

TURNING
POTENTIAL
INTO
REALITY

Code of Ethics
REALITY GROUP





Introduction

At REALITY, ethics and values extend beyond corporate responsibility. They are an integral part of the Group's identity that shapes the course of every strategic decision, day-to-day operation, and relationships with everyone we work with. Since Reality's foundation, we have committed to the highest standards of ethics and professionalism and to acting responsibly for the benefit of our stakeholders, including investors, business partners, governmental authorities, suppliers, borrowers, our employees, the general public, and the community. In the spirit of our vision, we measure success not just through financial returns but also by the journey we undertake and the added value we contribute to the economy, society, and environment.

Beyond our duty to act legally and morally, ethical behavior is essential for maintaining our credibility and reputation in the industry, and for fostering business resilience that facilitates long-term growth. Our ethical journey is a collective endeavor, where each employee representing the Group's values, behavioral guidelines, and professional standards in their ongoing activities and interactions with others. Together, we are committed to acting with integrity and fairness to achieve our goals, behaving responsibly towards everyone around us, and building positive relationships that contribute to effective management and the success of the Group.

This Code of Ethics embodies the principles we adhere to as an organization and as individuals, guiding our actions in all matters related to values and appropriate behaviour. It establishes the rules and guidelines we follow in proper business conduct, protecting the Group's assets, fostering strong work connections, and supporting social and environmental resilience. The Code serves as a compass that helps us make better decisions consistent with the law, our work procedures, and ethical standards.

We are committed to business excellence and continuously strive to enhance the integration of this Code across all areas of our operations. The Code is a 'living document' designed to evolve and update in response to new challenges and industry changes. We encourage our team members and stakeholders to bring any ethical issues or moral dilemmas they encounter to our attention. When in doubt, we urge using good judgment and seeking guidance from the Group's Chief of People for guidance and resolution.

Scope

This Code of Ethics applies to all REALITY Group personnel across all business activities and in all countries of operation. The Code is not intended to replace or derogate from legal provisions and/or from regulatory directives that apply to REALITY Group employees, and in any case of conflict between them, the existing provisions of law shall prevail. Code guidelines shall not constitute an interpretive source for the legal provisions, and shall therefore not exempt the Group employees or detract from their obligation to comply with all provisions of law. The Code of Ethics is intended to add to the provisions of law as a tool for translating the principles into deeds, decisions and actions, which will ensure ethical conduct and positive influence over the Group and the environment.

We expect any third party acting on behalf of REALITY Group to adopt this Ethical Code's guidelines, and to appropriately represent our approach to ethical business conduct.

Reporting and Enforcement

In case of an ethical dilemma or a suspicion of code violation, please contact your direct supervisor or the Group's Chief of People for counsel and guidance on the next steps. Failure to uphold the code may result in various disciplinary and/or legal actions, in accordance with REALITY Group's procedures and the provisions of law.



Core Values

The values of Professionalism, Responsibility, Creativity, Proactivity, and Partnership are the guiding principles of every decision and action we make. They capture the essence of who we are as an organization and reflect our commitment to everyone we work with.

Partnership

Building Success Together

For us, every one of our employees, investors, colleagues, and suppliers is a true partner on our path. We believe in collaboration and work in synergy to promote shared success. We treat everyone with respect and integrity, nurturing strong relationships based on trust, communication, and mutual responsibility.

Creativity

Transforming Challenges into Opportunities

We dream big and believe that creativity and boldness have the power to push boundaries. We champion innovation and 'out of the box' thinking, integrating diverse skills and unique perspectives to reimagine possibilities and turn limitations into groundbreaking solutions.

Proactivity

Taking Action Today

We proactively engage in creating significant impact. With determination and initiative, we transform a strategic vision into an effective action plan that drives change today for a better tomorrow. The drive for exceptional breakthroughs guides our spirit, and we respond to challenges with flexibility and agility at all times.

Professionalism

Striving for Excellence

At REALITY, we always strive to go further. We build leading interdisciplinary teams working together to create the best outcomes. We manage real estate investments with the highest standards of professionalism and ethics, consistently improving our value and performance.

Responsibility

Investing Responsibly

We believe in our responsibility to shape a better future for real estate. Acting with integrity and fairness, we protect the interests of all stakeholders and make every decision with genuine care for the community and the environment.

Business Conduct

Ethical Business Conduct

REALITY and all its Personnel are committed to acting responsibly and ethically at all times. Every Partner, manager, and employee is expected to behave with integrity and honesty, treat everyone with respect and fairness, and make decisions in a lawful and ethical manner consistent with this Code of Ethics. Managers, in particular, should lead by example, serving as role models that inspire the behavior of others within the Group.

