

Risk Disclosure Statement

THE RISK OF LOSS IN TRADING COMMODITIES CAN BE SUBSTANTIAL. YOU SHOULD THEREFORE CAREFULLY CONSIDER WHETHER SUCH TRADING IS SUITABLE FOR YOU IN LIGHT OF YOUR FINANCIAL CONDITION. THE HIGH DEGREE OF LEVERAGE THAT IS OFTEN OBTAINABLE IN COMMODITY TRADING CAN WORK AGAINST YOU AS WELL AS FOR YOU. THE USE OF LEVERAGE CAN LEAD TO LARGE LOSSES AS WELL AS GAINS.

IN SOME CASES, MANAGED COMMODITY ACCOUNTS ARE SUBJECT TO SUBSTANTIAL CHARGES FOR MANAGEMENT AND ADVISORY FEES. IT MAY BE NECESSARY FOR THOSE ACCOUNTS THAT ARE SUBJECT TO THESE CHARGES TO MAKE SUBSTANTIAL TRADING PROFITS TO AVOID DEPLETION OR EXHAUSTION OF THEIR ASSETS. THE DISCLOSURE DOCUMENT CONTAINS A COMPLETE DESCRIPTION OF THE PRINCIPAL RISK FACTORS AND EACH FEE TO BE CHARGED TO YOUR ACCOUNT BY THE COMMODITY TRADING ADVISOR ("CTA").

THE REGULATIONS OF THE COMMODITY FUTURES TRADING COMMISSION ("CFTC") REQUIRE THAT PROSPECTIVE CUSTOMERS OF A CTA RECEIVE A DISCLOSURE DOCUMENT WHEN THEY ARE SOLICITED TO ENTER INTO AN AGREEMENT WHEREBY THE CTA WILL DIRECT OR GUIDE THE CLIENT'S COMMODITY INTEREST TRADING AND THAT CERTAIN RISK FACTORS BE HIGHLIGHTED. THIS DOCUMENT IS READILY ACCESSIBLE AT THIS SITE. THIS BRIEF STATEMENT CANNOT DISCLOSE ALL OF THE RISKS AND OTHER SIGNIFICANT ASPECTS OF THE COMMODITY MARKETS. THEREFORE, YOU SHOULD PROCEED DIRECTLY TO THE DISCLOSURE DOCUMENT AND STUDY IT CAREFULLY TO DETERMINE WHETHER SUCH TRADING IS APPROPRIATE FOR YOU IN LIGHT OF YOUR FINANCIAL CONDITION. YOU ARE ENCOURAGED TO ACCESS THE DISCLOSURE DOCUMENT BY CLICKING THE LINKS PROVIDED AT [FORMS.ALTAVRA.COM](https://forms.altavra.com). YOU WILL NOT INCUR ANY ADDITIONAL CHARGES BY ACCESSING THE DISCLOSURE DOCUMENT. YOU MAY ALSO REQUEST DELIVERY OF A HARD COPY OF THE DISCLOSURE DOCUMENT AT [FORMSBYMAIL.ALTAVRA.COM](https://formsbymail.altavra.com), WHICH WILL ALSO BE PROVIDED TO YOU AT NO ADDITIONAL COST. THE CFTC HAS NOT PASSED UPON THE MERITS OF PARTICIPATING IN ANY OF THESE TRADING PROGRAMS NOR ON THE ADEQUACY OR ACCURACY OF ANY OF THESE DISCLOSURE DOCUMENTS.

QUESTIONS OR COMMENTS: PLEASE EMAIL CLIENTSERVICES@ALTAVRA.COM OR CALL 1-800-998-7870.

For the up-to-date performance information on 90+ managed accounts, please access the alternative investment database*.

To access the database:

1. Request an access key at altavra.com.
 - The access key will be automatically generated and sent immediately to your email address.
2. After you receive your access key, you can follow the instructions in the email to access the database.
3. In the database, click on "List of Programs" at the top of the page to view all of the programs in the database.

