

INVESTMENT ADVISOR BROCHURE

HARRISON STREET ADVISORS, LLC

444 West Lake Street
Suite 2100
Chicago, IL 60606

www.harrisonst.com

March 23, 2018

This brochure provides information about the qualifications and business practices of Harrison Street Advisors, LLC. If you have any questions about the contents of this brochure, please contact us through Tonia Nelson, Chief Compliance Officer at 312-920-0500; or tnelson@harrisonst.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Harrison Street Advisors, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Harrison Street Advisors, LLC is an SEC registered investment adviser. This registration does not imply a specific level of expertise, skill or training. This registration does not imply a recommendation by the United States Securities and Exchange Commission or by any state securities authority.

This Cover Page constitutes Item 1 to the Harrison Street Advisors, LLC Brochure, Form ADV, Part 2A.

Item 2 - Material Changes

The brochure is being revised to update the information presented in the previously filed and used brochure.

The Brochure discusses our intention to provide investment advisory services to an open-end social infrastructure property fund and asset management services to a closed-end opportunistic real estate fund.

Item 3 - TABLE OF CONTENTS

	Page
Item 1 - Cover Page	1
Item 2 - Material Changes	2
Item 3 - TABLE OF CONTENTS.....	3
Item 4 - Advisory Business	4
Item 5 - Fees and Compensation	7
Item 6 - Performance-Based Fees and Side-By-Side Management	8
Item 7 - Types of Clients	9
Item 8 - Methods of Analysis and Investment Strategies and Risk of Loss	10
Item 9 - Disciplinary Information.....	22
Item 10 - Other Financial Industry Activities and Affiliations	22
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	23
Item 12 - Brokerage Practices	25
Item 13 - Review of Accounts.....	25
Item 14 - Client Referrals and Other Compensation	26
Item 15 - Custody	27
Item 16 - Investment Discretion	27
Item 17 - Voting Client Securities.....	27
Item 18 - Financial Information.....	28

Item 4 - Advisory Business

Background and Ownership

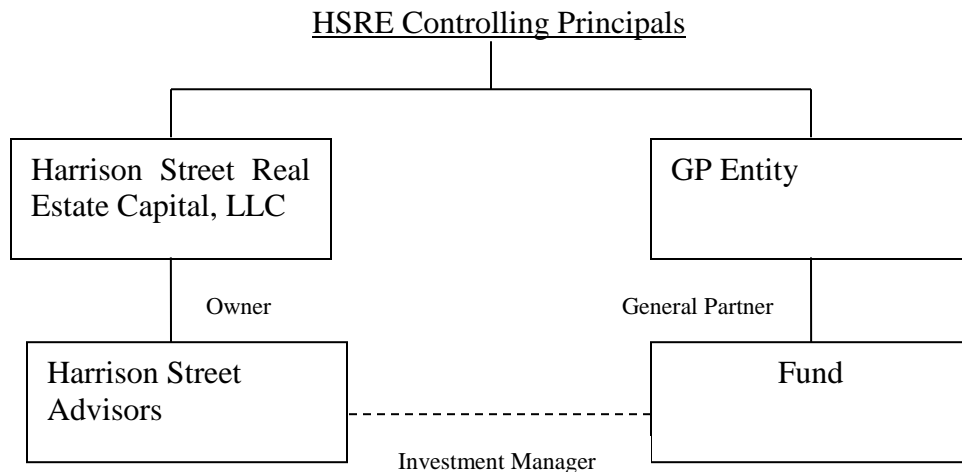
Harrison Street Advisors, LLC, a Delaware limited liability company (“Harrison Street Advisors,” “HSTA,” “we,” “us,” “our”), formed in May, 2011, provides investment management services to Harrison Street Core Property Fund, L.P. (the “Core Fund”) and any investment vehicles parallel or alternative to the Core Fund (“Parallel Vehicles”) ¹, along with certain separate accounts established by institutional investors. The Core Fund is an open-end, commingled investment fund which targets primarily what we believe to be stabilized investments in education, seniors housing, healthcare, storage properties, life science buildings, and other real property-related investments. An affiliate of Harrison Street Advisors serves as the general partner (the “General Partner”) of the Core Fund. The Core Fund was formed in the fall of 2011. The HSTA-advised separate accounts may, among other assets, target investments in education, seniors housing, healthcare, storage properties, and life science buildings. HSTA provides asset management services to two closed-end opportunistic European funds, Harrison Street European Partners, L.P. and Harrison Street European Partners II, L.P. (collectively with parallel funds known as “European Funds”) which primarily target student housing and residential real estate in the United Kingdom and Europe. We anticipate that we will also provide investment advisory services to an open-end social infrastructure property fund and asset management services to a closed-end opportunistic real estate fund. The social infrastructure fund expects to target infrastructure investments in the areas of higher education, health care systems and utility investments. The opportunistic fund would target investments in education, healthcare and storage properties. Thus, the descriptions in this Brochure of operations, services, fees, investment strategies, risks and other matters referencing the Core Fund and Investors in the Core Fund may apply substantively to these other HSTA clients. References in this Brochure to a “Fund” or “Fund-clients” is to the Core Fund and, once launched, the social infrastructure property fund, being investment advisory clients of the firm.

The sole owner of Harrison Street Advisors is Harrison Street Real Estate Capital, LLC, a Delaware limited liability company (“HSRE”). The controlling owners of HSRE are Christopher Merrill and Christopher Galvin. Messrs. Galvin and Merrill along with Michael Galvin (together the “HSRE Controlling Principals”) are the members of the Board of Managers of HSRE. HSRE was formed in 2005 and in addition to the investment vehicles discussed above is the sponsor of a series of private closed-end U.S. real estate investment funds and a joint venture which invests solely in commercial real estate classes that are not in the education, seniors housing, healthcare, storage and life science buildings sectors. Affiliates of Harrison Street Advisors serve as the general partners of each of these investment vehicles.

HSRE has, as of December 31, 2017, in the aggregate, more than \$13.5 Billion of gross assets under management (utilizing a conversion rate of US\$1.2006 to €1.00 to convert European Fund amounts to U.S. Dollars). HSRE Securities Advisors, LLC, a wholly-owned subsidiary of HSRE, is a registered investment advisor which as of December 31, 2017 has approximately \$5

¹ Except as specifically indicated, all references in this Brochure to Core Fund include the Core Fund and all related Parallel Vehicles, one of which is Luxembourg-based and has additional directors and a local investment manager.

Million of gross regulatory assets under management. HSRE Securities Advisors, LLC, succeeded to the business of Harrison Street Securities, LLC.



HSTA provides asset management services to other real estate equity investment vehicles sponsored directly or indirectly by HSRE, including the European Funds.

Investments

Core Fund

Harrison Street Advisors targets investment opportunities in the education, healthcare and storage sectors of the commercial real property market focusing primarily on: (i) student housing, both on and off campus, and other education-related real estate investments; (ii) medical office buildings, and other healthcare related real estate investments; (iii) seniors housing, including, but not limited to independent living facilities, assisted living facilities and memory care facilities; (iv) self-storage, boat storage, and marinas and (v) life science buildings (collectively the “Primary Property Types”). For the Core Fund, the primary investment focus is on what we believe are stabilized, income-producing investments that provide a combination of current income and long-term growth and appreciation. Investments may be made by the Core Fund directly and indirectly, including, without limitation, through joint ventures with operating partners and other third parties. The Core Fund is authorized to purchase equity interests and debt instruments secured by mortgages on Primary Property Types of real estate but only if such purchase is with the intent to acquire the underlying properties. The geographic focus is throughout the United States.

The General Partner has created and may create, in its discretion, Parallel Vehicles (including an offshore investment vehicle and joint ventures with other investors) that will, for the most part, invest proportionately in investments of the Core Fund on substantially the same terms and conditions as the Core Fund. Harrison Street Advisors will provide investment management services to the Parallel Vehicles, if any. See footnote 1 above.

