

# ENRICHED INVESTING INCORPORATED

## *PROCEDURES DESIGNED TO ENSURE FAIRNESS IN THE ALLOCATION OF INVESTMENT OPPORTUNITIES*

June 20, 2008

Enriched Investing Incorporated (“Enriched”) is required by law to maintain standards directed to ensuring fairness in the allocation of investment opportunities among its clients and to furnish a copy of its established policies to each client and to file it with the appropriate regulatory authority.

When orders for more than one account are entered as a combined order, and transactions are executed at varying prices, Enriched will endeavour to treat all clients on a basis that is fair and reasonable in the context of the nature of the particular transaction and the transaction costs. This may include calculating a weighted average execution price and commission to be attributed to all accounts having orders included in the combined order. For greater certainty, when trades are bunched or blocked, the policy of Enriched is to allocate the commissions amongst clients on a pro rata basis.

The principal determination used by Enriched in allocating investment opportunities amongst its clients (including investment funds sponsored and managed by Enriched) is the suitability of purchase and sale transactions as determined by the unique circumstances and needs of each client as set out in the Statement of Objectives and Investment Policy or other document containing the investment objectives and policy established for the client’s account, as revised from time to time. Enriched’s policy is that no single account or type of account will receive preference in the allocation of investment opportunities.

When orders for more than one account are entered as a combined order and less than the total order is executed as a block, Enriched will generally attempt to make pro-rata allocations on the basis of order size. Enriched will also take into consideration the proportion of the portfolio (or portfolio section) that the security represents, the weight of the industry or security type in the portfolio (or portfolio section) and the cash reserve position in the portfolio (or portfolio section).

When orders for more than one account are entered as a combined order and the transactions are all executed at the same price, each client account will be given the same execution price.

Subject to market conditions and stock exchange procedures, Enriched will use its best efforts to ensure that orders are processed and executed on a first-in, first-out basis.

When orders for an initial public offering are entered for more than one account and are completely or partially filled, Enriched will attempt to the best of its ability to allocate the filled orders on a pro rata basis according to the proportion of the total of all orders submitted by Enriched for that initial public offering and Enriched will attempt to the best of its ability to calculate a weighted average execution price and commission to be attributed to all accounts included in orders for that initial public offering.

Enriched will endeavour to ensure that orders and modifications or cancellations of orders are recorded and are time-stamped.

The foregoing procedures will be revised from time to time in keeping with changes in regulatory requirements and industry practices. In the event of any such revision, Enriched will, as required, furnish a copy of the revised policies to each client and file it with the appropriate regulatory authority.