

## **Electra Real Estate Ltd. Code of Ethics**

### **Introduction**

Electra Real Estate Ltd. (“Electra Real Estate” or the “Company”) is a subsidiary of Elco Ltd. The Company is a publicly traded company whose securities are listed on the Tel Aviv Stock Exchange. The Company specializes in the management of investment funds and investment partnerships for limited partners and serves as a partner in entities acting as the general partner of such funds and partnerships.

As part of the Elco Group, Electra Real Estate regards integrity, responsibility, and sound corporate governance as cornerstones of its business and values-based success.

The Code of Ethics of Electra Real Estate is intended to serve as a values compass for all Company employees, managers, directors, and representatives acting on its behalf, and to guide conduct vis-à-vis all stakeholders – employees, customers, investors, suppliers, authorities, and the community. Adherence to business ethics is a fundamental condition for values-based excellence and business leadership and forms the basis for public trust and the Company’s resilience.

Compliance with the Code of Ethics means acting with integrity, transparency, and responsibility, in accordance with the law and in the spirit of the Company’s values. The management of Electra Real Estate views business ethics as a substantive managerial value and is committed to leading the organization in accordance with the highest standards of fairness and professionalism.

Inspired by the policy of the founder of the Elco Group, Mr. Gershon Zalkind (of blessed memory), Electra Real Estate regards its employees as the core of its success and acts to foster their professional and personal development, while creating a safe, responsible, and respectful working environment.

Each employee of Electra Real Estate bears personal responsibility for upholding the principles of this Code of Ethics, reporting any concern regarding a breach of law or Company policy, and acting in accordance with the values guiding the organization.

The Code of Ethics is intended to assist in making sound, responsible, and ethical decisions, and to serve as a values compass guiding our path as a leading, reliable, and values-driven company.

## Our Principles and Values

The Company's Board of Directors is responsible for defining guiding principles and ensuring that they are implemented in the Company's strategy and aligned with its vision and values. The guiding values of Electra Real Estate are:

**Integrity and Fairness** – We act with transparency, reliability, and respect in every business interface and strive to establish long-term relationships with customers and business partners.

**Professionalism and Excellence** – Electra Real Estate aspires to fully realize its potential and to perform beyond expectations, pursuing uncompromising progress, striving for excellence, exceeding expectations, and consistently maintaining a leading position.

**Leadership** – Leadership in accordance with the values of the Elco Group means setting a personal example and providing inspiration, acting professionally and without personal motives, delegating authority, and providing backing and support.

**Efficiency** – A cohesive and flexible company that is agile, innovative, and attentive to its customers and investors.

**Initiative** – Always one step ahead, for the benefit of our customers and investors.

**Safety** – Ensuring a safe working environment for all employees.

### Sound Corporate Governance and High Standards of Conduct

As a public company, Electra Real Estate attaches great importance to maintaining stringent standards and conducting itself in accordance with the principles of sound corporate governance, in compliance with the legislative and regulatory environment in which it operates. This commitment applies to all those acting on behalf of the Company, including the Board of Directors, management, and employees.

Electra Real Estate is committed to making every effort to create positive long-term economic value for its investors and other stakeholders, while simultaneously generating economic, social, and environmental value, alongside responsible risk management.

### Records and Information Management

We are committed to maintaining records and reports on a regular basis and as required by law regarding our business and financial condition, and to ensuring lawful, ethical, transparent, and honest conduct toward shareholders, investors, and other stakeholders.

### Compliance with the Law

As a public company, all employees and managers of Electra Real Estate are required to act in accordance with the law and comply with all procedures and legal requirements of any competent authority.

### Financial Integrity

Financial integrity is a cornerstone of Electra Real Estate's success and credibility. All financial reports shall be reliable, accurate, and faithfully reflect the Company's true financial condition.

## **Commitment to Stakeholders of Electra Real Estate**

### **Fair Business Conduct**

Electra Real Estate is committed to conducting its business activities with integrity, fairness, and full transparency toward all its stakeholders – employees, customers, suppliers, service providers, investors, and shareholders.

The Company views fair business conduct as a core value forming the basis for trust and long-term relationships with all parties with whom it operates.

Any individual or entity acting on behalf of Electra Real Estate is required to comply with this Code of Ethics and any other relevant Company policies and to ensure that their actions reflect the Company's values and high ethical standards.

We expect all Company employees to act with integrity, responsibility, and transparency in every decision and action, and to safeguard the Company's reputation and public trust.

### **Prevention of Corruption and Bribery**

This Code of Ethics strictly prohibits corruption and bribery, in accordance with accepted standards of proper business conduct. The giving or receiving of bribes, fraud, illegal commissions, or any similar payments intended to improperly influence business decisions involving government officials, enforcement authorities, suppliers, or customers is strictly forbidden.