HSTA commenced its investment advisory activities in November, 2011 following receipt by the Core Fund of \$100,000,000 of capital commitments (“Commitments”) from the Core Fund’s initial limited partners. The Core Fund limited partners are referred to in this Brochure as

“Investors”. At December 31, 2017, the Core Fund had \$3,692,880,970 of Commitments, of which \$2,975,230,970 had been funded by Investors. The minimum Commitment for each Investor in the Core Fund is \$10 million, unless the General Partner accepts a lesser amount in its discretion.

Harrison Street Advisors has, as of December 31, 2017, a total of \$6,866,186,580 of Gross Asset Value (“GAV” based on consolidated GAAP Investments in Real Estate, excluding investments in unconsolidated joint ventures) of Core Fund properties under management, and the Core Fund had \$717,650,000 of uncalled Commitments.

Separate Accounts

HSTA provides investment advisory services to certain separate accounts with institutional investors. The separate accounts target investments in areas such as education, healthcare and storage sectors as outlined by the specific account documents. In certain cases, the separate accounts might invest alongside another investment vehicle sponsored by HSRE.

Description of Advisory Services

As investment manager Harrison Street Advisors will:

1. Identify and recommend investment opportunities;
2. Participate in monitoring and evaluating the client’s investments;
3. Make recommendations regarding the financing, refinancing and/or sale of investments;
4. Make recommendations regarding the short term investment of cash pending distribution or reinvestment in real properties; and
5. Providing asset management services with respect to investments.

Investment advice is provided directly to the Core Fund and the Parallel Vehicles and not individually to Fund Investors or any Parallel Vehicle’s Investors. HSTA has full discretionary authority with respect to investment decisions, and its advice with respect to the Core Fund and is tailored according to the investment objectives, guidelines, restrictions, and requirements as set forth in the Private Placement Memorandum and Limited Partnership Agreement of the Fund and limited partnership agreements of its Parallel Vehicles.

Please refer to the Core Fund’s diversification restrictions discussed in Item 8 below.

Its advice to separate account clients is tailored according to the investment objectives, guidelines, restrictions, and requirements presented in the investment management agreement and related documents provided to HSTA by the client.

Item 5 - Fees and Compensation

Under our Investment Management Agreements with the Core Fund and Parallel Vehicles, we are entitled to compensation for our services in the form of an investment management fee (the “Management Fee”), payable quarterly in arrears. The Management Fee is determined on an Investor-by-Investor basis and is billed, and in the discretion of the Investor, either payable by the Investors directly or by withdrawal from their respective Core Fund (or Parallel Vehicle) capital accounts, in addition to funding their Commitments. The Private Placement Memorandum of the Core Fund, as supplemented from time to time (the “PPM”), and the Core Fund Limited Partnership Agreement includes further details on fees and compensation and related matters. We expect that the social infrastructure fund base Management Fee arrangements will be substantially similar to the Core Fund fee discussed below.

The Management Fee is calculated with respect to each Core Fund Investor’s share of the Core Fund’s net asset value (“NAV”) at the end of the applicable calendar quarter. An Investor’s Management Fee rate is negotiable at the discretion of Harrison Street Advisors.

The Management Fee with respect to an Investor’s NAV is equal to the Investor’s portion of the Core Fund NAV multiplied by the applicable Management Fee rate as set forth in the table below:

<u>Investor’s NAV</u>	<u>Annual Management Fee Rate Applied to Investor’s NAV</u>
First \$25 million	1.15%
In excess of \$25 million to \$50 million	1.05%
In excess of \$50 million to \$75 million	0.95%
In excess of \$75 million to \$100 million	0.90%
In excess of \$100 million	0.85%

For example, if an Investor’s NAV as of the close of a calendar quarter in a year was equal to \$60 million, the Management Fee for such investor for such calendar quarter would be equal to \$161,250.00, computed as follows: (i) \$71,875.00 (i.e., \$25 million x 1.15% x 25%) for the first \$25 million of such Investor’s NAV; plus (ii) \$65,625.00 (i.e., \$25 million x 1.05% x 25%) for the next \$25 million of such Investor’s NAV; plus (iii) \$23,750.00 (i.e., \$10 million x 0.95% x 25%) for the remaining \$10 million of such Investor’s NAV.

HSTA may in certain situations, receive negotiated fees for providing asset management services to a co-investment joint venture of which the Core Fund is a member but does not pay separate fees.

Management fees for HSTA-advised separate accounts will be negotiated between HSTA and the institutional client.

Additional Fees and Expenses

Harrison Street Advisors will bear its own costs of compensation of HSRE personnel that provide services to it and related overhead expenses, except as described below.

Fund Investors will bear indirectly as partnership expenses any costs and expenses allocated by Harrison Street Advisors or the General Partner to the applicable Fund, which costs and expenses will be deducted directly from the applicable Fund. Those costs and expenses will vary, but typically include charges for professional services such as legal, accounting and appraisal activities. Limited Partners in non-US based Parallel Vehicles may bear additional costs and expenses of local agents and custodians.

The Fund will incur expenses for maintenance of books and records, custody fees, audit expense, tax preparation expense, organizational expense, insurance expense, appraisal costs, and annual licensing and registration fees, and taxes. The Fund will pay costs and expenses incurred in connection with board, advisory committee and Investor meetings. As each Fund anticipates borrowing, there will be interest expense and fees for credit at the investment level and at the partnership level. In addition, the Fund will incur legal expenses, third party advisors and consultants' expenses, and brokerage commissions (as discussed in item 12 below) in connection with the acquisition or disposition of investments and the handling of distressed investments, if any. Each Fund also incurs the cost of conducting due diligence on all prospective investments including, without limitation, travel related costs and costs of investments not pursued to acquisition, as well as closing costs, for acquired investments. Property operating costs and capital expenditures are expected to be paid from Property revenues.

This list is not intended to be exhaustive and Investors in a Fund-client are encouraged to review the Limited Partnership Agreement for a more extensive description of the fees and expenses associated with an investment including, among other items, any applicable redemption charge that may be assessed. Neither Harrison Street Advisors nor any of its supervised persons (as defined in the Investment Advisers Act) accepts compensation for the sale of securities or other investment products.

HSTA separate account clients will bear any costs and expenses allocated by HSTA to their respective separate accounts in accordance with the governing documents of the account. Those costs and expenses will vary, but typically will involve charges for professional service fees such as legal, accounting and appraisal activities. Separate account clients will also incur expenses for custody fees, audit, tax preparation, insurance, and property related expenses.

Item 6 - Performance-Based Fees and Side-By-Side Management

Our Management Fee is based solely on the NAV of the Core Fund and all of its Parallel Vehicles. Although our Management Fee will be affected by the performance of the assets under management, our Management Fee is not a performance fee, which is typically based on a fund achieving certain performance metrics.

Incentive Fee

We may, in the future, charge a performance based fee that would be payable solely by new Investors in the Core Fund. As members in the general partner of the Social Infrastructure Fund, principals and employees of HSRE may receive Carried Interest payments directed to the General partner under the Social Infrastructure Fund's Limited Partnership Agreement. Carried Interest payments are directly tied to the performance of the social infrastructure fund. Any such performance fee would be subject to Section 205(a)(1) of the Investment Advisors Act and structured in accordance with available exemptions thereunder including the exemption provided in SEC Rule 205-3.

Other private investment funds sponsored by HSRE and any separate accounts that may be managed by Harrison Street Advisors that invest in similar asset classes as the Core Fund may have different investment advisory fees, including promote structures and acquisition fees as outlined in the specific investor agreements which also can create the conflict that more attractive investment opportunities may be directed to affiliated private investment funds with greater investment advisory fees.