*PLEASE NOTE: There is no fee to access the database. This is not a trial access. The pin number does not expire.

THE RISK OF LOSS IN TRADING FUTURES, OPTIONS AND OFF-EXCHANGE FOREX CAN BE SUBSTANTIAL.
PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

Program Description: Investment Objective

The investment objective of the Winton Capital Management's Diversified Program is to achieve long-term capital appreciation through compound growth. This goal is achieved by pursuing a diversified trading scheme that does not necessarily rely upon favorable conditions in any particular market, or on market direction.

The Diversified Program seeks to combine liquid financial instruments offering positive but low Sharpe ratios (meaning that profits have been achieved with a certain level of risk) and generally low correlation over the long term to other markets such as equities and fixed income. Please note, however, that there is no assurance that the Diversified Program will have low correlation to other markets, even over the long-term, and over the short-term the Diversified Program may be highly correlated to other markets. Past Results are not necessarily indicative of future results. The risk of loss in trading futures, options and off-exchange forex can be substantial.

Program Description: A Systematic Investment Approach

The Diversified Program employs what is traditionally known as a “systematic” approach to trading financial instruments. In this context, the term “systematic” implies that the vast majority of the trading decisions are executed, without discretion, either electronically or by a team responsible for the placement of orders, based upon the instructions generated by the Winton Computer Trading System. The majority of trades in the Diversified Program are in fact executed electronically. The Diversified Program blends short-term trading with long-term trend following, using multiple time frames in addition to multiple models. As its name implies, the Diversified Program allocates for maximum diversification. A sophisticated system of risk management is evident in all aspects of the program.

Program Description: The Trading System

The Winton Computer Trading System is a proprietary, computer-based system best described as the “output” of a complex schema of numerous computer programs and subprograms developed by Winton’s research team. The Trading System is maintained and managed by Winton’s Production Team, the team responsible for encoding and running the computer programs and sub-programs.

The Winton Computer Trading System instructs the Diversified Program on how to respond to unfolding market events in order to profit from price movements. The Trading System tracks the daily price movements and other data from the markets it follows, and carries out certain computations to determine each day how long or short the portfolio should be to maximize profit within a certain range of risk. If rising prices are anticipated, a long position will be established; a short position will be established if prices are expected to fall. As a result of its statistical research, Winton believes that each trade executed by the Diversified Program will have a slight statistical advantage leading to profits over time. Past Results are not necessarily indicative of future results. The risk of loss in trading futures, options and off-exchange forex can be substantial.

THE RISK OF LOSS IN TRADING FUTURES, OPTIONS AND OFF-EXCHANGE FOREX CAN BE SUBSTANTIAL.
PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

Program Description: Technical System Using Both Trend-Following & Non-Directional Trading

The Diversified Program can be thought of as more “technical” than “fundamental” in nature. The term “technical analysis” is generally used to refer to analysis based on data intrinsic to a market, such as price and volume. It is often contrasted with “fundamental analysis” that relies upon analysis of factors external to a market, such as crop conditions, the weather or supply and demand. One feature of a trend-following system is that it attempts to take advantage of the observable tendency of the markets to trend, and to tend to make exaggerated movements in both upward and downward directions. These exaggerated movements can be thought of as resulting from the influence of crowd psychology, or the herd instinct, amongst market participants.

Trend-following systems are frequently unprofitable for long periods of time in particular markets or market sectors, and sometimes for spells of longer than a year or so, even in large portfolios. However, in Winton Capital Management’s experience, over a span of years such an approach has shown to be profitable in our track record to date. Past Results are not necessarily indicative of future results. The risk of loss in trading futures, options and off-exchange forex can be substantial.