Compliance with Laws and Regulations

All staff members must comply with the legal and regulatory requirements of every territory we operate in and adhere to REALITY's professional rules, processes, and policies.

Financial Integrity

REALITY's credibility is based on our unwavering commitment to fiscal integrity. We uphold high levels of honesty and transparency, submitting detailed investor information and Financial Statements in a professional and timely manner. As stewards of assets and capital, we are dedicated to producing accurate bookkeeping and complete financial records, following the International Financial Reporting Standards (IFRS).

We respect financial laws and strictly comply with Israel's Financial Intelligence Unit (IMPA) regulations, internal controls, and audit requirements.

We are committed to complying with tax laws and regulations in every jurisdiction of operation. REALITY ensures transparency and adherence to international standards by annually disclosing CRS and FATCA reports, as mandated by law. Our tax strategy is supported by renowned external consulting agencies overseeing tax reporting, deal structuring, and compliance across all entities.

Preventing Financial Crime

The Group takes measures to prevent financial crime, including fraud, money laundering, tax evasion, and terrorist funding. Through meticulous due diligence and "Know Your Client" (KYC) procedures, we minimize the risks of financial corruption and unknowingly supporting any illicit activities.

Preventing Corruption

We condemn all forms of bribery and corruption and maintain a “zero tolerance” policy towards any improper influence over business decisions.

The nature of REALITY’s operation involves working with local authorities, government employees, public officials, and a range of business partners. We will never offer, solicit, pay or accept any direct or indirect bribery, including but not limited to payments, gifts, or other benefits from any private or public party.

Our employees will refrain from promising, giving, or receiving gifts without explicit approval from their immediate supervisor, confirming they are modest and suitable for the context.

Conflict of Interest

A conflict of interest occurs when personal interests or relationships compromise our ability to make impartial decisions for the benefit of REALITY and its stakeholders. In general, we steer clear from any considerations or actions that could compromise the integrity of the Group and promptly disclose any possible conflicts, ensuring that we always act in the best interests of our stakeholders.

A conflict of interest could also potentially emerge between the Group and its investors or within REALITY’s Funds and entities. Although such conflicts rarely occur, we have established structured governance protocols as a precautionary measure. In case a conflict of interest arises, the Fund’s Advisory Board, comprised of its major investors, will convene to represent their interests and facilitate a resolution.

Furthermore, we have defined a clear procedure to effectively reconcile disputes that may occur between the Equity and Debt Funds.

Business Protection

Safeguarding REALITY's Assets

REALITY, along with all its Partners, managers, and employees, is obligated to act in good faith for the Group's benefit. Every employee should do their best effort to safeguard the Group's interests, assets, and reputation, ensuring every interaction reflects our values and guidelines.

Protection of the Group's assets and information is crucial to maintaining our competitive advantage and commitments to stakeholders. We bear the responsibility to protect both tangible and intangible assets including, but not limited to: physical assets, equipment, resources, contracts, confidential information, investor and client lists, and property information.

Confidentiality and Privacy Protection

The foundation of REALITY's success over the years is deeply rooted in the trust of our investors, clients, business partners, governing authorities, and employees. We are firmly committed to safeguarding the privacy and confidentiality of others in accordance with all relevant data protection and information security legislation.

We diligently maintain confidentiality and protect the information entrusted to us, ensuring access to data is granted only on a 'need to know' basis to the relevant personnel. We will never disclose personal and confidential information to others or misuse access to data for private purposes.

As the business activities of REALITY involve collaborations with investment partners, contractors, external advisors, and others, any release of information and documents to third parties is governed by confidentiality agreements.

Information Security

Evolving information security regulations and the rise of cyber threats require us to continuously monitor and update the technology and protocols we use to protect our data and operating systems. As a result, we have aligned our IT system with the ISO 27001 standard and engaged with external services to enhance our cybersecurity measures against future risks.

We uphold transparency in our data protection practices and will inform our stakeholders should a potential breach occur.

People and Relationships

Workplace environment

Our team is our greatest asset. The Group's performance relies on their skills, expertise, and dedication; therefore, we foster a positive work environment that supports their personal and professional development goals.

We nurture a safe and healthy workplace that respects employees' rights and personal lives, creating a space where everyone feels valued and respected. Open communication is integral to our culture, and we encourage our team members to share their ideas, concerns, and feelings in a setting that values honesty, initiative, and collaboration.