Each of the private investment funds and separate accounts sponsored by HSRE has different investment guidelines and objectives than the Core Fund and while they generally do not compete for the same investments, we have established policies and procedures to help mitigate any conflicts should they arise. If a particular investment would be appropriate for the Core Fund and one or more HSRE-sponsored private real estate investment funds or any separate account, the investment will be allocated by the HSRE Allocations Committee in accordance with the allocation policy which includes guidelines for allocation and rotation based on a list maintained by the Chief Compliance Officer. Harrison Street Advisors has adopted and implemented written compliance policies and procedures that are designed to address the above conflicts of interest. Further, as a fiduciary, Harrison Street Advisors recognizes its duties to act in good faith and with fairness in all of its dealings with the Core Fund and other clients.

Item 7 - Types of Clients

Harrison Street Advisors provides portfolio management services to the Core Fund and its Parallel Vehicles along with institutional separate account clients. The Core Fund Investors include large public and corporate pension plans, insurance companies and trusts, endowments, foundations, and financial institutions, and may also include high net worth individuals. Investors are limited partners in the Core Fund. The Core Fund is generally subject to a minimum Commitment amount of \$10,000,000 and restricted to investors who qualify as a Qualified Purchaser. In some instances, the minimum commitment to the Core Fund may be waived in the General Partner's discretion.

In addition to providing investment management services to the Core Fund and separate accounts, we provide asset management services to other real estate equity investment vehicles sponsored directly or indirectly by HSRE.

We anticipate that we will also provide investment advisory services to an open-end social infrastructure property fund and asset management services to a closed-end opportunistic real estate fund.

Important Notice

This Brochure may be provided to prospective investors (“Investors”) in a HSRE-sponsored Fund or Parallel Vehicle, together with the specific investment vehicle’s private placement memorandum (“PPM”), organizational documents and other related documents (“Governing Documents”), in connection with Investor’s consideration of an investment. While this Brochure may include information about the vehicles sponsored by HSRE, it does not represent a complete discussion of the features, risks or conflicts associated with the investment vehicles. More complete information is included in the PPM and other Governing Documents.

In no event should this Brochure be considered an offer of units in an investment vehicle sponsored by HSRE or be relied upon in determining whether to invest in the vehicle sponsored by HSRE. It is also not an offer of, or agreement to provide, advisory services directly to any Investor. Rather, this Brochure is designed only to provide information about us to comply with regulatory requirements under the Investment Advisers Act of 1940. Information in this Brochure may differ from the information provided in the PPM. If there is any conflict between the information in this Brochure and similar information in the PPM, Investors should rely on the information in the PPM with respect to their investment in various investment vehicles sponsored by HSRE.

Item 8 - Methods of Analysis and Investment Strategies and Risk of Loss

Methods of Analysis and Investment Strategies

We target investment opportunities in the primary Property Types. With respect to the Core Fund, we are authorized to make an investment in equity interests and debt instruments secured by mortgages on Primary Property Types of real estate but only if the intent is to acquire the underlying properties. The primary investment focus will be on what we believe to be stabilized, income-producing investments that provide a combination of strong current income and long-term growth and appreciation. On a limited basis, the Core Fund may invest in certain development properties that, upon completion, are expected to be stabilized income-producing investments that may provide a combination of strong current income and long-term growth and appreciation. The Core Fund may participate in transactions with other HSRE-sponsored funds or separate accounts to acquire Primary Property Types held in large portfolios.

The majority of the return from the Core Fund is expected to be realized from current operating income, with a lesser portion of the return to be derived from asset value appreciation.

Investments may be made by the Core Fund or HSTA-advised separate account directly and indirectly, including, without limitation, through joint ventures with operating partners and other third parties.

The geographic focus of investments is throughout the United States or as defined in the governing documents for the specific separate account or fund documents.

Because the Core Fund is an open-end fund, it will, from time to time, have significant cash reserves. If the situation arises, we will advise the Core Fund on the investment of its cash reserves in shares of money market funds.

We intend to primarily source potential Primary Property Type investments via our industry relationships and our network of lenders, “mom & pop” owners, market contacts, existing operating partners and potential new operating partners. While the focus is on building portfolios via single property or small to medium-sized portfolio investments ranging in size from \$30 to \$50 million in equity commitments, the investment vehicles have, and may, in the future, acquire larger properties or portfolios. The investment vehicles will generally seek out local or regional operators to manage and lease the investment vehicle’s properties. In certain cases we will require or permit an operator to co-invest alongside for stronger alignment.

Among other considerations, traditional market-specific real estate analysis and comparisons to existing investments in targeted sectors is used to assess the risks and opportunities associated with assets targeted for investment. A more macro approach is applied in evaluating the strengths and weaknesses of potential real estate strategies and prospective operators. Real estate investment risk associated with the various investments are assessed through thorough market research, comparison to the performance of other assets held by the investment vehicle as well as affiliated private real estate funds, and financial modeling. This includes an assessment of a property’s underlying value. This assessment includes a critical review of an asset’s construction quality, the functionality of its design, the quality of its tenants, and its capital expenditure history and projected capital needs. It involves, as well, gauging the demand for such properties in the submarket, the asset’s competitive advantages or disadvantages in its submarket, and the submarket’s position within the broader market. Current or planned construction activity is identified, both of competitive properties and of properties that may stimulate demand for the subject property. Additionally, a proprietary set of variables that we believe should be present in order for assets in the Primary Property Types to perform well are applied. For instance, when considering a student housing investment, we evaluate enrollment, location, penetration ratio, demographics, financial aid characteristics, commuter student presence, etc.

Assessing Operators and Joint Venture Partners

We seek to form relationships with operators who possess considerable management and operating capabilities, along with a well-formulated and well-defined business strategy. We evaluate many factors of each prospective operator including its management organization and performance in historical relationships with partners. In addition, we seek operators who are highly regarded, have demonstrated expertise in a specific property type, and have experience in the specific investment strategy being pursued.

In assessing prospective operators, particularly operators who become partners, we use a model that we developed through years of joint venture investing. Specific items to be reviewed include the operator’s: (i) capital structure and financial resources, (ii) strategic plan, and (iii) management organization (i.e., leasing and operating team).

To the extent that the investment vehicle does not own 100% of the property, we endeavor to structure the joint ventures so that the investment vehicle maintains control over major decisions (e.g. sale, refinance major leases and changes in property management). We intend to structure each joint venture to enable the investment vehicle to sell 100% of the real estate or its interest in the joint venture at the appropriate time. We intend to clearly define the economic objectives of the investment vehicle, its Investors and the operator in the manner in which decisions relating to the operation and exit of investments are made throughout the life of the investment. Careful attention is given to the value of any preferences or incentives that are part of the economic structure of rewards. Consideration of any enhancement to the investment vehicle's return achieved through the use of leverage or investment structure is secondary, although these elements are critically evaluated for their impact on the investment vehicle's overall targeted return.

Financing/Leverage

The amount of leverage that may be placed on investments is outlined in the specific investment vehicle's governing documents. In general, leverage occurs via property level debt and lines of credit/subscription facilities.

With respect to the Core Fund, all of the Core Fund investments will not exceed 40% of the gross value of its investments at the time of the borrowing unless the Core Fund's Advisory Committee approves a higher percentage. In addition, the Core Fund has a credit facility that may be used to make investments and pay expenses and property costs in lieu of or in advance of the funding of Investors' Commitments. Please note that the use of a credit facility is not included in the leverage test for the Core Fund with the exception of any principal balance that remains outstanding for more than 90 days. The Core Fund expects to utilize fund-level institutionally placed term financing rather than property level debt when possible.

Diversification

The governing documents for each investment vehicle will outline a variety of investment restrictions to allow for diversification.