The Diversified Program relates the probability of the size and direction of future price movements with certain indicators derived from past price movements to produce algorithms that characterize the degree of trending of each market at any point in time. While all trend-following systems function in this way to some degree, the unique edge possessed by the Winton Trading System lies in the quality of the research underlying its algorithms. These enable Winton’s Trading System to suffer smaller losses during the markets’ inevitable whipsaw periods and to take better advantage of significant trends when they occur. Winton Capital Management is continually involved in improving upon its models through its commitment to research.

In addition to its trend-following models, the Diversified Program contains certain “nondirectional” models that derive their forecasts from factors often excluded by technical analysis. In these quantitative systems the primary input is likely to be information about the yield curve or an economic variable rather than market price. These models work in the same way as those based on technical analysis, except that they use a different set of forecasting variables.

Program Description: A Trading System Subject to Constant Adaption

The Winton Computer Trading System instructs and adapts the Diversified Program’s trading exposures automatically and continuously. As is to be expected with any research-driven trading system, the Winton Computer Trading System is dynamic. It is subject to modification over time as new relationships are discovered. This research may result in the development of additional computer models or revisions to existing models.

Examples of research and investigation that might lead to the modification of the Winton Computer Trading System include research pointing to changes in the liquidity or volatility of markets, the interpretation or meaning of data or the

THE RISK OF LOSS IN TRADING FUTURES, OPTIONS AND OFF-EXCHANGE FOREX CAN BE SUBSTANTIAL.
PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

long-term expectation of market interrelationships. Another key factor contributing to change is simply the availability of new data.

In short, the Diversified Program relies not just on the trading system, but a process. Inevitably, as a result of research developments, Winton Capital Management must make decisions about the timing, frequency and size of modifications to the trading system. Certain changes may occur on a daily basis whilst others may involve more significant adjustments and therefore occur less frequently. Generally, non-substantive changes may be carried out to the trading system at the discretion of Winton Capital Management's CIO and the Production Team, or respective equivalent teams in the case of Winton's cash equity strategy and high frequency trading strategy. However, material changes require the approval of both Winton's Trading System Committee and Winton's Chairman. Its Trading System Committee meets monthly, and its membership is comprised of all senior heads of Winton's research teams, the Chairman, the CIO, the deputy CIO, COO, CEO and the Head of Risk Management.

Program Description: Responses to Unusual Circumstances

Occasionally, external, unforeseen or dramatic events may impact the markets. These exceptional market events by their very nature are often difficult to predict and have uncertain consequences. Examples of such exceptional market events include loss of market liquidity, the threat of counterparty risk as presented in the credit default swap debacle of 2008, the closure of an exchange (as occurred after the terrorist attacks of September 2001), the introduction of the Euro, the closure of the tin contract in 1984, the suspension of the Hong Kong Futures Exchange in 1987 and the suspension of trading in the Malaysian Ringgit in 1997.

Winton Capital Management's trading principals (Winton's Chairman and CIO) may decide that such events fall entirely outside the scope of the research upon which the Diversified Program is based and may determine to exercise some discretion rather than follow the dictates of the system. Whilst discretionary inputs are generally not essential to the effectiveness of a "systematic" trading model, it is nonetheless important to recognize that given the often rapid and unpredictable nature of some market events, not every decision to change the trading system can be conceived as entirely "systematic" and may be more "discretionary" in nature. Examples of discretionary actions might include decreasing the margin-to-equity ratio, liquidating all positions in certain markets or declining to execute an order generated by the trading system. Such discretionary decision-making would normally only be taken in order to reduce risk and would generally be temporary in nature. It is important to stress that these acts may not enhance the performance of the Diversified Program over what might have otherwise been achieved without the exercise of such discretion.

