text [click here](#)

Chairwoman's Message

June 27, 2018
14 Tamuz, 5778

MK Moshe Kahlon
Minister of Finance
Ministry of Finance

MK Moshe Gafni
Chairman of the Knesset Finance Committee
Knesset

Dear Minister,

Dear MK and Committee Chairman,

Re: **Report on the Activities of the Israel Securities Authority in 2017**

In accordance with Section 14 of the Securities Law, 5728-1968, I respectfully submit to you this report on the activities of the Israel Securities Authority (hereinafter, "the ISA") in the year 2017. This report contains a review of the main activities of the ISA in 2017 in the areas of capital market regulation and development, supervision, enforcement, and in other areas in which the ISA operates. Among the ISA's numerous initiatives and the issues in which it was involved in 2017, the following significant issues should be noted at the outset:

- Conclusion of the legislative amendment that shifts the structure of ownership of the TASE to a for-profit-corporation model. In the forthcoming year I expect to conclude this significant step, which is designed to create a division between TASE members and its shareholders in order to reduce conflicts of interest in the TASE, increase its appeal, and contribute to the prosperity of the Israeli economy.
- Conclusion of the legislative amendment in the matter of a sweeping prohibition against the distribution, marketing, or trading in binary options in the territory of Israel — a prohibition that applies both to Israeli customers and to foreign residents. The binary option "industry" has caused financial damage to many individuals worldwide, and enormous harm to Israel's image. This legislative amendment is designed to address these concerns.
- Establishment of an inter-departmental committee to study the regulation of ICOs (issues of cryptocurrencies). The industry based on DLT (Distributed Ledger Technology) is an innovative sector with potential to increase the efficiency of and transform the world of finance. This sector can potentially contribute to the growth of the Israeli economy, but it represents considerable risks. The committee conducted a thorough study of the various implications of the innovations of this sector, and published a comprehensive interim report in March 2018.

- Active participation in the inter-ministerial committee that studied the establishment of a dedicated stock exchange for small and medium-sized firms. The need for an SME exchange stems from the large proportion of small and medium-sized firms that have limited access to financing, and these firms — which also include firms in the hi-tech sector — clearly prefer to raise capital through means other than the TASE. The team submitted its interim report in December 2017.
- Significant investigations were opened (such as the Bezeq case) and significant judgements were obtained (such as the judgement in the Psagot case). ISA enforcement activities, such as these, make a critical contribution to deterrence and market discipline of various market players, and help maintain the public's trust in the capital market.

It is also notable that 2017 was a successful year for the TASE. This past year, 31 IPOs were completed, trading volumes rose considerably compared to recent years. Firms' willingness to raise both equity and debt on the TASE, and the improvement in trading volumes are obviously positive indications, and I expect this trend to continue in 2018.

With a view to the future, since I assumed my position in early 2018, and in line with the ISA's continuing activities, we have been intensely studying the existing infrastructure of the market and its players, the local and global trends that are expected to become established in these markets in future years, and the regulatory adjustments that they will require.

In the forthcoming years it is my intention to lead actions that will help the Israeli capital market become an attractive, technologically advanced, competitive market for issuers and investors. To this end, I intend, among other things, to take steps to remove barriers and adjust existing regulation; adopt a global regulatory approach; promote new investment products; integrate innovation, a contemporary outlook, and technological means into the ISA's work and the work of the regulated entities; and to lead a policy of proportionate enforcement.

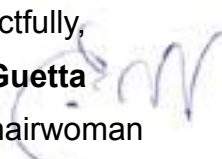
In 2018, I intend to publish a work plan that details how the ISA intends to attain these goals.

At this opportunity, I wish to thank Professor Shmuel Hauser, my predecessor in this position, who led the ISA to achievements during the years in which he served as Chair, including in 2017, the reported year. I also extend my thanks to all the employees of the ISA for their work in the past year and their contribution to the realization of the ISA's goals.