As the Core Fund's NAV exceeds \$1 billion, the following restrictions shall apply (determined in each case as of the date of each investment unless waived by the holders of a majority of the limited partnership units of the Core Fund):

- Not more than 40% of the Core Fund's NAV shall be in any Primary Property Type;
- Not more than 20% of the Core Fund's NAV shall be in investments located in any single metropolitan statistical area ("MSA and no more than 30% of the Fund's NAV will be in one designated MSA; and
- Not more than 15% of the Core Fund's NAV shall be made in any single investment.

Material Risks of Loss

While Harrison Street Advisors seeks to understand the risks involved in investment decisions, no strategy is immune to risk. Investors in the Core Fund, separate account clients or investors in other investment vehicles sponsored by HSRE must understand that their capital is at risk of loss even though it primarily invests in individual real estate assets and core strategies that typically employ lower leverage, have more durable cash flows, and are in lower volatility markets.

In general, there can be no assurance that any strategy will achieve its investment objectives or that the Investors or separate account clients will receive any return on, or the return of, their invested capital. Investors and prospective investors and separate account clients should review all risks associated with a potential investment and be prepared to bear any loss. Investors and prospective investors in a Fund-client should review the detailed discussion of risks set forth in the PPM.

Risks Inherent in Real Estate Investments

General Risks. The investment vehicles are subject to risks common to the ownership of real estate, including: changes in general economic or local conditions, changes in tenant preferences that reduce the attractiveness of the properties to tenants; fluctuation in occupancy rates, operating expenses and rental schedules; costs associated with the need to periodically repair, renovate and re-lease space; withdrawal of tenants and difficulty of replacing tenants; tenant defaults; tenant bankruptcies; changes in supply or demand of competing properties in an area, such as an excess supply resulting from over-building; changes in interest rates, zoning and other governmental regulations and availability of mortgage funds that may render the sale of a property difficult or unattractive; increases in maintenance, insurance and other operating costs, including real estate taxes, associated with one or more properties, which may occur as other circumstances such as market factors and competition cause a reduction in revenues from such properties; inflation; changes in tax laws and rates; and impositions by governmental authorities.

Uncertain Economic Condition. In recent years credit markets have tightened, property transaction volumes have slowed and real estate values have experienced significant downward pressures. These factors have made the valuation of real estate investments more difficult. Because there is significant uncertainty in the valuation of, and/or in the stability of the value of certain of the possible investments, the fair values of such investments as reflected in the results of operations may not reflect the prices that the investment vehicles would obtain if such investments were actually sold. There can be no assurance that we will be able to make real estate investments that will generate the targeted returns. The investment vehicles may also be required to hold illiquid investments for several years before any disposition can be effected.

Valuation Risks. We intend to cause each Core Fund property to be externally valued by an Appraisal Management Firm performing a restricted appraisal in the three quarters immediately following its acquisition. During the calendar quarter that marks the one year anniversary of the date of acquisition, the property will be valued by a third party appraiser performing a full appraisal report. In each subsequent year, the asset will be appraised in a similar fashion (i.e. for the quarter in which the anniversary of its original acquisition occurs, the Appraisal Management

Firm shall select, schedule and supervise third party appraisers performing a full appraisal and, for all other quarters, the Appraisal Management Firm shall perform a restricted appraisal. The valuation of the Core Fund properties will factor into the NAV of an Investor's account which, in turn, is used to determine our Management Fees, the value of limited partnership interests for investment and redemption purposes. There can be no assurance that the valuation given to any property is indicative of the amount that an unaffiliated third party would be willing to pay for such property. Valuation methodology and frequency will be outlined in the governing documents for each investment vehicle.

Due Diligence and Analytic Risks. There is generally limited publicly-available information about real properties, and we must therefore rely on our own due diligence and that of our affiliates. Should the pre-acquisition evaluation of the physical condition of a new investment fail to detect certain defects or necessary repairs, the total investment cost could be significantly higher than expected. Furthermore, should our estimates of the costs of improving, repositioning or redeveloping an acquired property prove too low, or its estimates of the time required to achieve occupancy prove too optimistic, the profitability of the investment may be adversely affected.

Fixed and Variable Cost Risks. Many costs associated with a real estate investment, such as debt service and real estate taxes, are not reduced even when a property is not fully occupied, or other circumstances cause a reduction in income from the investment. These fixed costs intensify the risk of a tenant default or an unanticipated delay in achieving occupancy of a newly constructed or redeveloped property or re-letting a property upon lease expiration. Some costs associated with a real estate investment, such as maintenance and repairs, may be subject to cost increases beyond the control of the investment vehicle. Variable rate debt in a time of rising interest rates could also result in unanticipated costs increases.

Interest rate hedging transactions entered into directly with counterparty is subject to the risk that the counterparty will fail to perform its obligations in accordance with the agreed terms and conditions of the transaction. A counterparty may become bankrupt or otherwise fail to perform its obligations due to financial difficulties resulting in significant delays in obtaining any recovery in a bankruptcy or other reorganization proceeding or no recovery in such circumstances.

Leverage Risks. The purchase price of each investment is expected to be partially financed. Limitations of leverage are outlined in the governing documents of the investment vehicle. The degree of leverage could have important consequences to investors, including limiting the ability of the investment vehicle to obtain additional financing in the future for working capital, capital expenditures, acquisitions, or other general purposes and making the investment vehicle more vulnerable to a downturn in business or the economy generally. The investment vehicles can enter into a credit facility in order to, among other things, acquire properties, and pay expenses and property costs in lieu of or in advance of the funding of Investors' Commitments. Please note that the use of a credit facility secured by Investor Commitments impact on leverage ratios for the investment vehicle will be outlined in the specific governing documents, in example for the Core Fund only balances outstanding longer than 90 days are included in the calculation.

Loan Default Risks. The mortgage loan documents for the properties will generally contain customary covenants, such as requirements relating to the maintenance of the property securing the debt, restrictions on pledging and creating other liens on the property, restrictions on incurring additional indebtedness and restrictions on transactions with affiliates. Failure to make timely payments of principal and interest on mortgage loans or to observe these loan covenants could result in the declaration of a default by the lender. The consequences of a declaration of default include foreclosure of the mortgage, resulting in loss of both the property and the income it produces, the incurrence of substantial legal costs, the imposition of a deficiency judgment if the foreclosure sale does not result in proceeds sufficient to satisfy the mortgage, and potential adverse tax consequences to the Investors. A default under one loan could result in default under other loans.

Refinancing Risks. Mortgage loans on the Core Fund's properties may be subject to relatively short maturities, which may require refinancing before the properties are disposed of. There is no assurance that replacement financing can be obtained or, if it is obtained, those interest rates and other terms would be as favorable as the original loan. Inability to refinance a loan on favorable terms may compel the investment vehicle to attempt to dispose of the property or other properties on terms less favorable than might be obtained at a later date. The ability to refinance a loan can affect levels of cash available for redemptions of Units and purchase of new investments.

Investment Policies and Strategies. We may not meet the stated investment strategy and goals of the Fund-client or separate account client, including cash distributions and overall return targets. The General Partner has the right to vary from its strategy and policies if it determines it is in the best interests of the Core Fund or as provided in other investment vehicle governing documents.

Equity and Debt Instrument Investments. We may cause the Core Fund to purchase equity interests or debt instruments secured by mortgages on Primary Property Type investments with a view towards acquiring the subject property. In the event that the Core Fund is not able to complete the desired property acquisition, it may need to liquidate its investment in the equity interests or debt instruments. There can be no assurance that it will be able to liquidate such investments in an orderly fashion or without incurring a loss.