As a company operating internationally, Electra Real Estate is required to comply with local and international anti-bribery and anti-corruption laws and, in the event of conflict, to adopt the strictest applicable standard.

### **Anti-Money Laundering**

Electra Real Estate is fully committed to compliance with all applicable anti-money laundering laws and regulations. Accordingly, the Company carefully selects its business partners and does not engage with parties that fail to meet its ethical standards.

Employees are required to report to the Compliance Officer, Mr. Ohad Levi, any suspected transaction, lack of transparency regarding ownership, unusual payment requests or methods, or irregular payment destinations.

## **Employees of Electra Real Estate**

Electra Real Estate views its employees as its most valuable asset and the primary driver of its success. The Company is committed to providing a proper, responsible, and pleasant working environment, fair employment conditions, and full compliance with applicable laws.

The Company maintains a policy of continuous dialogue with employees, encouraging direct communication, listening, and inclusion, and invests in their professional and personal development while safeguarding their health, well-being, and sense of belonging. Electra Real Estate is committed to fostering an organizational culture based on mutual respect, cooperation, excellence, and responsibility.

### **Working According to Procedures**

Employees are required to act in accordance with Company procedures, policies, and enforcement programs, ensuring that their work meets the highest ethical, legal, and professional standards.

Appropriate mechanisms shall be established to ensure the implementation of procedures across all areas of activity. Managers bear primary responsibility for implementing procedures, ensuring employee awareness, and conducting onboarding and periodic refresher training as determined by the Company.

### **Diversity and Equal Opportunity**

Electra Real Estate respects all its employees in Israel and abroad and upholds diversity and the right to dignity without distinction based on race, gender, age, language, nationality, religion, sexual orientation, political views, disability, or ideology.

### **Privacy Protection**

Personal and sensitive information relating to employees, partners, or customers shall be safeguarded in accordance with applicable laws and the Company's privacy policies. Such information includes employee and salary details, investor and customer databases, and supplier and service provider information. Data shall be collected solely for legitimate purposes, with access granted in accordance with security policies.

### **Protection of Company Assets and Business Confidentiality**

Employees are required to protect the Company's tangible and intangible assets and business and trade secrets against loss, misuse, waste, damage, or theft.

### **Prohibition on Use of Inside Information**

Electra Real Estate is strictly committed to safeguarding inside information and any material non-public information. Inside information includes any material information relating to the Company, its investments, projects, or business partners, the disclosure of which could affect the value of the Company's securities or those of related entities.

Employees, officers, and directors are strictly prohibited from using inside information for investment, trading, or any other securities-related activity, or from disclosing such information to third parties, directly or indirectly. Violations may constitute a criminal offense and will result in severe disciplinary measures.

### **Political Activity**

Employees represent the Company in their interactions with external parties. Accordingly, any employee or manager expressing views publicly on matters related to the Company's activities must clearly state that such views are personal and do not represent the Company's position.

Employees and managers must strictly separate their professional role from any political or public activity and refrain from engaging in political activity using Company resources. The Company respects freedom of expression, provided it does not harm the Company's interests or reputation.

### **Prevention of Inappropriate Conduct and Harassment**

Electra Real Estate is committed to maintaining a respectful, safe, and positive work environment, free from violence, harassment, or degrading conduct of any kind, including sexual harassment. Any such conduct will be addressed with utmost seriousness.

### **Human and Employee Rights**

Electra Real Estate regards respect for human rights and employee rights as a fundamental condition for its growth and development. The Company is committed to fair employment practices, lawful working conditions, and preventing discrimination or exploitation of any kind, including with respect to contractors and temporary workers.

### **Suppliers and Customers of Electra Real Estate**

The suppliers, customers, and investors of Electra Real Estate constitute a central pillar in the Company's ability to grow, develop, and maintain long-term business excellence.

In accordance with the Company's policies, Electra Real Estate carefully selects suppliers and service providers who act with integrity and responsibility and who comply with all applicable legal requirements.

The Company is committed to providing its customers with professional, reliable, and high-quality services, to creating sustained added value for them, and to establishing long-term relationships based on trust, transparency, and fairness.

### **Investors of Electra Real Estate**

Investors are at the core of the Company's activities and form the foundation of the trust upon which its professional conduct is based. Electra Real Estate is committed to acting loyally, responsibly, fairly, and with full transparency toward its investors, while safeguarding their interests as a paramount value.

All business and managerial decisions shall be made based on professional judgment, responsible risk management, and prioritization of investors' interests, in accordance with applicable law, contractual arrangements, and the provisions of this Code of Ethics.

The Company attaches the utmost importance to maintaining the confidentiality of information and protecting the privacy of its investors, and shall take all reasonable and required measures to safeguard personal, financial, and business information from unauthorized use, disclosure, or harm, in full compliance with applicable laws and regulations.