Respectfully,

Anat Guetta

ISA Chairwoman

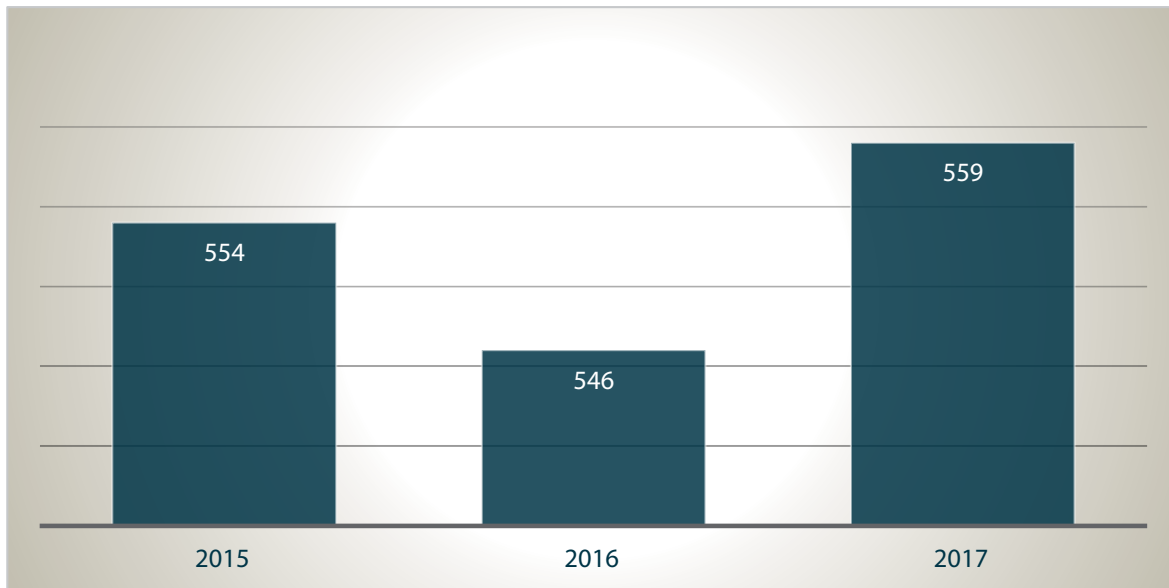


Market Data

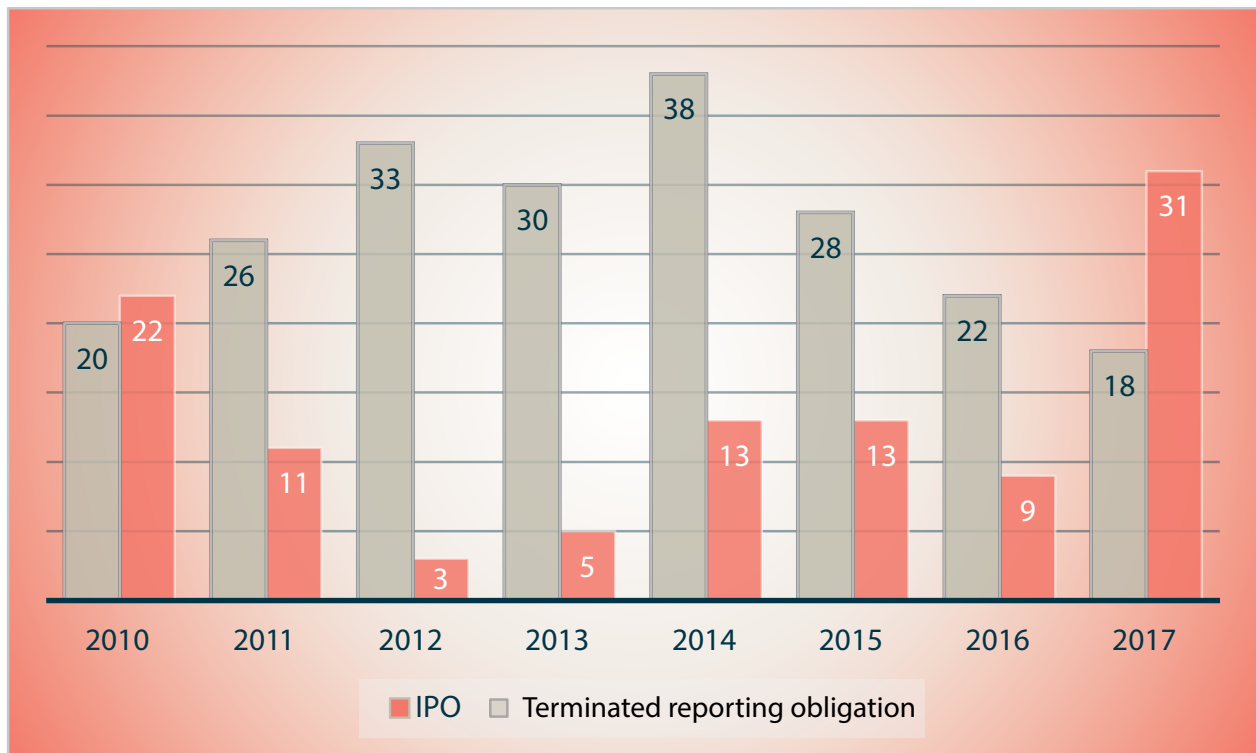
Capital raised and issues of shares 2016-2017

	2016	2017
Shares, options, and convertible bonds:		
A. Issues to the public		
Shares and options issued on the local market	2,441	7,012
Rights issues	803	820
Convertible bonds issued on the local market	1,332	574
Issues in Foreign Markets	489	747
B. Private placements		
Shares and options issued on the local market	682	2,572
Issues to employees	646	42
Convertible bonds issued on the local market	0	109
Issues in Foreign Markets	22,021	479
Convertible bonds issued in Foreign Markets	86	954
C. Options exercised		
Stock options	674	1,039
Participation unit options	177	6
Convertible bond options	24	680
Total shares, options, and convertible bonds	29,375	15,034
Bonds		
A. Public issues		
Corporate bonds	61,379	63,572
B. Private placements		
Corporate bonds	1,895	2,910
C. Institutional bonds (on Retzef, the institutional trading arena)	3,206	4,010
D. Unlisted bonds	631	834
E. Exercised bond options	0	
Total bonds	67,111	71,326
Total capital raised from the public issues and private placements	96,486	86,360

Development in the number of reporting corporations 2015-2017¹



Number of Initial Public Offerings vs. Companies that terminated their reporting obligations



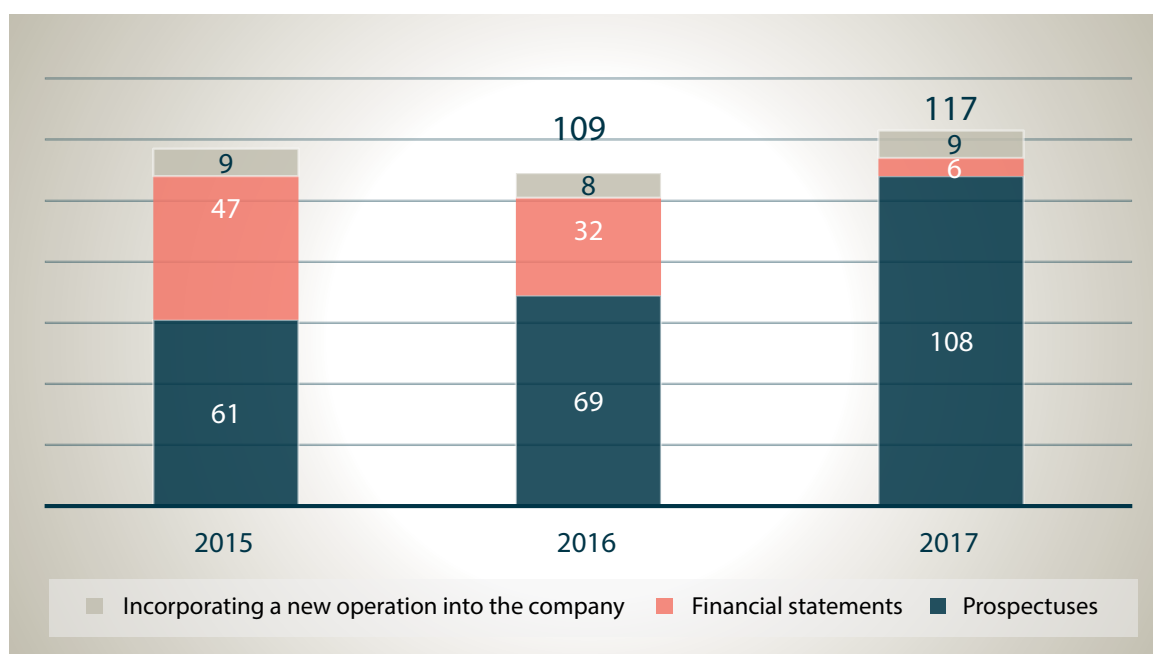
¹ Data are correct as of January 2018.