Joint Venture Risks. Instead of making investments directly, the investment vehicles may make investments through joint ventures or other entities. Such investments may involve risks not present in wholly-owned investments, including for example, the possibility that a partner of the investment vehicle might commit fraud, become bankrupt or may have economic or business interests or goals which are inconsistent with those of the investment vehicle, or that such partner may be in a position to take action contrary to the instructions or the requests of the investment vehicle or contrary to the policies or objectives or otherwise have certain rights with respect to the investments, which may limit the ability to protect its position and make decisions with respect to its investments. In addition, in certain circumstances, the investment vehicle may rely upon the operating partner for operational expertise, which reliance may ultimately not be justified. Furthermore, if an operating partner defaults on its funding obligations, it may be difficult for the investment vehicle to make up the shortfall from other sources. Any default by an operating partner could have an adverse effect on the investment vehicle, its assets, and the interests of the Investors. In addition, the investment vehicle may be liable for actions of its

partners. While we will attempt to limit the liability of the investment vehicle by reviewing qualifications and previous experience of operating partners, such action may not be sufficient to protect from liability or loss.

Competition with Operating Partners. Operating Partners may, subject to certain limitations, invest in properties that may compete with properties owned directly or indirectly by the investment vehicle. The operating partners also may provide management and other services to other properties located within or near the market areas where the properties are located, and may at times face conflicts of interests because of the competition for tenants between the investment vehicle's properties and the properties of such operating partners and/or their other clients. The operating partners and their affiliates may not favor the leasing of a property over the leasing of other properties, one or more of which may be in close proximity to a investment vehicle's property.

Tenant Default and Bankruptcy. A tenant's default in performing its lease obligations, or the tenant's bankruptcy, could adversely affect cash flow from a real estate investment and cause the investment vehicle to incur legal costs and other costs that would not likely be recouped. An early termination of a lease by a bankrupt tenant would result in unanticipated expenses to re-let the premises.

Non-Renewal of Leases. Real estate investments will be subject to the risk that, upon expiration, leases for space may not be renewed, the space may not be re-leased, or the terms of renewal or re-lease, including the cost of required renovations or concessions, may be less favorable than current lease terms. In the event of any of these circumstances, cash flow from real estate investments and, therefore, the value of an investment could be adversely affected. These risks may be particularly acute for single-tenant properties.

Investments in Debt Instruments. Based upon the applicable state law (which laws may differ substantially from state to state), investments in debt may be adversely affected by (i) the operation of state law with respect to the ability to foreclose mortgage loans or to exercise other creditors' rights provided in the underlying loan documents, (ii) lender liability with respect to the negotiation, administration, collection and/or foreclosure of mortgage loans, (iii) penalties for violations of state usury limitations and (iv) the impact of bankruptcy law.

REIT Risks. The Core Fund, along with other investment vehicles, holds or may hold its Primary Property Type investments through a subsidiary ("Subsidiary REIT") that is a real estate investment trust ("REIT"). The investment vehicles may be limited in making and structuring its investments in order to maintain REIT status for its Subsidiary REIT.

Investor Failure to Fund Commitments. If an Investor fails to fund its Commitment obligations when due, the ability to complete its investment program or otherwise to continue operations may be substantially impaired. A default by one or more Investors who have made Commitments could limit opportunities for investment diversification and reduce returns to the investment vehicle.

Illiquidity of Interests. Investors should be aware of the long-term nature of an investment in the Core Fund or other investment vehicles. There is not now and may not ever be a public market

for the units of limited partnership interests in the Core Fund (“Units”) or other investment vehicle. Because the Units have not been registered under the Securities Act of 1933 (“Securities Act”) or under the securities laws of any state or non-United States jurisdiction, the Units are “restricted securities” and cannot be resold in the United States except as permitted under the Securities Act and applicable state securities laws, pursuant to registration thereunder or exemption from such registration. It is not presently contemplated that registration under the Securities Act or other securities laws will ever be effected. The Units may also not be sold or otherwise transferred without the consent of the General Partner and compliance with the various investment vehicles governing documents such as the Core Fund Limited Partnership Agreement. Accordingly, an Investor may not be able to liquidate its investment in the event of an emergency or for any other reason, and its Units may not be acceptable as collateral for loans. Limitations on the transfer of the Units may also adversely affect the price that an Investor might be able to obtain for Units in a private sale.

No Assurance of Liquidity to Permit Redemptions. Although all Investors have the right to request redemption of their Units in the Core Fund after a lock-up period, the Core Fund (i) may not have sufficient available cash to fund the redemption of Units when redemptions are requested, or (ii) may exercise its discretion to not permit redemption of Units. There is no guarantee that cash will be available at any particular time to fund a particular redemption request, and the Core Fund is under no obligation to make such cash immediately available through the sale of assets, acceptance of new Investor Commitments, borrowings or otherwise. In addition, the Core Fund’s compliance with the United States federal income tax rules applicable to REITs may affect the Core Fund’s ability to satisfy a redemption request. Under the Core Fund’s redemption policy as set forth in its Limited Partnership Agreement, any redemptions will be made using available redemption proceeds (i) first, to satisfy any redemption requests from a prior quarter that were not satisfied in full on a pro rata basis in proportion to the total number of Units owned by the Investors who submitted redemption requests with respect to such earlier redemption date and (ii) secondly to fund redemption requests submitted by Investors for the current redemption date on a pro rata basis on the total number of Units owned by Investors seeking redemption. Redemption ability, if any, and procedures are outlined in the governing documents of the other investment vehicles.

Cyber Security Risk. With the increased use of technologies such as the Internet to conduct business, Harrison Street Advisors, the investment vehicles and properties are susceptible to operational, information security and related risks. In general, cyber incidents can result from deliberate attacks or unintentional events and can lead to the misappropriation or corruption of Fund, Investor and property related data. Cyber security failures or breaches by a third party service provider can cause disruptions and impact business operations and violations of applicable privacy and other laws. HSRE has taken and continues to take steps that it deems commercially reasonable to mitigate the risk of a cyber security failure or breach.

Risks Associated with Primary Property Types

In addition to the general risks of investing in real estate, each of the Primary Property Types has specific risks.

Generally. While we believe that each of the Primary Property Types has attractive demographics and characteristics, such demographics and characteristics may change materially, which could materially and adversely affect the investment vehicles operating results.

Student Housing. Student housing properties face significant competition from university-owned student housing and from other private student housing communities located within close proximity to universities. Many students prefer on-campus housing because of the closer physical proximity to campus and the integration of on-campus facilities into the academic community. Universities can generally avoid real estate taxes and borrow funds at lower interest rates. Consequently, universities can often offer more convenient and/or less expensive student housing than private operators of student housing, which can adversely impact occupancy and rental rates. Finally, student housing properties usually require greater maintenance costs because of increased damage or wear and tear than would apply to other types of housing, and usually have a higher turnover rate than would apply to other types of multifamily properties, compounded by the fact that in some instances student leases are available for periods of less than 12 months. All these factors combine to produce heightened uncertainty with respect to predicting cash flows generated by student housing.

Senior Housing. The success of assisted-living and other seniors housing depends in large part on success in attracting elderly senior citizens with the ability to pay for the services they receive. While a portion of the fees payable by residents of seniors housing facilities may be reimbursed by government and private payors, many such facilities are substantially dependent on the ability of the residents and their families to pay directly. In addition, some payors, such as Medicare, limit the number of days for which payment will be made in some settings, such as skilled nursing facilities, and most payors limit the types of services for which payment will be made and/or the amount paid for each particular service. Finally, the healthcare industry in the U.S. is highly regulated by Federal, State, provincial and local licensing requirements, facility inspections, reimbursement policies, regulations concerning capital and other expenditures, certification requirements and other laws, regulations and rules. The failure of an operator to comply with such laws, requirements and regulations could affect an operator's ability to operate the senior housing facilities that the investment vehicle owns.

Medical Office Buildings ("MOBs")

Competition for MOBs. The investment vehicles may compete with a significant number of other entities for acquisitions of MOBs and healthcare-related facilities. The competition for healthcare real estate properties may significantly increase the price for MOBs and healthcare-related facilities or other real estate related assets sought to be acquired. In addition, potential acquisition targets may find the competitors to be more attractive because they may have greater resources, may be willing to pay more for the properties, or may have a more compatible operating philosophy. In particular, large healthcare REITs may enjoy significant competitive advantages that result from, among other things, a lower cost of capital and enhanced operating efficiencies. This competition will result in increased demand for these assets and therefore increased prices paid for them. Because of an increased interest in single-property acquisitions among tax-motivated individual purchasers, the investment vehicle may pay higher prices if it purchases single properties in comparison with portfolio acquisitions.

