

CLIENT DISCLOSURE STATEMENT

Crystal Wealth Management System Limited

Crystal Wealth Management System Limited (“Crystal Wealth”) is registered as a portfolio manager, commodity trading manager, investment fund manager and exempt market dealer in Ontario, Alberta and British Columbia.

This Client Disclosure Statement sets out important information concerning your relationship with Crystal Wealth. It also describes conflicts of interest that arise or may arise between Crystal Wealth or individuals acting on behalf of Crystal Wealth, and Crystal Wealth's clients, where a reasonable investor would be expected to be informed of the conflict or that Crystal Wealth believes is necessary to disclose to its clients to ensure that they are adequately informed of matters that may affect the services Crystal Wealth provides to them.

General

As an overall policy, Crystal Wealth monitors its business for any actual or potential conflicts of interest and assesses them as objectively as possible. Crystal Wealth believes that it has taken appropriate steps to manage such conflicts.

In carrying on business as a portfolio manager or exempt market dealer, Crystal Wealth may:

- (a) after providing a client with this Client Disclosure Statement and obtaining the written consent of the client, exercise discretionary authority in respect of securities of related issuers or connected issuers to Crystal Wealth; and
- (b) after providing a client with this Client Disclosure Statement, make recommendations in respect of securities of related or connected issuers to Crystal Wealth; and
- (c) sell securities issued by pooled funds, or other similar collective investment vehicles, established, managed and distributed by Crystal Wealth or an affiliate to clients..

In addition, Crystal Wealth or other related parties may act as principal or agent in respect of securities purchased or sold by or to clients of Crystal Wealth.

Important Concepts

“Related issuer” — An issuer is related to us if, through the ownership of or direction or control over voting securities, we exercise a controlling influence over that issuer or that issuer exercises a controlling influence over us.

“Connected issuer” — An issuer is connected to us if, due to indebtedness or certain other relationships, a prospective purchaser of securities of the connected issuer might question our independence from that issuer.

Crystal Wealth's Related and Connected Issuer Policy

It is the policy of Crystal Wealth that, subject always to compliance with the provisions from time to time of applicable securities and corporate legislation, regulations and policies and to the terms of its registration, Crystal Wealth may engage in certain activities in respect of securities of its related issuers and, in the course of a distribution, in respect of securities of connected issuers.

As a registered portfolio manager and investment fund manager, Crystal Wealth provides investment management services to many of its clients. In this capacity, Crystal Wealth or its directors, officers, or other employees may, from time to time, advise or provide recommendations to its clients in respect of mutual funds that are connected issuers to Crystal Wealth. In addition, in its capacity as an exempt market dealer, Crystal Wealth may, from time to time, act as a dealer behalf of its clients in connection with purchases or sales of securities of these mutual funds.

Related and Connected Issuers

As of September 2, 2011 there were no related issuers to Crystal Wealth that are reporting issuers or that have distributed securities outside of Ontario on a basis that, if they had done so in Ontario, would have made them reporting issuers.

The following mutual funds are connected issuers to Crystal Wealth by reason of the fact that Crystal Wealth acts as advisor to these funds:

- IFM Monitored World Equity
- Crystal Enhanced Mortgage Fund
- Crystal Enlightened Resource and Precious Metals Fund
- Crystal Enlightened Income Fund
- Crystal Enlightened Growth Fund
- Crystal Wealth Strategic Yield Media Fund

If you require further information concerning the relationship between Crystal Wealth and these related or connected issuers, please contact us.

Copies of, or revisions or amendments to, this statement of policy will be provided to each client in accordance with applicable law.

September 2, 2011