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### Alpha Program trading procedures

Revolution Capital Management ("RCM") utilizes Financial Consortium International ("FCI"), a CFTC-registered Introducing Broker ("IB"), to assist with its trading processes for its Alpha program. Jim Curley is a principal of FCI and is also an Associated Person of RCM (as required by the NFA in order to allow him to perform his ongoing marketing duties). To assure that no conflicts of interest arise due to the multiple affiliations of Mr. Curley, RCM has implemented the following mandates:

- For the majority of its trades, RCM uses direct execution methods via FIX protocols to executing brokers. FCI has no participation or influence in this process.
- For the remainder of the trades, FCI has been given strict instructions for timing of trades and generally places these trades into algorithmic execution engines chosen by RCM. In addition, the parameters for these execution engines are dictated by RCM.
- Multiple executing brokers are used by RCM. Multiple brokers are needed in case of operational problems at any one broker.
- RCM chooses the executing brokers based on their ability to provide the lowest cost and highest-quality customer service. Based on historical analyses of fill quality, RCM may at times direct FCI to preferentially use one broker vs. another.
- Allocation of trades is directed solely by RCM. Once the trades are completed, RCM passes the trades through an allocation algorithm that partitions fills in order to minimize any account's deviation from the average fill price for a given trade. The trade allocations are sent directly to the executing brokers so that the trades can be placed into the proper customer clearing accounts. FCI assists, when necessary, in facilitating the transfer of this information.
- RCM periodically compares "give-up" fees to ensure that FCI, in conjunction with the executing brokers, offers competitive rates relative to other IBs/FCMs.
- RCM receives no portion of any transaction fees paid, including but not limited to those for execution or clearing.

In summary, RCM has control over execution timing, execution style, choice of executing broker(s), and allocation of executed trades. RCM also ensures that "give-up" fees are competitively priced. FCI's main roles are to facilitate the mechanics of the trade execution and to assist with the accurate and timely flow of trades into the various clearing accounts. Finally, RCM receives no compensation (either directly or indirectly) for any of the trades it places on behalf of its customers.