Program Description: The Capacity of the Diversified Program

At present, the Diversified Program has no pre-set capacity limit. This is not to suggest Winton Capital Management's lack of concern about capacity; indeed, it is an issue of great importance to Winton's research team and significant resource is dedicated to understanding factors that impact upon it. Winton Capital Management believes that its ability to manage

THE RISK OF LOSS IN TRADING FUTURES, OPTIONS AND OFF-EXCHANGE FOREX CAN BE SUBSTANTIAL.
PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

capacity is, to a degree, related to the success of its ongoing research initiatives in this area. For example, part of Winton Capital Management's research is focused on the studying of the mechanics of open interest in order to better understand liquidity in global futures markets, looking beyond Winton at the industry as a whole. Winton may, in its absolute discretion and at any time, impose or modify the capacity limits of the Diversified Program.

Program Description: The Diversified Program - Portfolio Composition

The Diversified Program tracks approximately 100 diversified, highly liquid financial instruments. At any point in time, it may be holding long or short positions or hold no position at all in each of the markets it follows. The Diversified Program's portfolio may consist mainly of positions in the following futures markets: stock indices; bonds; short-term interest rates; currencies; precious metals; base metals; crops; livestock; and energies. In addition, the Diversified Program may trade in certain OTC instruments, such as, but not limited to, forward contracts on foreign exchange and interest rates and swaps. All OTC FX or currency instruments are off-exchange foreign currency transactions and Winton Capital Management does not engage in retail forex transactions. In addition, the Diversified Program may also trade in government securities such as bonds and other similar instruments, listed cash equities and CFDs. Through its research initiatives, Winton Capital Management is constantly looking for new opportunities to add eligible markets to the portfolio, thus further increasing the portfolio's diversification.

Program Description: Emphasis on Diversification

The Diversified Program strives to maintain a diversified portfolio because holding positions in a variety of unrelated markets has been shown, over time, to decrease system volatility. Research has demonstrated that use of a sophisticated and systematic schema for placing orders in a wide array of markets increases the possibility that an overall profit may be realized after a sufficient period of time. Whilst Winton Capital Management intends to seek to diversify the portfolio as it deems appropriate and consistent with the investment objective of the Diversified Program, the extent of diversification of the portfolio may change from time to time. If the portfolio is concentrated in a small number of investments, the portfolio will be subject to a greater level of volatility.

Program Description: Emphasis on Managing Risk

The management of risk is an integral part of the Winton Computer Trading System. Return and risk are two sides of the same coin. It is impossible to achieve a given level of return without accepting a certain amount of risk. Winton Capital Management's focus within risk management is on targeting, measuring and managing risk. Owing to the leverage inherent in futures trading, position sizes are set according to Winton Capital Management's expectation of the risk that such positions will provide rather than the amount of capital required to fund such positions. In the experience of Winton Capital Management's management, efforts to preserve capital have a greater effect on rate of return than does the identification of profitable trading opportunities. The following serve as examples, but do not begin to describe the many efforts Winton makes to attempt to limit risk. However, there is no assurance that any of these efforts will succeed in lessening the possibility or size of a loss.

THE RISK OF LOSS IN TRADING FUTURES, OPTIONS AND OFF-EXCHANGE FOREX CAN BE SUBSTANTIAL.
PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

Program Description: The Setting of Volatility Estimates and Gearing

Each day, the Winton Computer Trading System sets volatility parameters (known as the “instantaneous forecast standard deviation”) for each position held in the portfolio. The purpose of these parameters is to estimate the likely size of a market shift (whether up or down), in much the same way as the futures exchanges estimate the likely market shift when deciding how to set the initial margin for a future or the daily price limits for a market.

The primary determinant of the daily volatility parameters is the amount of leverage or level of gearing used by the Diversified Program. The leverage or gearing may be measured in terms of the Diversified Program’s margin-to-equity ratio. This ratio is calculated by dividing the amount of margin posted with the futures commission merchant by the value of the portfolio. The Diversified Program’s long-term annualized volatility target is currently approximately 10% (please note that if applied to a managed account, a fully-funded managed account is assumed). However, it should be noted that the Diversified Program’s instantaneous forecast standard deviation (defined as the instantaneous risk Winton expects within the 24 hours following that particular instant) may vary outside these limits. In order to target a given level of long-term risk the instantaneous risk is allowed to fluctuate within a range around the long term risk target. In order to achieve the long-term risk target the correlation between different markets is estimated by the Diversified Program, and is employed in the calculation of the overall level of gearing which is reset on a daily basis.