No. of applications filed and for publication of prospectus and permits issued in 2015-2017²

In 2017, 173 applications for a prospectus publication permit were filed, and 134 permits were issued, of which 89 permits for shelf prospectuses, 42 IPO³ prospectuses, and 3 ordinary prospectuses. It is evident that the number of permits for IPOs rose significantly in 2017. In 2017, 31 IPOs were completed; Of these, 17 companies issued shares for the first time (in fact, the number of companies that issued shares this year was greater than the total number of companies that issued shares in the past five years). Furthermore, 8 (unlisted) investment firms were issued in 2017. In 2017, 260 shelf offering reports were published by 160 corporations.

Prospectuses					Shelf prospectuses	
Year	No. of applications filed	No. of permits issued	Permits for IPO (% of total permits)	Permits for shelf prospectus (% of total permits)	No. of companies that offered securities according to a shelf prospectus	Total shelf offering reports
2015	131	112	21 (18%)	79 (70%)	112	171
2016	133	119	16 (13%)	95 (79%)	144	228
2017	173	134	42 (31%)	89 (66%)	160	260

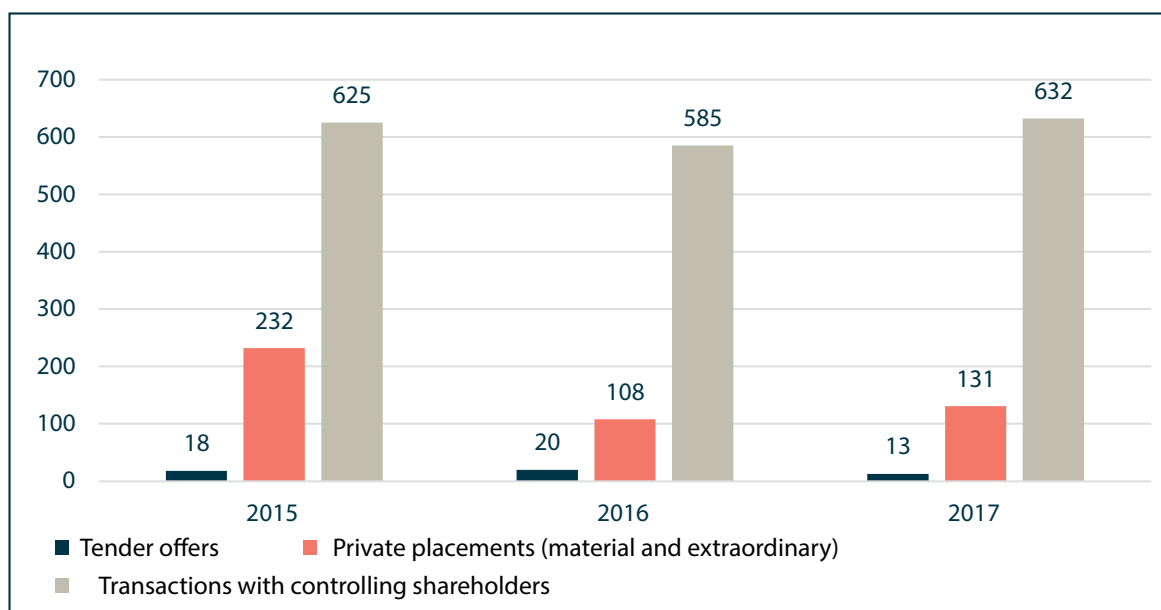
Prospectuses and financial statements full review, 2015-2017



² Data refer to prospectuses filed and prospectuses in respect of which permits were issued between February 1 of each of the years in the table and January 31 of the following year.

³ Data refer to prospectuses in respect of which a permit was issued rather than successful issuances.

Reported transactions with controlling shareholders, private placements, and tender offers 2015-2017



Debt settlements

Year	No. of companies*	Adjusted nominal value of debt under settlement** (in NIS millions)	Total adjusted nominal value of publicly-traded debt*** (in NIS millions)	Debt under settlement as % of total publicly traded debt
2017	4	838	310,529	0.27%
2016	6	5,106	291,687	1.75%
2015	7	2,056	267,821	0.77%

In 2017, four companies entered into a new debt settlement, with a total adjusted nominal debt of NIS 830 million, compared to six companies that entered into a new debt settlement in 2016, with a total adjusted nominal debt of NIS 5 billion. The difference between 2016 and 2017 values can be attributed to two companies with high amounts of debt, which entered into a debt settlement in 2016: Africa Israel Investments Ltd., with an adjusted nominal debt of NIS 3.6 billion, and Plaza Centers Ltd., with an adjusted nominal debt NIS 800 million.

* A company may appear in the table multiple times if it was involved in several settlement proceedings with bondholders of distinct series, or was involved in a second or third debt settlement after previous settlements failed. It should be clarified that the total nominal value of the debt waived by debtholders under settlements is lower than the amount noted here.

** As of the date the company entered into the debt settlement proceeding.

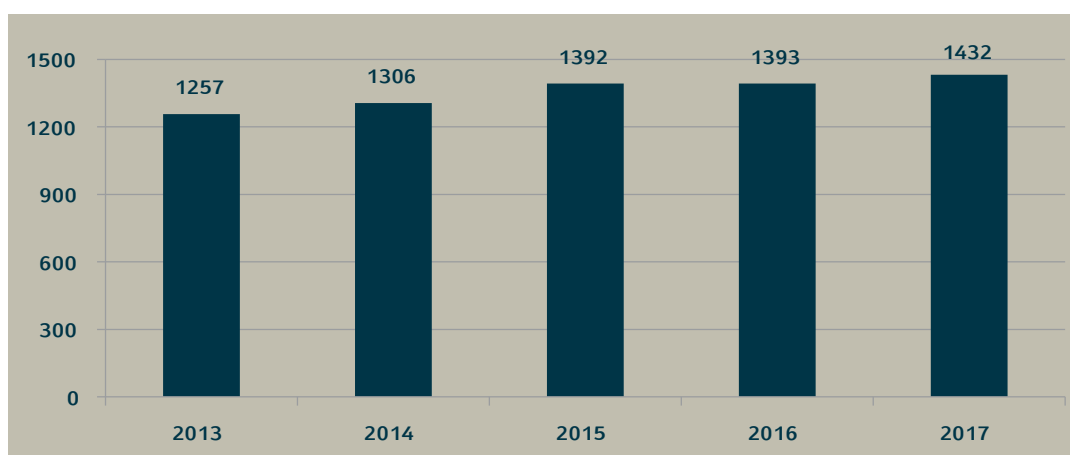
*** Corporate bonds and convertible bonds (as of year-end).

