

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name InterCure Ltd.		2 Issuer's employer identification number (EIN)	
3 Name of contact for additional information Amos Cohen (CFO)	4 Telephone No. of contact +972-58- 6668686	5 Email address of contact amos@intercure.co	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 85 Medinat ha-Yehudim Street		7 City, town, or post office, state, and ZIP code of contact Herzliya, 467667Q, Israel	
8 Date of action August 24, 2026	9 Classification and description Reverse Share Split		
10 CUSIP number M549GJ 368	11 Serial number(s)	12 Ticker symbol INCR	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ► **On August 24, 2026, InterCure Ltd. (the "Company") effected a 1-for-5 reverse share split (the "Reverse Share Split") of the Company's issued and outstanding ordinary shares, no par value per share (the "Ordinary Shares"), pursuant to which every five Ordinary Shares issued and outstanding immediately before the Reverse Share Split (the "Old Ordinary Shares") were consolidated into one Ordinary Share (the "New Ordinary Share"). In accordance with the Company's articles of association, no fractional New Ordinary Shares were issued, and any fractional New Ordinary Shares resulting from the Reverse Share Split were rounded down to the nearest whole New Ordinary Share. Proportionate adjustments were also made to the Ordinary Shares underlying the Company's outstanding options, warrants and other equity-based awards and securities, and to the applicable exercise prices, in accordance with their respective terms. Company shareholders are urged to refer to the Company's press release dated August 19, 2026 and its Report of Foreign Private Issuer on Form 6-K furnished to the U.S. Securities and Exchange Commission on August 11, 2026, and to consult with their own tax advisors regarding the consequences of the Reverse Share Split, including the applicability and effect of U.S. federal, state and local and foreign tax laws.**

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► **The Reverse Share Split was intended to qualify as a "recapitalization" within the meaning of Section 368(a)(1)(E) of the Internal Revenue Code of 1986, as amended (the "Code"). Subject to the treatment of any fractional share interest, the aggregate adjusted tax basis of the New Ordinary Shares received by a U.S. shareholder in the Reverse Share Split should equal the aggregate adjusted tax basis of the Old Ordinary Shares exchanged therefor. Accordingly, the adjusted tax basis per New Ordinary Share generally should equal the aggregate adjusted tax basis of the corresponding Old Ordinary Shares divided by the number of New Ordinary Shares received in exchange therefor.**
A shareholder that acquired Old Ordinary Shares at different times or at different prices must allocate the adjusted tax basis separately with respect to each block of Old Ordinary Shares exchanged in the Reverse Share Split. Because fractional New Ordinary Shares were rounded down and no cash was paid in respect of such fractional interests, shareholders should consult their own tax advisors regarding the treatment of any adjusted tax basis attributable to an eliminated fractional share interest.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► **The aggregate adjusted tax basis of the New Ordinary Shares received by a shareholder in the Reverse Share Split generally should equal the aggregate adjusted tax basis of the Old Ordinary Shares exchanged therefor, subject to the treatment of any fractional share interest. Accordingly, a shareholder's adjusted tax basis per New Ordinary Share generally should equal the aggregate adjusted tax basis of the corresponding five Old Ordinary Shares. Stated differently, if all relevant Old Ordinary Shares were acquired in the same transaction, the adjusted tax basis per New Ordinary Share generally should equal five times the adjusted tax basis per Old Ordinary Share. Shareholders who acquired Old Ordinary Shares at different times or at different prices must allocate their adjusted tax basis separately with respect to each block of Old Ordinary Shares exchanged in the Reverse Share Split. The calculation does not depend on the market value of the Ordinary Shares or require a valuation date because the Reverse Share Split is intended to constitute a tax-deferred recapitalization with a carryover basis. Because fractional New Ordinary Shares were rounded down and no cash was paid in respect of such fractional interests, shareholders should consult their own tax advisors regarding the treatment of any adjusted tax basis attributable to an eliminated fractional share interest and their specific U.S. federal income tax consequences, including the computation of gain or loss and adjusted tax basis.**

Part II **Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ►
Sections 354, 358, 368(a)(1)(E), 1001, 1221 and 1223 of the Internal Revenue Code of 1986, as amended, are the principal Code provisions upon which the U.S. federal income tax treatment of the Reverse Share Split is based.

18 Can any resulting loss be recognized? ►
A U.S. shareholder generally should not recognize gain or loss upon the exchange of Old Ordinary Shares for New Ordinary Shares pursuant to the Reverse Share Split. However, because fractional New Ordinary Shares were rounded down and no cash or other consideration was paid in respect of such fractional interests, shareholders should consult their own tax advisors regarding whether any loss may be recognized with respect to an eliminated fractional share interest.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ►
The basis adjustments resulting from the Reverse Share Split should be taken into account in the taxable year of a Company shareholder in which the Reverse Share Split occurred (e.g., 2026 for calendar-year taxpayers). The holding period of the New Ordinary Shares received in the Reverse Share Split generally should include the holding period of the corresponding Old Ordinary Shares exchanged therefor, provided that the Old Ordinary Shares were held as capital assets at the time of the Reverse Share Split. Shareholders who acquired Old Ordinary Shares in separate transactions should maintain separate tax-basis and holding-period records for each applicable block of shares.

Sign Here	Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.				
	Signature ► 		Date ► October 1st, 2026		
Paid Preparer Use Only	Print your name ► Amos Cohen		Title ► Chief Financial Officer		
	Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
	Firm's name ►			Firm's EIN ►	
	Firm's address ►			Phone no.	

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054