

ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

Matter Real Estate LLP (“Matter”) is committed to applying the highest standards of ethical conduct and integrity in its business activities.

Every employee and individual acting on Matter’s behalf is responsible for maintaining Matter’s reputation and for conducting business in an honest and ethical manner. Matter considers that bribery and corruption has a detrimental impact in business by undermining good governance. Matter has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

The Management Committee and senior management are committed to implementing and enforcing effective systems to prevent and eliminate bribery, in accordance with the UK Bribery Act 2010.

Matter has issued an anti-bribery and corruption policy, together with policies on gifts and corporate hospitality within its Employee Handbook (“Policies”), the Policies outline Matter’s position on preventing and prohibiting bribery and corruption.

These Policies apply to all persons working for Matter or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners and they are required to familiarise themselves and comply with these Policies. Specifically, it also applies to all funds and their general partners where Matter is appointed as Investment Advisor, including but not limited to:

- Matter UK Residential Income Fund SCSp
- Matter Gold ManCo S.à r.l.
- Placefirst SCSp
- Placefirst GP S.à r.l.
- Ruby Senior Living GP S.à r.l.

Employees and other individuals acting for Matter should note that bribery is a criminal offence that may result in up to 10 years’ imprisonment and/or an unlimited fine for the individual and an unlimited fine for Matter.

The success of Matter’s anti-bribery and corruption measures depends on those acting for Matter, playing their part in helping prevent bribery. Therefore, all employees, members and others acting for, or on behalf of, Matter are encouraged to report any suspected bribery in accordance with the procedures set out in the Policies.

Signed

A handwritten signature in black ink, appearing to read 'D Christie', with a long horizontal flourish extending to the right.

David Christie, Chief Executive Officer

Matter Real Estate LLP

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