The level of gearing typically used by the Diversified Program is normally determined by targeting a long-term daily standard deviation of less than 1 percent of the value of the portfolio as a whole. The long-term standard deviation refers to the long-term average risk that Winton expects over a number of months. However, it should be noted that the Diversified Program’s instantaneous forecast standard deviation (defined as the instantaneous risk Winton expects within the next 24 hours) will vary outside these limits. In order to maintain a given level of long-term risk, the instantaneous risk is allowed to fluctuate within a range around the long-term risk target.

Additionally, from time to time, the long-term standard deviation (defined as the long term average risk that Winton expects over a number of months) may also be above or below these limits, thereby having an impact upon the level of gearing used by the Diversified Program. For example, in the event that exceptional market conditions arise, such as the threat of closure of an exchange or other loss of liquidity, it may be determined to operate the Diversified Program at a lower level of gearing.

Program Description: Monitoring Slippage

Slippage refers to the difference between the market price at the time an order is placed to purchase or sell a contract and the actual price paid to make the purchase or sale. One of the main causes of slippage is attempting to fill an order that is too large to be absorbed easily by the market. Winton Capital Management monitors slippage primarily to make prompt adjustment in position size and thereby avoid having to give up potential profits.

Program Description: Use of Stress Testing

Winton Capital Management conducts frequent stress testing of its models utilizing proprietary simulation software which attempts to measure risk from several perspectives.

The trading methods applied by Winton Capital Management in its Diversified Program are proprietary, complex and confidential. As a result, the explanation above is of necessity general in nature and not intended to be exhaustive. Winton Capital Management plans to continue the research and development of its trading methodology and, therefore, retains the right to revise any methods or strategy, including the technical trading factors used, the financial instruments traded and/or the money management principles applied. Such ongoing revisions, unless deemed material, will not be made known to clients.

The trading strategy and account management principles described here are factors upon which Winton may base its trading decisions. Accordingly, no assurance is given that all of these factors will be considered with respect to every trade or recommendation made on behalf of the Diversified Program or that consideration of any of these factors in a particular situation will lessen a client's risk of loss or increase the potential for profits.

Program Description: Execution of Orders and Order Allocation

Winton Capital Management will select the type of order to be used in executing client trades and may use any type of order permitted by the exchange on which the order is placed or accepted by a counterparty where the order is executed over the counter. Winton Capital Management may place individual orders for each account or a block order for all accounts in which the same financial instrument is being cleared through the same Futures Commission Merchant ("FCM") or broker-dealer. When using a block order, Winton Capital Management will allocate trades to accounts using a proprietary algorithm. The aim of this algorithm is to achieve an average price for transactions as close as mathematically possible to the mean for each account. This takes the form of an optimization process where the objective is to minimize the variation in the average allocated price for each account. On occasion, it may direct the FCM or broker-dealer for the accounts to apply its own neutral order allocation system to assign trades. Partial fills are allocated in proportion to account size.

Management Information: David Winton Harding

Winton Capital Management was founded by David Winton Harding, Martin Hunt and Osman Murgian and started trading in October 1997. David Winton Harding is one of the pioneers of trend-following systematic trading in Europe. Whilst at Winton Capital Management, David Winton Harding has been registered with the CFTC as an Associated Person and listed as a Principal of Winton Capital Management and has been an Associate Member of NFA since January 1998.