Customization of MOB. MOB are typically highly customized and may not be easily adapted to non-healthcare-related uses. A new or replacement operator or tenant may require different features in a property, depending on that operator's or tenant's particular operations. If a current operator or tenant is unable to pay rent and vacates a property, the property owner may incur substantial expenditures to modify a property before it is able to secure another operator or tenant. Also, if the property needs to be renovated to accommodate multiple operators or tenants, the property owner may incur substantial expenditures before it is able to re-lease the space. These expenditures or renovations may have a material adverse effect on operations and the ability to make distributions to Investors.

Healthcare Regulation. The healthcare industry is heavily regulated by U.S. Federal, State and local governmental bodies. The tenants in healthcare assets generally will be subject to laws and regulations covering, among other things, licensure, certification for participation in government programs and relationships with physicians and other referral sources, and the privacy and security of individually identifiable health information. New laws and regulations, changes in existing laws and regulations or changes in the interpretation of such laws or regulations could negatively affect the financial condition of the tenants. These changes, in some cases, could apply retroactively. The enactment, timing or effect of legislative or regulatory changes cannot be predicted. In addition, certain of the MOB and healthcare-related facilities and their tenants may require licenses or certificates of need to operate. Failure to obtain a license or certificate of need, or loss of a required license would prevent a facility from operating in the manner intended. These events could adversely affect the tenants' ability to make rent payments, which may have a material adverse effect on operations and the ability to make distributions to Investors.

Storage. The self-storage market contains low barriers to entry. Due to the short-term nature of self-storage leases, storage properties also may be subject to more volatility in terms of supply and demand than other types of properties. In addition, because of the construction utilized in connection with certain self-storage facilities, it might be difficult or costly to convert such a facility to an alternative use. Thus, the liquidation value of these properties may be substantially less than would otherwise be the case if the property were readily adaptable to other uses. Finally, it is difficult to assess the environmental risks posed by such facilities due to tenant privacy, anonymity and unsupervised access to such facilities. Therefore, such facilities may pose additional environmental risks that could adversely affect the value of the investments.

Life Science Buildings. Life science building tenants require significant outlays of funds for the research and development and clinical testing of their products and technologies and many of them have a history of recurring losses. The current economic environment has significantly impacted the ability of these companies to access the capital markets, including both equity financing and debt financing. If sources of funding are unavailable to support such development, a life science tenant's business may fail.

The research and development, clinical testing, manufacture and marketing of tenants' products may require federal, state and foreign regulatory approvals. The approval process is typically long, expensive and uncertain. One or all of their products may fail to obtain the required regulatory approvals on a timely basis or at all. If a product fails to receive the required

approvals at any stage of development, it could significantly adversely affect the tenant's entire business.

Legislation to reform the U.S. healthcare system may include government intervention in product pricing and other changes that adversely affect reimbursement for life science tenants' marketable products. In addition, sales of such tenants' marketable products may be dependent on the availability and extent of reimbursement from government health administration authorities, private health insurers and other organizations. Changes in government regulations, price controls or third-party payors' reimbursement policies may reduce reimbursement for tenants' marketable products and adversely impact the tenants' businesses. Any of these events could adversely affect the tenants' ability to make rent payments, which may have a material adverse effect on operations and the ability to make distributions to Investors.

Conflicts of Interest

An investment in the Core Fund or other investment vehicle involves a number of inherent or potential conflicts of interest, which prospective investors should carefully consider before subscribing for Units. Among other things, Investors should note that Harrison Street Advisors is an affiliate of the General Partner and it will receive Management Fees based on the NAV of the Core Fund which, in turn, will be affected by the performance of the Core Fund assets.

The Core Fund or an affiliate of the General Partner may make investments in operating partners or the operating companies of operating partners. In such event, the Core Fund or an affiliate will own an interest in an investment at the property level and the operating partner level, which may create conflicts of interest.

HSRE is the sponsor of a series of closed-end real estate funds investing in the same Primary Property Types in the United States and a separate account investing real estate other than the Primary Property Types. Officers and employees of HSRE have economic interests in HSRE-sponsored funds (other than the Core Fund) and in certain separate accounts. While the investment objectives of the Core Fund or other investment vehicles may differ from the other HSRE-sponsored funds and accounts (i.e., the Core Fund will not purchase vacant land or undertake a new development where we do not expect to generate stabilized income producing returns upon completion), and investment opportunities targeted by the Core Fund are not likely to overlap with investment opportunities targeted by the other HSRE-sponsored funds and accounts, investment opportunities may be sought by more than one of the HSRE-sponsored funds and accounts if the funds on account are within the investment period. In addition, Harrison Street Advisors may serve as investment advisor to one or more separate accounts. Thus, conflicts of interest may arise in the allocation of investment opportunities between the Core Fund, any HSRE-sponsored fund or account or any HSTA-advised separate account that is operating within its investment period. If a particular investment would be appropriate for the Core Fund, one or more HSRE sponsored funds or accounts, or any HSTA-advised separate account the investment will be allocated by the HSRE Allocations Committee according to the allocation and rotation policy with a rotation list maintained by the Chief Compliance Officer. Our allocation will depend on our determination of all relevant factors such as investment objectives and cash availability. Whether an investment is approved is determined by the

investment committee of Harrison Street Advisors or the investment committee of the HSRE sponsored fund or account.

HSRE does not anticipate causing HSRE-sponsored funds to engage in any cross transactions. In the event that the Core Fund intends to purchase an investment from, or sell an investment to, another HSRE-sponsored fund, Harrison Street Advisors will first verify that the investment meets the investment strategy of the Core Fund and is in the best interests of the Core Fund. The transaction price will be supported by a fair market valuation (or fairness opinion) made by an independent appraiser. Harrison Street Advisors will provide appropriate due diligence information to the Advisory Committee of the Core Fund and will not close a cross transaction without the consent of the Advisory Committee of the Core Fund (which is authorized to seek the advice of an independent professional). Similarly, HSRE will obtain consent from the advisory committee of the HSRE-sponsored fund from which the asset will be sold. Written information regarding cross transactions will be provided to the limited partners of the Core Fund. Neither Harrison Street Advisors nor any of its affiliates will be paid broker's commissions or similar compensation from a cross transaction. However, it is possible that a cross transaction will result in incentive compensation being paid to an HSRE affiliate from a selling HSRE-sponsored fund.

In the event that the Core Fund or a HSTA-advised separate account has opportunities to participate with another HSRE-sponsored fund to acquire a portfolio of Primary Property Type assets, the Allocation Committee of HSRE will first identify any of the portfolio properties that meet the investment strategy of the Core Fund or HSTA-advised separate account and the Investment Committee of the Core Fund, or the separate account client, if applicable, will determine whether or not the acquisition of the identified properties is in the best interest of the Core Fund or such client. The allocation of the transaction price will take into account appropriate physical, financial and market factors in consultation with the appraisal management firm, brokers and other market participants. Information regarding the portfolio acquisition will be provided to the limited partners of the Core Fund in a quarterly report.

The officers and employees of HSRE also provide services to the HSRE-sponsored U.S. closed-end real estate investment funds, a separate account and the Europe funds, as well as to other businesses and investments. Those persons may devote significant time in the future to the management of their other existing investments and professional activities, although certain executives of HSRE will devote substantially all of their business activities to the Core Fund and HSTA-advised separate accounts, except for any time devoted to the other HSRE-sponsored funds and any future HSRE-sponsored funds.