Mutual funds

A. General

At the end of 2017, the number of active mutual funds reached a record high, with 1,432 active mutual funds, including 1,430 open-end funds (compared with 1,393 at the end of 2016) and 2 closed-end funds, which are hi-tech funds that are in the progress of the public tender proceeding. In the course of the year, 181 open-end mutual funds and two closed-end funds were added, while 144 discontinued their activities, of which 124 merged with other mutual funds and the remainder were liquidated. The number of managers of active funds did not change in 2017, and at the end of the year there were 19 managers of mutual funds (note that in effect, the operations of one mutual fund manager were merged into the operations of a second mutual fund manager, and one new mutual fund manager discontinued its operations). The number of trustees of active mutual funds also remained the same: At the end of the reporting year, there were five trustees.

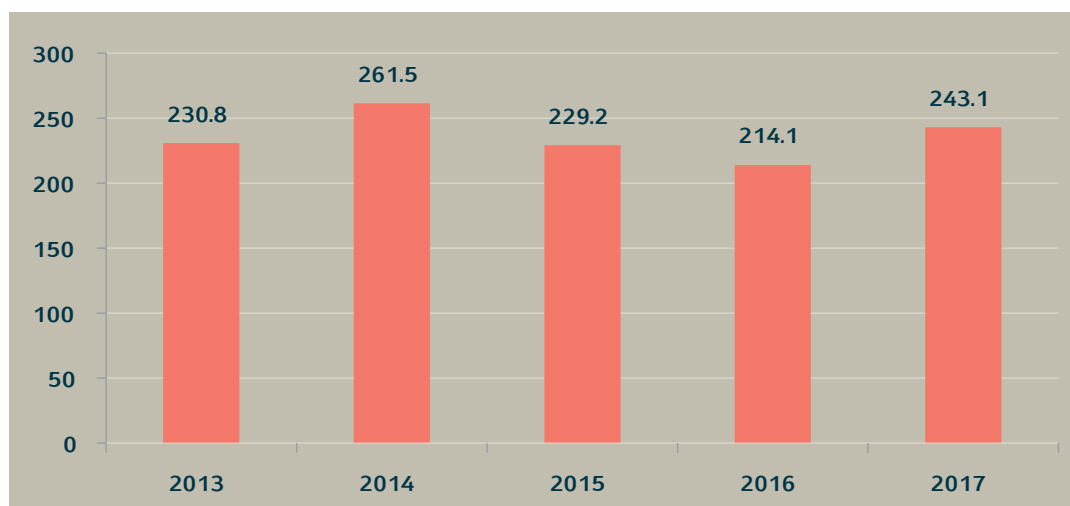
No. of mutual funds 2013-2017



Mutual fund assets

The value of assets held in mutual funds at the end of 2017 was 243.1 billion NIS, compared with 214.1 billion NIS at end 2016. The 29 billion NIS increase in mutual fund assets in 2017 stems from sales of 19.6 billion NIS and capital gains of 9.4 billion NIS.

Value of mutual fund assets as of December 31, 2013-2017 (in NIS billions)



Pursuant to the provisions of Section 73(C1)(1) of the Joint Investments Law, a mutual fund's classification must be published according to the guidelines defined by the Minister of Finance in the Regulations. The list of categories is available on the ISA website. Following are statistical data on the mutual funds, by category, including the number of funds and the value of assets in each category, as of end 2017.

Statistical data on open-end mutual funds by category, December 31, 2017

	No. of funds December 31, 2017	Asset value (in millions of NIS)	Average fund size (in millions of NIS)	% of total fund assets
Local bonds - general	376	94,985	252.62	39.1%
Local bonds – corporate and convertible	222	37,892	170.68	15.6%
Israeli government bonds	182	31,193	171.39	12.8%
Local shares	145	17,240	118.89	7.1%
Local bonds – shekel-only	119	16,899	142.01	7.0%
Money funds	29	15,418	531.65	6.3%
Foreign shares	196	14,571	74.34	6.0%
Foreign bonds	91	7,961	87.48	3.3%
Flexible	41	5,587	136.26	2.3%
Leveraged and strategic	17	642	37.76	0.3%
Fund of funds	7	365	52.17	0.2%
Foreign – general	1	231	231.12	0.1%
Local bonds – foreign-currency based	2	85	42.69	0.04%
For foreign residents only	2	30	14.97	0.01%

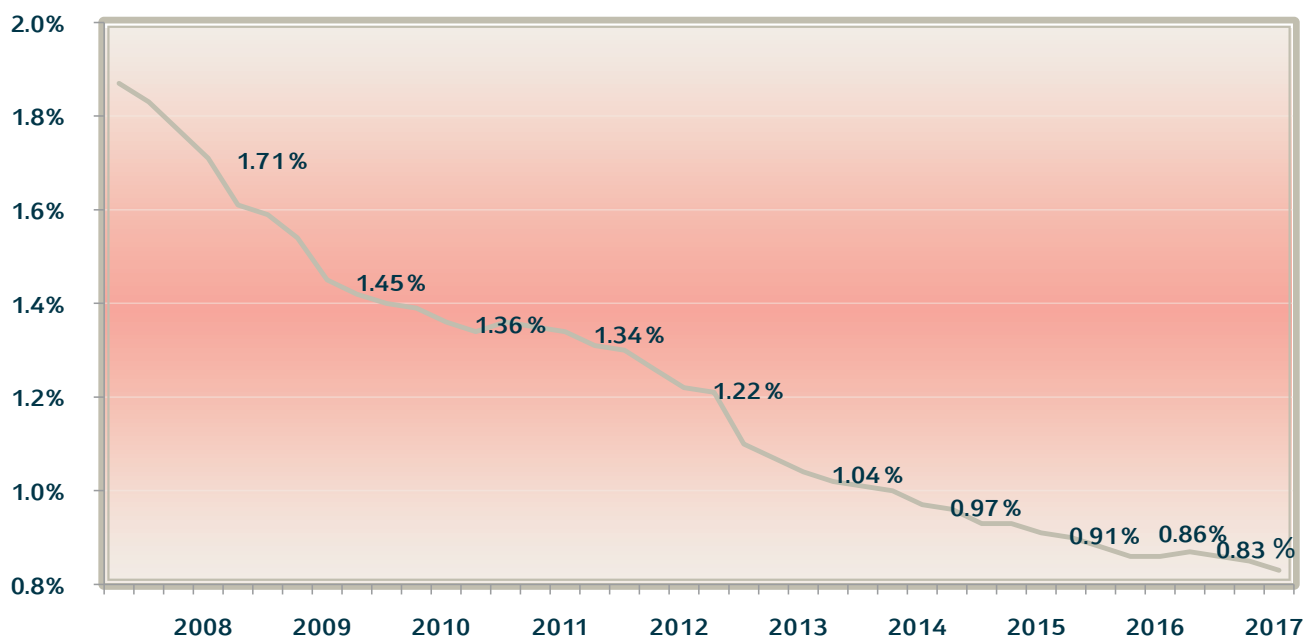
According to available data, redemptions have continued in conservative mutual funds (money funds and local shekel-based bonds), against the backdrop of a low interest environment. The "local bonds-general" category achieved the highest new mutual fund unit purchases this year and this category also currently has the highest asset value (an inflow of 23 billion NIS). Other categories that recorded an increase in managed assets include local share-based mutual funds, foreign share-based mutual funds, and flexible mutual funds (an increase of NIS 9.6 billion).