David Winton Harding was born in Oxford in 1961 and graduated from Cambridge University with a First Class Honors degree in Natural Sciences specializing in Theoretical Physics. In September 1982, he joined stockbroker Wood

THE RISK OF LOSS IN TRADING FUTURES, OPTIONS AND OFF-EXCHANGE FOREX CAN BE SUBSTANTIAL.
PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

MacKenzie as a graduate trainee and became involved with futures trading just as the London International Financial Futures Exchange opened. A year later, in September 1983, he left Wood MacKenzie and moved to Johnson Matthey & Wallace, a commodity futures broker, where he was involved in gilt trading and sales. When that company closed due to the failure of its parent company, in November 1984 David Winton Harding left it and joined Sabre Fund Management, one of the UK's first Commodity Trading Advisors where he was an Associate Member of NFA from April 1986 until July 1988 and registered as an Associated Person from May 1986 until July 1988. In his new position, for the first time, David Winton Harding was able to apply his scientific training to develop techniques for trading a wide variety of futures markets.

In November 1986, David Winton Harding left Sabre Fund Management to join Brockham Securities, the Adam Family sugar trading company, where he assisted in development and marketing of futures fund management services. In February 1987 he left to form Adam, Harding and Lueck Ltd ("AHL"). AHL brought together the programming and system development abilities of Michael Adam and Martin Lueck with Mr. Harding's research and marketing skills. AHL rapidly became a successful Commodity Trading Advisor and in 1989, The Man Group PLC (formerly ED&F Man PLC) acquired a 51% stake and began distributing AHL's products globally. Over the next five years, the three principals built a firm with assets under management of \$300 million and a staff of nearly 100, including research teams developing mathematical and statistical trading strategies. AHL is still the flagship fund of the The Man Group which is a FTSE 100 Company. Mr. Harding was an Associate Member of NFA and an AP of Man AHL USA Corp from July 1988 until January 1996. He was also listed as a Principal of Man AHL USA Corp from July 1988 until February 1995.

In 1993, David Winton Harding was invited to present a paper to a special symposium of London's prestigious Royal Society, on the subject "Making Money from Mathematical Models." This paper was subsequently incorporated into two books.

In 1994, ED&F Man Group floated on the London Stock Exchange and acquired the remaining 49% of AHL. David Winton Harding then formed and ran Man Quantitative Research, an in-house advanced statistical research team until August 1996.

In August 1996 David Winton Harding left ED&F Man Group and took leave until February 1997. In February 1997, he co-founded Winton Capital Management with Martin Hunt and Osman Murgian, one of AHL's early shareholders. David Winton Harding continues to lead Winton Capital Management's research efforts.

David Winton Harding is also a trustee of the Winton Charitable Foundation, which in 2007 endowed the Winton Professorship of the Public Understanding of Risk in the Department of Pure Mathematics and Mathematical Statistics at Cambridge University. Similarly, in 2008, the David Harding Foundation endowed the David Harding Centre for Risk Literacy at the Max Planck Institute in Berlin, Germany.

THE RISK OF LOSS IN TRADING FUTURES, OPTIONS AND OFF-EXCHANGE FOREX CAN BE SUBSTANTIAL.
PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

ALTAVRA Inc. | 390 SE Mizner Boulevard #1809 Boca Raton, FL 33432 | 1-800-998-7870 | ALTAVRA.com

The descriptions above are from the manager's disclosure document.

THE RISK OF LOSS IN TRADING FUTURES, OPTIONS AND OFF-EXCHANGE FOREX CAN BE SUBSTANTIAL. PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS. PLEASE READ THE CTA'S RISK DISCLOSURE DOCUMENT CAREFULLY BEFORE INVESTING MONEY.

THE RISK OF LOSS IN TRADING FUTURES, OPTIONS AND OFF-EXCHANGE FOREX CAN BE SUBSTANTIAL.
PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

ALTAVRA Inc. | 390 SE Mizner Boulevard #1809 Boca Raton, FL 33432 | 1-800-998-7870 | ALTAVRA.com