### **Fair Business Conduct, Integrity, and Reliability**

Electra Real Estate is committed to conducting itself toward its suppliers, investors, and customers with integrity, respect for their rights, and fairness in negotiations and in the ordinary course of business.

### **Information Security and Privacy**

At Electra Real Estate, information security and the protection of privacy and confidentiality constitute a vital pillar of the Company's success and of maintaining the trust of its stakeholders and investors. The Company invests significant resources in safeguarding its information systems, data, and organizational knowledge, and operates in accordance with stringent information security policies and applicable legal requirements.

We are committed to refraining from any use of information to which we are exposed in the course of our work, business engagements, or ongoing activities, for any purpose that is not directly related to our role or to the Company's legitimate business activities.

The Company strictly safeguards the confidentiality of information and data relating to customers, suppliers, business partners, and investors, and ensures that access to such information is granted solely to authorized individuals and strictly on a need-to-know basis.

Electra Real Estate regards information security and privacy protection as paramount values and will continue to act toward the continuous improvement of its protective systems and organizational awareness in this field.

## Competition and Antitrust

Electra Real Estate is required to comply with all competition and antitrust laws and to engage with customers and suppliers, and to conduct itself toward competitors and third parties, in a fair and lawful manner. Accordingly, this Code of Ethics prohibits any unfair or unlawful conduct.

The Company is committed to operating under conditions of fair competition while ensuring the presentation of accurate, reliable, and clear information to its customers.

## Clarifications

**The rules of conduct set forth in this Code of Ethics do not replace or derogate from any laws or regulations to which the Company is subject. The Code constitutes an additional layer reflecting the Company's values-based approach and guiding the conduct of the Company and its personnel; however, it does not constitute a legally binding document and shall not serve as a basis for any claim, demand, or legal action against the Company, its directors, officers, employees, or representatives.**

**For convenience only, the masculine singular form is used throughout this document; however, the singular shall include the plural and vice versa, and references to the masculine shall be deemed to include all genders equally.**

## Implementation of the Code of Ethics

This Code of Ethics has been adopted by the Company's Board of Directors and management and constitutes an integral part of the Company's managerial culture and organizational conduct.

Every employee, manager, and director of the Company is required to act in accordance with the principles of this Code and, within the scope of their authority and role, to contribute to its implementation, application, and enforcement at all levels of the organization.

The Company's management, in cooperation with the Human Resources Department, shall conduct an orderly training and implementation program for all employees and managers regarding the Code of Ethics, in order to ensure familiarity, understanding, and practical application of its principles.

## The Code of Ethics as a Tool for Decision-Making in Ethical Dilemmas

Ethical dilemmas constitute the real-life test of the Code of Ethics. Such dilemmas may arise when at least two possible courses of action exist, yet none presents a perfect solution. At times, each option involves a tension between competing values, between a particular value and a business objective, or between established norms and practices.

In most cases, there is no single clear solution; therefore, sound judgment, responsibility, and sensitivity to the guiding values of Electra Real Estate are required.

When determining whether a particular action is ethical, it is recommended to consider the following questions:

1. What am I being asked to do?
2. Do I have all relevant facts?
3. Is the action lawful?
4. Is the action consistent with the Company's policies and procedures?

5. Would the action withstand the test of a reasonable employee or manager?
6. Would I feel discomfort or embarrassment if others knew I acted this way?
7. How would I feel if others acted this way toward me?

These questions are intended to assist in choosing the course of action most consistent with the Company's values and the spirit of this Code of Ethics.

## **About the Code of Ethics**

This Code of Ethics sets forth the fundamental principles, norms, and rules of conduct that guide our behavior toward the various parties with whom we interact, including employees, customers, suppliers, competitors, governmental authorities, institutions, the community, and the environment.

Its objectives are to guide us to act in compliance with the law, with respect for human dignity, integrity, and fairness; to foster an organizational culture aligned with the Company's needs and based on honesty and social responsibility; and to safeguard the Company's assets and ensure their proper use.

The standards of conduct set forth in this Code are binding upon all employees, managers, and directors of the Company. It is emphasized that this Code does not encompass all applicable values and obligations and does not replace or derogate from any laws or regulations; rather, it constitutes an additional values-based framework guiding the conduct of the Company and its personnel.

## **Implementation, Enforcement, and Reporting**

If you encounter conduct or actions that may constitute a violation of the principles set forth in this Code of Ethics, you are obligated to report such concerns. Reports may be submitted to the Vice President of Accounting and Control (Tel: +972-3-7101700), the Company Secretary (Tel: +972-3-6089816), or by email at [corpsecretary@ere.co.il](mailto:corpsecretary@ere.co.il).

Electra Real Estate undertakes to protect any individual who fulfills their obligation and reports a suspected violation of the Code. All reports shall be handled with the utmost seriousness, transparency, and discretion.

The Company shall treat any breach of this Code of Ethics with due severity and shall take appropriate disciplinary measures where necessary.