Statistical data on tracking funds 2013-2017

	No. of managers	No. of tracking funds	Value of managed assets (in billions of NIS)	New unit purchases (in billions of NIS)
2013	6	126	14.7	4.5
2014	7	159	24.5	9.2
2015	10	228	29.3	4.2
2016	9	276	27.6	-2.6
2017	7	314	29.6	-0.17

In the past two years, a trend of redemptions in the tracking funds is evident, despite the rise in their assets, which stems from capital gains.

Average mutual fund management fees (simple means) 2008-2017



Management fees in the mutual fund sector and the outline to restrict the frequency of salary hikes

Management fees in the mutual fund sector declined steadily after the Bachar Reform came into effect, and since the extensive reform in mutual funds in 2008. In the past seven years, average management fees have dropped by more than 50%. In the past three years, average management fees have dropped below than 1% (0.83% in the reported year). The continued decline in management fees is an indication of the high degree of competition in this sector.

In 2016, ISA staff drafted a uniform format for mutual fund commitments concerning changes in management fees, and the ISA will regularly publish data on the adoption or non-adoption of this

format by mutual fund managers. According to the format, mutual fund managers undertake not to increase their salary or the load charges in the fund under their management in the current calendar year. As of the reported year, all the managers of the active funds adopted the format, which implies that the salary they collected as of January 1, 2018 will remain unchanged until January 1, 2019.

Attendance in general meetings

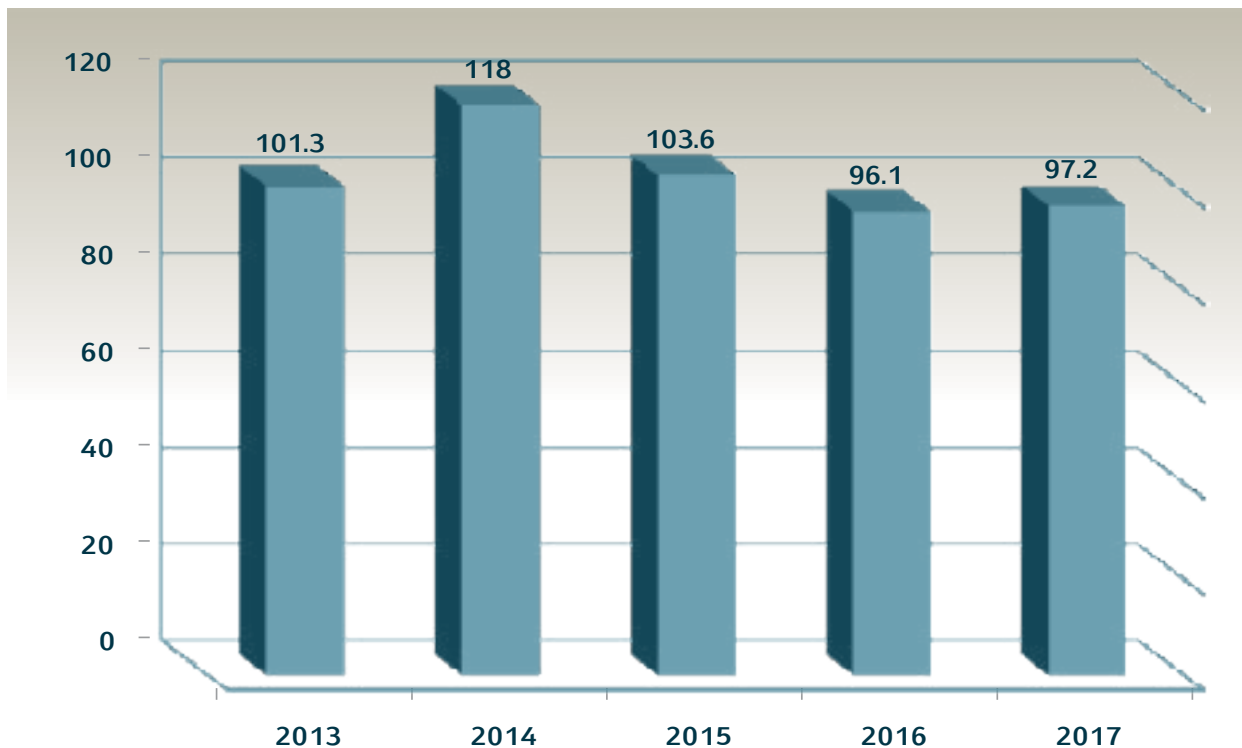
Attendance rate of mutual fund managers in general meetings in which they are obligated by law to attend and vote, 2013-2017

Year	No. of meetings	Fewer than 30% of the managers attended		Between 30% and 70% of the managers attended		More than 70% of the managers attended	
		No. of meetings	%	No. of meetings	%	No. of meetings	%
2013	880	21	2.4%	52	5.9%	807	91.7%
2014	802	4	0.5%	34	4.2%	764	95.3%
2015	662	2	0.3%	22	3.32%	638	96.3%
2016	593	24	4.05%	0	0	569	95.95%
2017	722	19	2.63%	0	0	703	97.37%

This year was also characterized by mutual fund manager's high involvement in general meetings, and more than 70% of the mutual fund managers attended and voted in more than 96% of these meetings. The regulations define the types of meetings that mutual fund managers are obligated to attend, and the decision whether or not to attend is not subject to the exclusive discretion of the fund managers.