At REALITY, we share a mutual goal with our employees to unlock their full potential. We invest in our workforce's future by offering personalized professional development plans, comprehensive training programs, and career advancement opportunities. As part of our commitment to employee welfare, we provide all staff members access to private health insurance and activities that support their well-being.

Inclusion, Discrimination and Harassment

REALITY is committed to respecting human rights in all aspects of our operations and condemns any form of discrimination or harassment.

The Group provides everyone with equal opportunities regardless of race, ethnic background, religion, identity, sex, age, disabilities, military service, or any other criteria specified by law.

We encourage diversity and welcome different backgrounds that amplify our inclusive culture. We believe a wide spectrum of expertise and unique career paths broaden our perspective and lead to better outcomes.

REALITY ensures a safe and secure work environment free of any kind of bullying, violence, and harassment. We will not tolerate any form of sexual harassment and expect all team members to act in accordance with the Prevention of Sexual Harassment Law, as well as the Group's Policy. Beyond its legal prohibition, such behavior contradicts the collaborative and supportive atmosphere we strive to cultivate.

Business Relationships

Our relationships with investors, business partners, suppliers, borrowers, local authorities, and other stakeholders are paramount at REALITY. We recognize each as a vital link in the network that supports our mission and long-term growth. Therefore, we carefully select anyone we associate with, ensuring they share commitment to ethical conduct and business excellence.

We build and sustain long-lasting relationships based on trust, integrity, and open communication. We honor our commitments and agreements and treat everyone with dignity, respect, and fairness.

Investors

We appreciate our investors and respect their right to make informed decisions that best protect their interests. REALITY fosters open dialogue through multiple communication channels, ensuring we actively listen and adapt based on our investors' feedback.

We provide access to clear, accurate, and up-to-date investor information and respond to specific requests in an effective and timely manner. All relevant investment documents, including Financial Statements, general reports, account balances, and tax-related information for annual reporting, are available to investors at all times via our secure Investor Portal. In addition, we ensure investors are well-informed of ongoing updates and report every asset acquisition and realization.

All Funds annual consolidated Financial Statements are released within 90 days following the close of the fiscal year. In alignment with the reporting requirements of our public investors, REALITY's Equity and Debt Funds disclose quarterly interim Financial Statements within 60 days following the end of each quarter.

Suppliers

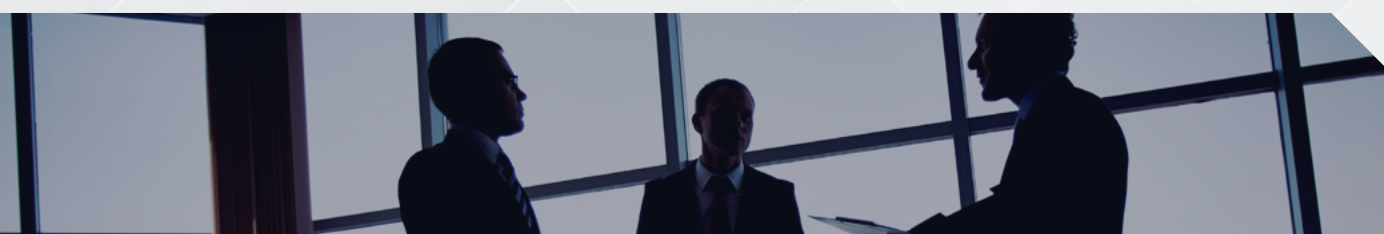
We deeply value our suppliers and service providers, acknowledging their significant contributions to our business success. Their achievements amplify our own, driving us to pursue collective success.

The selection of suppliers is based solely on professional considerations and quality of products and services provided. REALITY maintains a Net 30 End of Month payment policy, ensuring invoices are processed within a reasonable timeframe and paid within 30 days following invoice approval.

Borrowers

REALITY DEBT offers a customer-focused approach, ensuring borrowers experience a professional, reliable, and fair process from application to final settlement. To better serve the real estate industry, we offer developers flexible financing solutions tailored to their specific needs.

We maintain clear and honest communication, providing borrowers with all the necessary information in a comprehensive, accurate, and accessible manner. Striving to deliver superior service to our customers, we offer professional and approachable support backed by our extensive industry knowledge and experience.



Social and Environmental Protection

Commitment to Sustainable Practices

We care about the environment and recognize our responsibility to promote sustainable development that contributes to healthy urban landscapes and quality of life around our assets. Beyond adhering to relevant environmental laws and regulations in all areas of operation, we acknowledge sustainability as a critical factor in the development of future cities and in maintaining the long-term value and resilience of our investments.

