M.S. CAPITAL MANAGEMENT LTD

DISCLOSURE DOCUMENT

January 11, 2019

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PURSUANT TO AN EXEMPTION FROM THE COMMODITY FUTURES TRADING COMMISSION IN CONNECTION WITH ACCOUNTS OF QUALIFIED ELIGIBLE PERSONS, THIS BROCHURE OR ACCOUNT DOCUMENT IS NOT REQUIRED TO BE, AND HAS NOT BEEN, FILED WITH THE COMMISSION. THE COMMODITY FUTURES TRADING COMMISSION DOES NOT PASS UPON THE MERITS OF PARTICIPATING IN A TRADING PROGRAM OR UPON THE ADEQUACY OR ACCURACY OF COMMODITY TRADING ADVISOR DISCLOSURE. CONSEQUENTLY, THE COMMODITY FUTURES TRADING COMMISSION HAS NOT REVIEWED OR APPROVED THIS TRADING PROGRAM OR THIS BROCHURE OR ACCOUNT DOCUMENT.

RISK DISCLOSURE STATEMENT

THE RISK OF LOSS IN TRADING COMMODITY INTERESTS CAN BE SUBSTANTIAL. YOU SHOULD THEREFORE CAREFULLY CONSIDER WHETHER SUCH TRADING IS SUITABLE FOR YOU IN LIGHT OF YOUR FINANCIAL CONDITION. IN CONSIDERING WHETHER TO TRADE OR TO AUTHORIZE SOMEONE ELSE TO TRADE FOR YOU, YOU SHOULD BE AWARE OF THE FOLLOWING:

IF YOU PURCHASE A COMMODITY OPTION YOU MAY SUSTAIN A TOTAL LOSS OF THE PREMIUM AND OF ALL TRANSACTION COSTS.

IF YOU PURCHASE OR SELL A COMMODITY FUTURES CONTRACT OR SELL A COMMODITY OPTION OR ENGAGE IN OFF-EXCHANGE FOREIGN CURRENCY TRADING YOU MAY SUSTAIN A TOTAL LOSS OF THE INITIAL MARGIN FUNDS OR SECURITY DEPOSIT AND ANY ADDITIONAL FUNDS THAT YOU DEPOSIT WITH YOUR BROKER TO ESTABLISH OR MAINTAIN YOUR POSITION. IF THE MARKET MOVES AGAINST YOUR POSITION, YOU MAY BE CALLED UPON BY YOUR BROKER TO DEPOSIT A SUBSTANTIAL AMOUNT OF ADDITIONAL MARGIN FUNDS, ON SHORT NOTICE, IN ORDER TO MAINTAIN YOUR POSITION. IF YOU DO NOT PROVIDE THE REQUESTED FUNDS WITHIN THE PRESCRIBED TIME, YOUR POSITION MAY BE LIQUIDATED AT A LOSS, AND YOU WILL BE LIABLE FOR ANY RESULTING DEFICIT IN YOUR ACCOUNT.

UNDER CERTAIN MARKET CONDITIONS, YOU MAY FIND IT DIFFICULT OR IMPOSSIBLE TO LIQUIDATE A POSITION. THIS CAN OCCUR, FOR EXAMPLE, WHEN THE MARKET MAKES A ``LIMIT MOVE.''

THE PLACEMENT OF CONTINGENT ORDERS BY YOU OR YOUR TRADING ADVISOR, SUCH AS A ``STOP-LOSS'' OR ``STOP-LIMIT'' ORDER, WILL NOT NECESSARILY LIMIT YOUR LOSSESTO THE INTENDED AMOUNTS, SINCE MARKET CONDITIONS MAY MAKE IT IMPOSSIBLE TO EXECUTE SUCH ORDERS.

A ``SPREAD'' POSITION MAY NOT BE LESS RISKY THAN A SIMPLE ``LONG'' OR ``SHORT'' POSITION.

THE HIGH DEGREE OF LEVERAGE THAT IS OFTEN OBTAINABLE IN COMMODITY INTEREST 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. THIS DISCLOSURE DOCUMENT CONTAINS, AT PAGE 6, A COMPLETE DESCRIPTION OF EACH FEE TO BE CHARGED TO YOUR ACCOUNT BY THE COMMODITY TRADING ADVISOR.

THIS BRIEF STATEMENT CANNOT DISCLOSE ALL THE RISKS AND OTHER SIGNIFICANT ASPECTS OF THE COMMODITY INTEREST MARKETS. YOU SHOULD THEREFORE CAREFULLY STUDY THIS DISCLOSURE DOCUMENT AND COMMODITY INTEREST TRADING BEFORE YOU TRADE, INCLUDING THE DESCRIPTION OF THE PRINCIPAL RISK FACTORS OF THIS INVESTMENT, AT PAGE 2.

YOU SHOULD ALSO BE AWARE THAT THIS COMMODITY TRADING ADVISOR MAY ENGAGE IN TRADING FOREIGN FUTURES OR OPTIONS CONTRACTS. TRANSACTIONS ON MARKETS LOCATED OUTSIDE THE UNITED STATES, INCLUDING MARKETS FORMALLY LINKED TO A UNITED STATES MARKET MAY BE SUBJECT TO REGULATIONS WHICH OFFER DIFFERENT OR DIMINISHED PROTECTION. FURTHER, UNITED STATES REGULATORY AUTHORITIES MAY BE UNABLE TO COMPEL THE ENFORCEMENT OF THE RULES OF REGULATORY AUTHORITIES OR MARKETS IN NON-UNITED STATES JURISDICTIONS WHERE YOUR TRANSACTIONS MAY BE EFFECTED. BEFORE YOU TRADE YOU SHOULD INQUIRE ABOUT ANY RULES RELEVANT TO YOUR PARTICULAR CONTEMPLATED TRANSACTIONS AND ASK THE FIRM WITH WHICH YOU INTEND TO TRADE FOR DETAILS ABOUT THE TYPES OF REDRESS AVAILABLE IN BOTH YOUR LOCAL AND OTHER RELEVANT JURISDICTIONS.