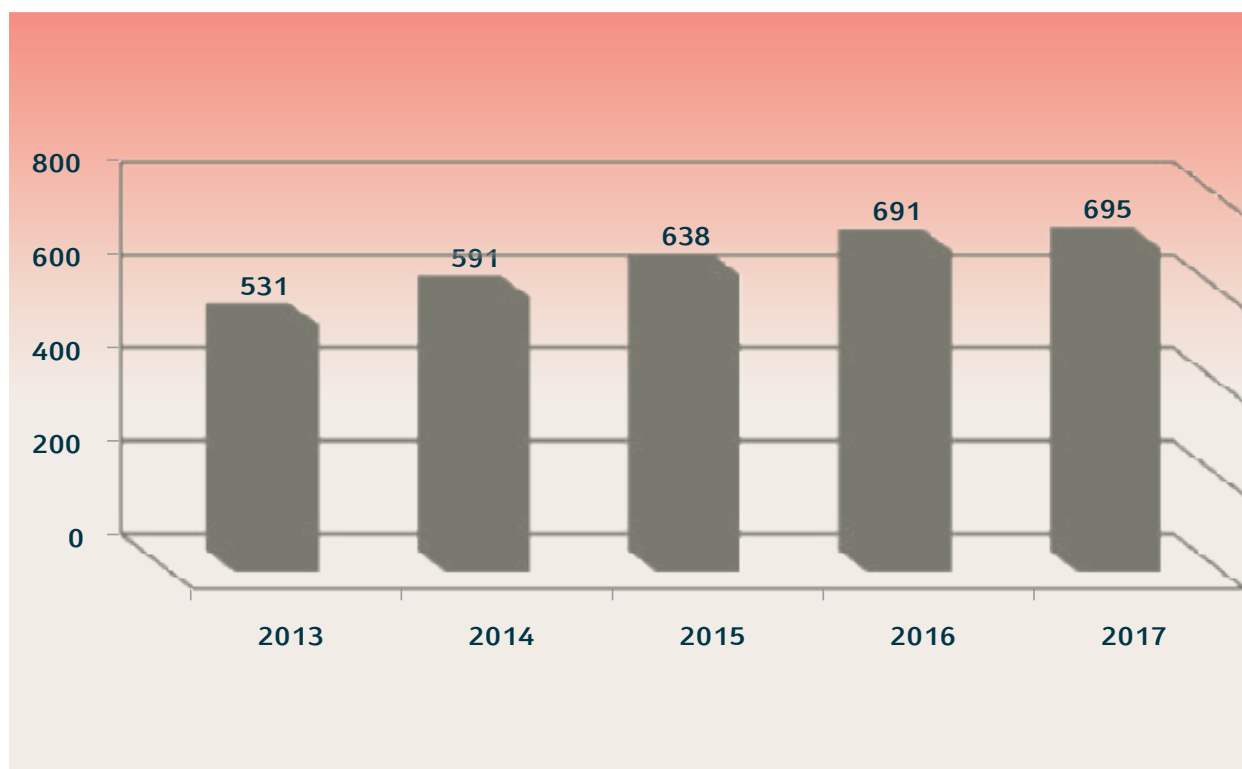
ETNs

Public holdings in ETNs, 2013-2017⁴



Four issuer groups are active in the ETN sector, and each group comprises several companies. The value of the public's holdings in ETNs as of the end of the reported year was 97.2 billion NIS, compared to 96.1 billion NIS as of end 2016, which represents an increase of 1.1 billion NIS, stemming mainly from increases in the various indices.

No. of ETN series, 2013-2017

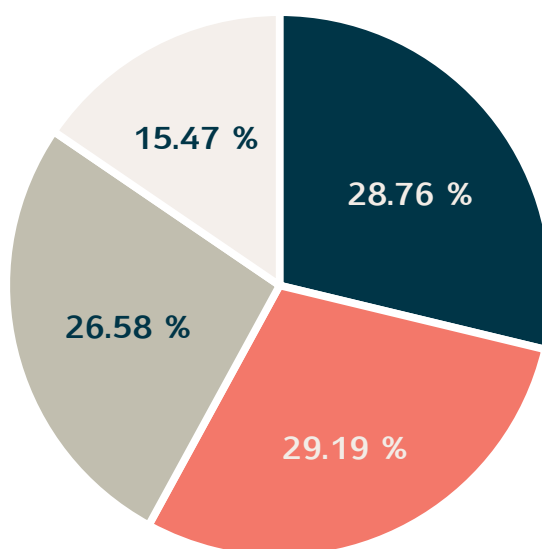


⁴ Presented net of mutual holdings.

As of end 2017, there were 695 ETN series, compared to 691 series as of end 2016. In the course of 2017, 15 new ETN series were issued and 11 ETN series were redeemed. Since 2012, the number of ETNs increased by 30% following the issue of products that track various indices in Israel and overseas.

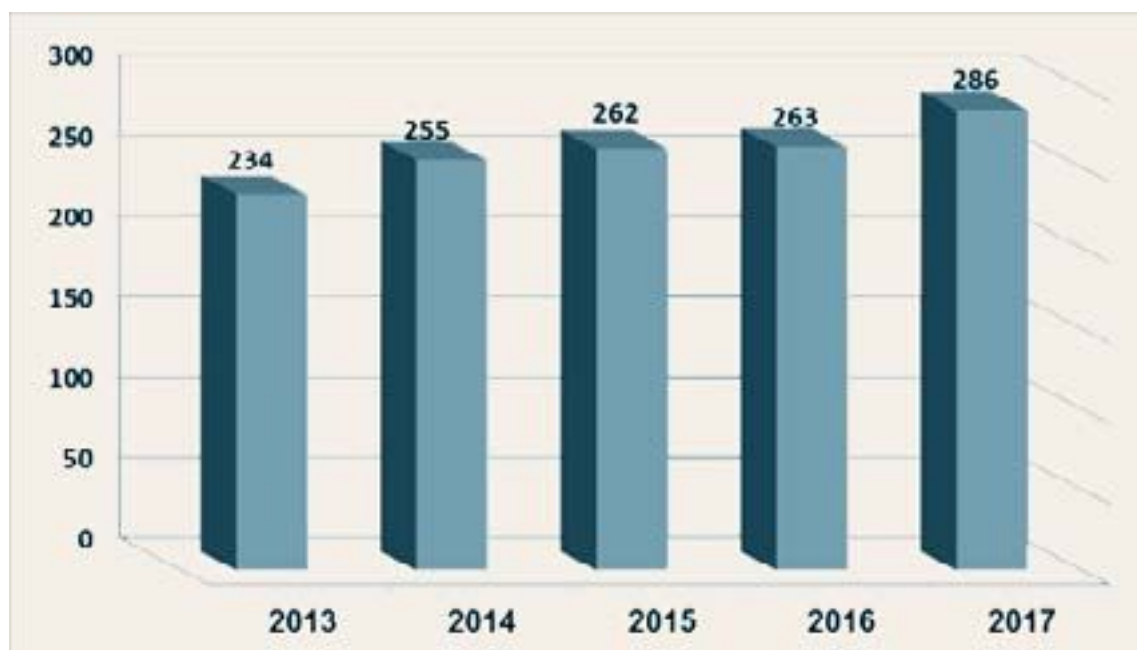
In 2017, seven new indices were approved as tracked indices for ETNs, of which two are foreign indices and five are local indices. In 2017, 19 shelf offerings were published, and these included public offers of 30 ETN series, compared to 22 shelf offerings published in 2016, which included 58 ETN series.