In line with REALITY's ESG Policy, we gradually integrate sustainability considerations into our value-add strategies and decision-making processes. We identify opportunities for sustainable development, including eco-friendly construction, energy efficiency, green financing, and environmental initiatives. As part of our efforts to reduce the carbon footprint across our operations, REALITY increases awareness of sustainability principles among its employees, tenants, and other stakeholders.

We continuously improve our performance, monitoring, and reporting practices, aligning with investors' expectations, global industry standards, and evolving regulations.

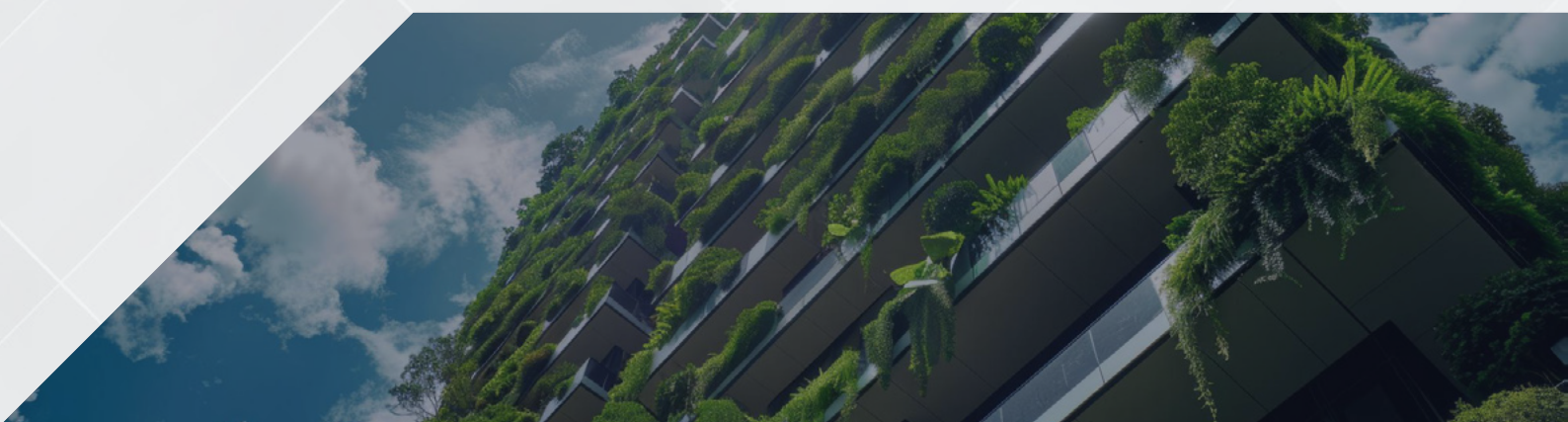
Social Responsibility

We strive to create a positive social value for the communities we serve. Acting with a deep sense of responsibility towards everyone around us, we actively support social development, economic activity, and community involvement, enhancing the societal fabric within urban landscapes. Advocating for a better real estate sector, we promote holistic planning that revives neighborhoods, empowers communities, and improves the quality of life around our assets.

At REALITY, we value human connections and collaborations with members of the communities in our areas of operation. As part of our value-add strategy, we work together with local authorities, resident communities, and social organizations to align our planning with the public's interest and create opportunities that contribute to society's welfare.

Our IMPACT Department promotes the development of sustainable cities and communities consistent with the UN SDG 11. Following our interim-use methodology, the IMPACT team transforms spaces into thriving hubs that support the local community. By fostering placemaking, sustainability initiatives, and art and culture events, we drive employment, attract visitors, and promote community ties.

We support social organizations and NGOs by providing them with flexible leasing options, reduced rental rates, and amplifying the reach of their activities.



Community Giving

Driven by our values, we go beyond our corporate responsibilities to make a positive difference in the world. REALITY contributes to nonprofit organizations and charitable causes and engages its employees with volunteer activities and donation matching opportunities to support society routinely and in critical times of need. In addition, REALITY EQUITY makes a donation with every asset acquisition and realization, and invites the party to the transaction to cross-donate with us.

We take a proactive role in our donations, embedding our professional standards and experience to support social causes close to our hearts. Consistent with our Philanthropy Policy, we ensure that all contributions are made in full compliance with the law and meticulously maintain accurate records.

In 2022, REALITY's Founders established the "Advot" Philanthropy Fund to dedicate their personal wealth to the common good. "Advot" aims to improve patients' quality of life by providing access to integrative medicine across the public health system in Israel, as well as supporting the local community during challenging times.