No restrictions are placed upon HSRE or its affiliates with respect to existing real estate investments or non-real estate investments that are not owned by the Core Fund. Further, HSRE, the General Partner and/or their affiliates, principals and senior executives may purchase property that meets the Core Fund's and HSTA-advised separate accounts' investment criteria in order to complete a like-kind exchange with respect to any properties owned by HSRE, the General Partner and/or their affiliates, principals and senior executives.

Harrison Street Advisors may, in certain instances, cause the Core Fund and an asset management client or separate account client to form a joint venture to acquire, finance and own

specifically identified Primary Property Type assets. In such instance, the other client may compensate HSTA at rates that differ from the NAV-based fees paid by the Core Fund. HSTA will only form such joint ventures when it believes that the transaction is in the best interest of both clients.

Neither HSRE nor any affiliate of HSRE is prohibited from purchasing for its own account a Primary Property Type investment at any time that the HSRE/Harrison Street Advisors investment committee determines that the Core Fund does not have sufficient capital and resources to purchase the Primary Property Type asset for its own account.

Item 9 - Disciplinary Information

Neither Harrison Street Advisors nor any of its management persons or HSRE Controlling Principals is or has been involved in any legal or disciplinary actions that would be material to an Investor or client in evaluating Harrison Street Advisors or the integrity of our management.

Item 10 - Other Financial Industry Activities and Affiliations

Neither Harrison Street Advisors nor any of its management persons is registered or has an application pending to register as a broker-dealer or a registered representative of a broker-dealer, as a futures commission agent, commodities pool operator, commodities trading adviser or an associated person of any of the foregoing.

Harrison Street Advisors is a wholly owned subsidiary of HSRE, and as such is managed by HSRE. Harrison Street Advisors expects to receive a variety of services from HSRE. For example, we will obtain general real estate market and economic information from HSRE and we share executive, back office and administrative personnel with HSRE. HSRE is a Chicago-based real estate investment management firm that currently operates five private closed-end United States real estate funds a joint venture investing in real property and a closed-end Europe Fund as well as the Core Fund. As of December 31, 2017, the HSRE real estate investment funds owned interests in more than \$13.5 Billion (utilizing a conversion rate of US\$1.2006 to €1.00 to convert European Fund amounts to U.S. Dollars) in real estate assets, including operating properties and projects under development.

Christopher Merrill, Christopher Galvin and Michael Galvin are the members of the Board of Managers of HSRE. Messrs Galvin, Merrill and Galvin, along with Dean Egerter, Robert Mathias, Stephen Gordon, Joey Lansing, Michael Gordon and Geoff Regnery comprise the investment committee of Harrison Street Real Estate Management, LLC and of Harrison Street Advisors. Mr. Merrill is President and Chief Executive Officer of HSRE and Stephen Gordon, our General Counsel, is General Counsel to, and a Senior Managing Director of, HSRE.

Christopher Galvin and Michael Galvin, two of the three controlling principals of HSRE, are also principals of Gore Creek Asset Management, LLC, a family office (“Gore Creek”), and of Harrison Street Capital, LLC, also part of the family office (“HSC”). We do not receive real estate market or economic information from Gore Creek or HSC, share personnel with Gore Creek or HSC, or provide any investment advice to Gore Creek or HSC. Neither Gore Creek nor HSC will invest in the Core Fund.

HSRE Securities Advisors, LLC, a wholly-owned subsidiary of HSRE, a registered investment advisor, is a sponsor of a hedge fund, a private fund and separate accounts. Mr. Merrill and Stephen Gordon are two of the three managers of HSRE Securities Advisors, LLC. The primary focus of HSRE Securities Advisors, LLC is to invest on a discretionary basis in publicly traded securities of REITs and property management and other real estate related operating companies. At December 31, 2017, HSRE Securities Advisors, LLC had approximately \$5 Million of regulatory assets under management.

Student housing properties owned by certain HSRE-sponsored investment vehicles have leases that obligate the tenant to provide evidence of insurance or to make an additional monthly payment in consideration for the property owner waiving liability for damage to the unit of up to \$100,000 caused by the tenant. The property owner, in turn, purchases an insurance policy from Riverpoint, Ltd. ("Riverpoint"), a captive insurance company owned by HSRE, to protect it against losses incurred as a result of the liability waiver. The insurance contract between the property owning entities and Riverpoint is on market terms and is administered on an arm's-length basis. On an annual basis an analysis will be performed to make sure that the amount of the insurance premium and coverage are in line with the market and that the policy administration is on an arm's-length basis.

The potential exists for material, non-public information to pass between Harrison Street Advisors, HSRE, Gore Creek, HSC, and HSRE Securities Advisors, as all share a suite of offices. Procedural, physical and legal barriers have been put in place to minimize the likelihood of such an event. More information is available upon request to Investors in the Code of Ethics adopted by HSRE, Harrison Street Advisors and their affiliates (the "Code") and the Harrison Street Advisors Policies and Procedures Manual.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

We follow a Code of Ethics ("Code") that is designed to comply with SEC Rule 204A-1. A copy of our Code is available to current and prospective Investors upon request.

The Code establishes rules of conduct designed to, among other things, govern personal securities trading activities in the accounts of Access Persons (as defined in the Code). In addition, the Code includes safeguards designed to avoid and/or mitigate conflicts of interests that could adversely affect our clients. In addition to requiring compliance with the applicable securities laws, the Code establishes policies and procedures designed to prevent the misuse of material, non-public information (including information regarding the Core Fund and Investors), and identifies activities that are either expressly prohibited or that require Chief Compliance Officer and/or designee approval. Matters that could give rise to an appearance of impropriety, such as most business gift giving, solicitation, serving on boards of directors of public companies, and political contribution payments and solicitation also require prior approval by our Chief Compliance Officer and/or designee. The Code applies to all HSRE personnel and principals.

The Code is based upon the principle that Harrison Street Advisors and applicable HSRE personnel and principals providing services to or on behalf of Harrison Street Advisors owe a

fiduciary duty to our clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of those of our clients, (ii) taking inappropriate advantage of their position or relationship with Harrison Street Advisors, and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that high ethical standards continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct.

Harrison Street Advisors and all applicable HSRE principals and personnel are subject to the following specific fiduciary obligations when dealing with the Core Fund and its Investors:

- The duty to have a reasonable, independent basis for the investment advice provided;
- The duty to seek best execution for a client's transactions where Harrison Street Advisors is in a position to direct brokerage transactions for the client;
- The duty to ensure that investment advice is suitable to meeting the client's objectives, needs and circumstances; and
- A duty of loyalty.

Interested Transactions

No Harrison Street Advisors Access Person shall recommend any business transaction, engagement or investment to a Fund-client, separate account client or HSRE-sponsored fund without having disclosed to the Investment Committee and if material, the Advisory Committee of the applicable fund, his or her direct or indirect interest, if any, in such transaction, engagement or investment, including without limitation:

- Any direct or indirect beneficial ownership of any securities of a transaction party;
- Any contemplated transaction by such person in such investment;
- Any position with a transaction party or its affiliates; and
- Any present or proposed business relationship or transaction between such transaction party or its affiliates and such Access Person or any party in which such Access Person has a significant interest, including, without limitation, HSRE, other HSRE-sponsored fund, , HSRE Securities Advisors, LLC, , HSC and Gore Creek.

We have adopted the following principles governing personal investment activities by HSRE principals and personnel providing services to or on behalf of Harrison Street Advisors:

- The interests of client accounts will at all times be placed first;
- All personal securities transactions will be conducted in such manner as to address any actual or potential conflict of interest or any abuse of an individual's position of trust and responsibility; and

- Access Persons must not take inappropriate advantage of their positions.

Purchases and sales of publicly traded securities of companies where we may possess material, non-public information, purchases of securities in initial public offerings and purchases of securities in limited offerings (private placements) by our Access Persons and certain of their family members require pre-approval by our Chief Compliance Officer or his or her designee.