Market shares of the four active issuers in the ETN market



Investment advisers, investment marketers, and investment portfolio managers

Value of assets managed by portfolio management companies, 2013-2017



Value of managed assets of non-institutional investors, as of end 2017

Value of managed assets of non-institutional investors in millions of NIS	No. of companies	of total no. of % companies	of total asset % value
Under 50	32	24.80%	0.37%
50-100	16	12.80%	0.65%
100-500	40	32%	5.68%
500-1,000	11	8.80%	4.61%
1,000-5,000	17	13.60%	18.01%
Over 5,000	10	8%	70.68%
Total	126	100%	100.00%

A report that concentrates information on the investment portfolio sector is published annually and is available on the ISA website ([Hebrew Version](#)).

Total licenses issued to individuals – portfolio managers, investment advisers, and investment marketers, 2013-2017

	Portfolio managers	Investment advisers	Investment marketers
Up to 2013	2,642	7,136	1,435
2014	153	163	150
2015	139	145	132
2016	128	114	104
2017	114	139	112
Total licenses issued	3,176	7,697	1,933

As of end December 2017, 4,033 licensed professionals were active, including 820 investment portfolio managers, 2,730 investment advisers, and 483 investment marketers.

Corporate licenses granted, converted, and revoked in 2017

	Total	Portfolio management companies	Investment adviser companies	Investment marketing companies
As of December 31, 2016	162	125	15	22
Licenses granted	10	7	2	1
Licenses retired due to conversion	1	1	-	-
Revoked voluntarily	7	5	-	2
Revoked by the ISA	1	-	1	-
Added due to conversion	1	-	-	1
As of December 31, 2017	164	126	16	22

Licensing – Exams and internships

Pass rates in 2017 exams		
Subject	No. of examinees	Annual pass rate*
Securities law and professional ethics	570	43
Accounting	839	38
Statistics and finance	789	42
Economics	879	42
Professional A	1,253	51
Professional B	87	65

Licensing exams are held on two dates – in May/June and in November/December. In the reported year, 4,964 exam units were administered, compared to 5,490 exam units in 2016. Of the 3,919 examinees in 2017, 1,904 passed the exams, compared with 1,756 examinees who passed the exams out of a total of 3,861 examinees in 2016.

* Beginning in 2017, the pass rate is calculated based on the number of examinees who passed relative to the number of exam units administered (rather than the total number of examinees). Pass rates are calculated as the weighted average of the two exam sessions in each year.

Enforcement

Key statistics on investigations in the reported year

Distribution of investigation files (opened between 2013-2017) by type of offense (criminal offenses only)						
type of offense	2017	2016	2015	2014	2013	Total
Securities fraud	1	1	3	5	5	15
insider trading	1	4	3	2	3	13
Misstatements or reporting failures (in a prospectus, financial statement, immediate report, or capital raising without a prospectus)	3	4	3	2	1	13
Violations by TASE member employees and violations under the Advising Law	-	1	0.1	-	1	3
Violations under the Penal Law: bribery, theft, fraud, and obtaining by deceit	1	1	1	1	1	5
Total	6	11	11	10	11	49

Investigations, Intelligence, and Market Surveillance Department – Assistance to foreign agencies (judicial inquiries), 2013-2017						
	2017	2016	2015	2014	2013	total
Judicial inquiries	8	12	16	4	9	49

**Cases in which court determined that evidence establishes a prima facie case of a violation,
2013-2017**

Year	No. of cases in which court determined that evidence supports a prima facie case of a violation	No. of cases in which court determined that evidence does not support a prima facie case of a violation	Total
2013	10	0	10*
2014	8	2	10**
2015	9	3	12***
2016	10	1	11****
2017	10	0	10*****
total	47	6	53

**Investigation cases referred to the State Attorney, by type of main violation in each case,
2013-2017**

Violation	2017	2016	2015	2014	2013	total
Securities fraud	-	4	8	4	5	21
insider trading	1	3	2	4	2	12
Misstatements or reporting failures (in prospectus, financial statement, immediate report, or capital raising without a prospectus)	5	3	1	1	2	12
Violations under the Advising Law	1	-	-	-	-	1
Violations under the Penal Law: bribery, theft, fraud, and obtaining by deceit	1	1	2	1	-	5
Total	8	11	13	10	9	51

* Not including nine judicial inquiry cases whose findings were submitted to a foreign agency. Also not including seven administrative inquiry cases referred this year to the Chair. See separate table.

** Not including six judicial inquiry cases whose findings were submitted to a foreign agency.

*** Not including 11 judicial inquiry cases whose findings were submitted to a foreign agency

**** Not including 10 judicial inquiry cases whose findings were submitted to a foreign agency

***** Not including eight judicial inquiry cases whose findings were submitted to a foreign agency

Distribution of administrative inquiry cases referred to the Investigations Unit, by violation, 2013-2017						
Violation	2017	2016	2015	2014	2013	total
Securities fraud	-	3	3	1	2	9
insider trading	1	-	-	-	-	1
Misstatements or reporting failures (in prospectus, financial statement, immediate report, or capital raising without a prospectus)	7	3	4	8	7	29
Violations related to trading arenas, the Advising Law, and the Joint Investments in Trust Law	1	2	2	-	-	5
Total	9	8	9	9	9	44

Distribution of administrative inquiry cases referred to the Chair, by type of main violation in each case, 2013-2017						
Violation	2017	2016	2015	2014	2013	total
Securities fraud	2	3	2	-	2	9
insider trading	-	-	-	-	1	1
Misstatements or reporting failures (in prospectus, financial statement, immediate report, or capital raising without a prospectus)	4	3	6	6	4	23
Violations related to trading arenas, the Advising Law, and the Joint Investments in Trust Law	1	3	-	-	-	4
total	7	9	8	6	7	37

New Investigations Unit cases, 2013-2017 (excluding judicial inquiries)						
	2017	2016	2015	2014	2013	total
Criminal offenses	6	11	11	10	1	49
Administrative inquiries	9	8	9	9	9	44
Total	15	19	20	19	20	93

At the end of the reported year, the Investigations, Intelligence, and Market Surveillance Department had 8 investigations cases, 8 administrative inquiries, and 13 judicial inquiries pending conclusion.

