

## General Solicitation Rules

1 All discussions and transactions must occur when the client is outside of the United States. If you receive a call from a client, verify that the client is outside of the United States.

2 Under no circumstances can an application be completed and signed in the United States or any other country which restricts such activities.

3 Availability is limited to residents of eligible countries and excludes residents and citizens of Bermuda or a United States person.

A "United States person" is:

- Any individual who is a citizen of the United States.
- Any individual who is a resident of the United States for United States income tax purposes.
- A corporation, partnership or other entity created or organized under the laws of the United States or any of the States or having its principal place of business in the United States.
- A United States estate or United States trust, the income of which is subject to United States federal income tax regardless of its source and regardless of whether such income is effectively connected with a United States trade or business or having its principal place of business in the United States.
- Any United States corporation, United States partnership, United States trust, United States estate or other entity that is organized principally for passive investment and in which one or more individuals or entities described above hold units of participation representing in the aggregate 10% or more of the beneficial interests in the entity or which has as a principal purpose the facilitation of investment by any such person or entity in a commodity pool with respect to which the operator is exempt from certain requirements of 17 C.F.R. Part 4 of the regulations of the Commodity Futures Trading Commission by virtue of its participants not be such persons or entities.
- A pension plan for the employees, officers or principals of an entity created, organized or existing in or under the laws of the United States or which has its principal place of business within the United States.
- Any trust, if a court in the United States is able to exercise primary supervision over the administration of the trust.
- Any trust, if one or more United States person has the authority to control all substantial decisions of the trust.
- Any other person or entity who is treated as a United States person under Section 7701(a)(30) of the United States Internal Revenue Code.

4 All solicitation activity should be to existing or referral relationships. No prospecting, advertising or cold calling to the general public is allowed.

5 All documents must be delivered to the Trust Administrator in Bermuda.

## Solicitation Rules While in the United States

1

While prospective clients are physically present in the United States, an Advisor MAY:

- Advise the client of the general availability of the international investment plan and of its general characteristics. DO NOT specifically identify any plan.
- Inform the client you are prohibited by law from discussing specific investment plans.
- Refer the client to a website for plan information.
- Process an Order Form on the website for an information package to be sent to the client (cannot be mailed to a US address).
- Refer the client to a website for general plan information.

2

While the prospective client is physically present in the United States, you MAY NOT:

- Conduct any face-to-face discussions about a specific international plan.
- Discuss specific plan details.
- Deliver any specific plan form, application or other sales literature in the United States.
- Make any offer of sale or accept any order for the purchase of a specific international plan.
- Conduct seminars, advertising or other promotional activities related to a specific international plan.

3

While prospective clients are NOT physically present in the United States, an Advisor MAY do all things necessary to present a plan and conclude an investment. To that end, an Advisor should:

- Inquire about the client's age, investment objectives and ability to invest in a plan.
- Inquire into the source of the funds to be invested.
- Assist the client over the phone with the completion of the forms.