Specific, detailed procedures have been put into place by HSRE to address any potential conflicts of interest. More information is available in the Code and in the Harrison Street Advisors Policies and Procedures Manual, copies of which are available to clients and Investors upon request.

Item 12 - Brokerage Practices

Except occasionally in connection with the temporary investments of cash received from Commitment fundings pending investment, and cash flow from operations or the sale or refinancing of assets pending further investment or distribution, we expect to neither employ nor engage a securities broker-dealer for any transaction related to any investments. HSTA may aggregate securities orders made on behalf of the Core Fund and its parallel funds. We expect to hold cash reserves in Core Fund bank and money market fund accounts. We do not have any formal soft dollar arrangements and do not expect to have this type of arrangement in the future.

We have the discretion, under limited circumstances, to make investments in equity interests and debt instruments secured by mortgages on Preferred Property Types of real estate that we intend to acquire. When this occurs, we may execute the transactions through a broker-dealer and our objective will be to seek “best execution” (that is, the most favorable price and trade execution). Our effort to seek best execution on any individual transaction depends substantially on our judgment, knowledge and experience in evaluating the counterparties’ and service providers’ reliability and capability based on previous and pending transactions effected by the broker-dealer for the client’s account. These factors include, among other things, execution quality and capabilities including, with regard to market making, commissions charged by and gross compensation paid to such counterparty, and special knowledge of the real estate securities and instruments markets. Research and other services which are provided by the broker-dealer and which are expected to enhance the general portfolio management capabilities of HSTA may also be factors in selecting a broker-dealer for a HSTA client. Any broker-dealer will receive separate compensation for brokerage services with respect to transactions executed for a HSTA client.

Both Harrison Street Advisors and HSRE Securities Advisors, LLC have adopted policies and procedures that generally prohibit principal and agency cross transactions except in compliance with Section 206(3) of the Advisers Act.

Item 13 - Review of Accounts

The portfolios under the supervision of Harrison Street Advisors are monitored by the Portfolio Management team led by Joseph Lansing, Senior Managing Director and Senior Portfolio Manager, on a regular and current basis. We may cause our asset managers, and when necessary

our investment committee to review on an expedited basis the assets of any of the investment vehicles following a unique occurrence in the financial industry or market generally.

The Harrison Street Advisors' investment committee meets as necessary to review general portfolio composition, investment opportunities, market conditions, potential conflicts, and recent trading activities. The investment committee consists of seven persons, each of whom is either a senior HSRE management, a HSRE Controlling Principals or both.

Reports

Investors in the Core Fund generally receive written quarterly reports which include capital balance, Core Fund performance statistics and NAV information. Investors in the Core Fund also receive annual audited financial statements for the Core Fund and REIT subsidiaries of the Core Fund. Investors in the Core Fund should carefully review the quarterly reports and the annual audited financial statements for the Core Fund and REIT subsidiaries of the Core Fund. Our separate account and asset management client receives written quarterly reports which include capital balances, portfolio performance statistics and portfolio NAV information. The separate account and asset management client also receives annual audited financial statements for the joint venture in which it holds an interest as well as the subsidiary REIT of that joint venture.

Certain Investors in the Core Fund may request information relating to the Core Fund and, to the extent such information is readily available or may be obtained without unreasonable effort or expense, we generally will provide such Investors with the information requested. Investors that request and receive such information will consequently possess information regarding the business and affairs of the Core Fund that may not be known to other Investors. As a result, those Investors may be able to take actions on the basis of such information which, in the absence of such information, other Investors do not take.

Similarly, separate account and asset management clients may request information relating to the properties in which they hold interests and to the extent such information is readily available or may be obtained without unreasonable effort or expense, we generally will provide such client with the information requested. As a result, the management client may be able to call upon the Core Fund to take action based on such information which, in the absence of such information, an Investor in the Core Fund cannot take.

Item 14 - Client Referrals and Other Compensation

Harrison Street Advisors does not directly or indirectly compensate any person for client referrals. We do not receive any economic benefits from non-Clients in connection with the provision of investment advice to the Core Fund.

The General Partner may retain placement agents to market the Units in the Core Fund from time to time. Any such placement agent's fee may be based on a percentage of the Commitments of Investors who they introduce to the Core Fund or other investment vehicle, however, no placement agent fees will be charged to or paid by the Core Fund or other investment vehicle.

Item 15 - Custody

Because the General Partner of the Core Fund is an affiliate of Harrison Street Advisors, we are deemed to have “custody” within the meaning of SEC Rule 206(4)-2. The General Partner will provide each Investor in the Core Fund with written quarterly reports which will include capital balance, Core Fund performance statistics and NAV information. Investors also will receive audited financial statements for the Core Fund and its REIT subsidiaries that comply with U.S. generally accepted accounting principles within 120 days following the Core Fund’s fiscal year end. Investors should carefully review the quarterly reports and annual audited financial statements for the Core Fund and its REIT subsidiaries.

HSTA is not expected to have custody over the funds or securities of any HSTA-advised separate account client. In cases where HSTA is deemed to have custody, HSTA will obtain either an audit or a surprise custody audit exam.

Item 16 - Investment Discretion

We have executed a written investment management agreement with the Core Fund (and have or will have a written investment management agreement with any Parallel Vehicle) that grants us discretion to manage the Core Fund (and such Parallel Vehicle) investments. We have discretionary authority for the investments of the Commitments and cash assets, subject to its specific investment guidelines, investment approval authority retained for legal compliance purposes, and to the restrictions set forth in those agreements and in the Core Fund Limited Partnership Agreement, all as more fully described in the PPM. We do not expect to have discretionary authority for investments by HSTA-advised separate account clients unless directed in the governing documents of the specific mandate.

Item 17 - Voting Client Securities

Harrison Street Advisors does not intend to accept authority to vote proxies on behalf of the Core Fund or any other client. Rather, any proxies received by Harrison Street Advisors for a specific investment vehicle will be delivered to its General Partner, who will vote the proxies on behalf of such Fund and to the separate account client who will vote the proxy directly. We will instruct the General Partner to vote proxies in accordance with policies and procedures which are designed to ensure compliance with Rule 206(4)-(6) of the Advisers Act. In this regard, with respect to the Core Fund proxies will be voted on behalf of the Core Fund based on a determination of the best interest of the Core Fund, consistent with the objective of maximizing long-term investment returns for the Investors. Where the Core Fund has made an investment in equity interests or debt instruments secured by mortgages on properties with a view towards acquiring the underlying properties, we expect that the General Partner will vote proxies to facilitate such transaction taking into account the investment goals and objectives of the Core Fund. No Investor may direct the voting of proxies on any particular matter. Investors may obtain information on how proxies have been voted by the General Partner upon written request addressed to us at our office.

Copies of our Proxy Voting Policy and how proxies, if any, have been voted will be made available upon written request.

The Core Fund may be subject to conflicts of interest in the voting of proxies. A potential conflict of interest may occur where an investment management client of HSRE Securities Advisors, LLC has a direct or indirect economic stake in the outcome of a proxy vote that is different from the Core Fund's stake. When such a potential conflict arises between Harrison Street Advisors and HSRE Securities Advisors, LLC or any of their respective affiliates or clients, the matter will be evaluated to determine whether an actual conflict exists and we will so advise the General Partner. Where an actual material conflict exists, the General Partner will vote Core Fund proxies as it deems appropriate, and the portfolio manager at HSRE Securities Advisors, LLC will vote the proxies in its possession and control as they deem appropriate.

Item 18 - Financial Information

Harrison Street Advisors is not required to include in this Brochure a balance sheet for its most recent fiscal year. We are not aware of any financial condition of Harrison Street Advisors that impairs our ability to meet contractual and fiduciary commitments to the Core Fund or its Investors or any other client, and has not been the subject to any bankruptcy petition.