Distribution of cases

Distribution of investigative cases referred to the State Attorney in 2017, by violation⁵

Violation	No.
Reporting	2
Fraud	1
Bribery	1
Theft	3
Total	7

Distribution of indictments in 2017, by violation

Violation	No.
Reporting	3
Fraud	3
Bribery	1
Insider trading	0
Theft	1
Total	8

State of State Attorney's investigation files as at end 2017, pending a decision to indict, by year of violation

year	No.
2014	1
2015	2
2016	4
2017	6

Hearings were conducted in three of the 13 cases that remained with the State Attorney. A final decision was issued on three of these cases.

⁵ According to the main offense. Occasionally a case may include securities violations and grave criminal offenses. In one case that was referred to the State Attorney in 2017, an indictment was issued in January 2018.

Investigations files handled by the State Attorney at end 2017, pending a decision to indict, by violation

Violation	No.
Reporting	3
Fraud	5
Insider trading	2
Bribery	1
Theft	2
Total	13

Administrative enforcement

In 2017, administrative proceedings were initiated in eight cases, and two cases were closed after the evidence was reviewed and an opinion advising closure of the case was drafted. The Department also managed two additional cases that had been referred to the Administrative Enforcement Committee in 2016. This year, the Department handled 13 administrative cases. Three additional cases that were referred to the Department this year are in the preparation stage.

Distribution of administrative cases opened in 2017	
Violation	
Missing / Misleading reports	4
Insider trading	1
Securities fraud (self-transactions)	1
Violations of duty of caution by fund managers	1
Offering and selling securities without a prospectus	1

Decisions of the Administrative Enforcement Committee

In this year, the Administrative Enforcement Committee issued decisions in five enforcement settlements and in three proceedings that were conducted to conclusion:

Enforcement settlements:

- A. Administrative Case 8/16 - ISA v. Terrafix Bioscience Ltd and others – [Hebrew version](#)
- B. Administrative Case 1/17 - ISA v. Insuline Medical Ltd and others – [Hebrew version](#)
- C. Administrative Case 2/17 - ISA v. Eitan Rabi – [Hebrew version](#)
- D. Administrative Case 7/17 - ISA v. Besadno Enterprise and Investments Ltd and others – [Hebrew version](#)
- E. Administrative Case 6/17 - ISA v. Speech Modules Holdings Ltd – [Hebrew version](#)

Administrative enforcement proceedings:

- A. Administrative Case 10/16 - ISA v. Ploni Almoni – [Hebrew version](#)
- B. Administrative Case 2/17 - ISA v. Ran Amitay and Cramim Capital Markets (Investment Portfolio Management) Ltd – [Hebrew version](#)
- C. Administrative Case 8/16 - ISA v. Gal Hat – [Hebrew version](#)

Monetary penalties

In 2017, the Administrative Enforcement Department considered the imposition of simple monetary penalties on regulated entities in 37 cases. Of these, monetary penalties were imposed in 12 cases, including on issues that were handled for the first time such as misstatements in reports, misleading publications concerning trading arenas, and sale of blocked certificates by ETF companies. With respect to 8 cases, the department decided not to pursue a monetary penalty proceeding, and 17 additional cases are in various stages of a monetary penalty proceeding.

Of the 12 monetary penalties imposed in 2017, 7 were imposed under the Securities Law and/or the Companies Law, two penalties were imposed under the Advising Law, and three monetary penalties were imposed under the Funds Law.

Monetary penalties imposed under the Securities Law and/or Companies Law

Violator	Amount of the penalty	Violation (article and description)
Itade Ltd.	NIS 150,000	Section 44ZG(7) of the Law and Regulation 40(A) of the trading Arenas Regulations – Misleading customers through publications on television and on the Internet
Gamatronic Electronic Industries Ltd.	NIS 35,117	Section 36 of the Securities Law and Regulation 39 of the Reporting Regulations – Late filing of financial statements for Q1/2016
The World Zionist Organization	NIS 13,500	Section 37(A0 of the Law and Regulation 33(A) of the Reporting Regulations – Failure to report holdings of interested parties
Harel Sal Ltd	NIS 375,000	Section 15 of the Law – sale of two blocked ETN series
RFX Global Trading Ltd	NIS 125,000	Regulation 74(A) of the Trading Arenas Regulations – failure to file quarterly reports for Q3/2016 and annual financial statements for 2016, as required
Levinsky Ofer Ltd	NIS 37,290	Regulation 2(B) of the Regulations of Transactions with Controlling Shareholders – Failure to report an immediate report or irregular transaction with a controlling owner
Ziron Distilleries Ltd	NIS 18,945	Section 36 of the Law and Regulation 7 of the Reporting Regulations - Late filing of financial statements for the year 2016

Monetary penalties imposed under the Advising Law

ICM investor Management Ltd	NIS 57,398	Section 17 of the Regulation of Investment Advising Law – refunds of commissions from TASE members without customers' consent
Pitango Investments Ltd	NIS 36,921	Section 17 of the Regulation of Investment Advising Law – refunds of commissions from TASE members without customers' consent

Monetary penalties imposed under the Funds Law

Alumot Trust Fund Management Ltd	NIS 64,078	Sections 59 and 61(A) of the Joint Investments in Trust Law – purchase of bonds contrary to the investment policy
Migdal Trust Funds Ltd	NIS 35,289	Section 97(B) of the Joint Investments in Trust Law – failure to report encrypted accounts.
Harel Pia Trust Funds Ltd	NIS 94,842	Section 60 of the Joint Investments in Trust Law – retrospective rather than advance confirmation of coordinated transactions