THIS COMMODITY TRADING ADVISOR IS PROHIBITED BY LAW FROM ACCEPTING FUNDS IN THE TRADING ADVISOR'S NAME FROM A CLIENT FOR TRADING COMMODITY INTERESTS. YOU MUST PLACE ALL FUNDS FOR TRADING IN THIS TRADING PROGRAM DIRECTLY WITH A FUTURES COMMISSION MERCHANT OR RETAIL FOREIGN EXCHANGE DEALER, AS APPLICABLE.

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M.S. Capital Management Limited
Disclosure Document
January 11, 2019
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Introduction

The date of this Disclosure Document is January 11, 2019. The Disclosure Document shall not be used or relied upon by any investor opening an account with M.S. Capital Management Limited more than one year past the date stated above.

Futures contract trading is speculative in nature, involves a high degree of risk, and is not suitable for all investors. Prospective investors should consult their financial advisors before opening a managed futures account.

The Trading Advisor

M.S. Capital Management Limited ("MS") is a New Zealand company incorporated in August 1995. MS is registered with the Commodity Futures Trading Commission ("CFTC") as a commodity trading advisor, effective 19 January 2005, and is a member of the National Futures Association ("NFA") in the same capacity, effective 28 February 2005.

For the period February 1996 to January 2005, MS solicited, and managed funds for, New Zealand citizens only. As such, it was not required to register with the CFTC during this time.

M.S. is registered on the New Zealand Financial Services Provider Register (FSPR).

M.S. Capital Management Limited's registered office is located at:

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Email mark@mscapmgmt.com

Postal address:
PO Box 56400
Dominion Road
Auckland
New Zealand 1446

Details of past performance of the advisor can be found at the above location.

If required for inspection by the CFTC, the U.S. Department of Justice, or the NFA, MS' books and records will be made available in the United States of America at the offices of the National Futures Association, 300 South Riverside Plaza, #1800, Chicago, Illinois 60606.

M.S. Capital Management Limited operates as a "CTA" (Commodity Trading Advisor). Its primary activity is to buy, sell (including short sales) or otherwise trade in a diversified portfolio of futures contracts on exchanges world-wide. Past performance information can be found in the "Performance Table" section on pages 10 through 13 of this document.

There have never been any administrative, civil or criminal actions against M.S. Capital Management Limited or its principal, Mark Sleeman.

Principal

Mark Sleeman, born in 1962, is the sole director, employee and shareholder of M.S. Capital Management Limited. He incorporated the company in August 1995 and has served as **Managing Director** since then. From December 1986 to September 1997 Mr Sleeman operated his own residential construction contracting business, as a sole proprietor, while developing futures trading systems on a part time basis. Mr Sleeman ceased all construction activities in September 1997 to become a full-time employee of MS. Mr

Sleeman is a graduate of Auckland University in New Zealand, where he earned a Bachelor of Mechanical Engineering (Hons) in 1985. Mr Sleeman is registered as an associated person ("AP") of M.S. Capital Management Limited, effective 28 February 2005. He is listed as a principal of the firm, effective 14 January 2005.

Conflicts of Interest

M.S. Capital Management Limited may act as CTA to multiple clients and may manage proprietary accounts for itself and the principal. Therefore orders for client accounts will be executed in competition with orders for other client accounts and proprietary accounts. MS may have an incentive to favour one client account over another and proprietary accounts over client accounts in general. There will be a conflict of interest when allocating execution prices across accounts from pooled orders with the same Futures Commission Merchant ("FCM"). It is possible that MS may unknowingly give preferential treatment to proprietary accounts.

The M.S. Capital Global Diversified Program determines position sizes for each account based upon account equity, account risk, market volatility and individual market risk parameters. MS may place "block orders" with respect to clients' and proprietary trades. A block order is a group of orders for more than one client entered as one order. Block trades will be allocated to accounts in a systematic, non-referential manner. If the block trade does not fill at one price, resulting in partial fills, allocations to client accounts will be made on an average pricing basis. Average pricing amounts to adding up all the buys, or sells at their particular price levels, multiplied by the number of contracts at each particular price level, and dividing by the total number of contracts to determine an average price for the whole block trade. This is standard industry practice and the FCM's back office will facilitate the process. If average pricing is unavailable, the high-low method will be used. This method applies the higher fill prices to the higher account numbered clients for both buys and sells, and the lower fill prices to the lower account numbered clients for both purchases and sales. In cases where a portion of the order is executed at more than one broker or in more than one trading session, each portion is allocated as if it were a whole trade. This procedure is followed to ensure there is no favoritism in allocation of prices and all accounts are treated equally.

A potential conflict may also occur when MS or its principal trades their proprietary accounts more aggressively, or takes positions in proprietary accounts which are opposite, or ahead of, the positions taken by any non-proprietary account.

Trading records for all proprietary trading and written policies pertaining to such are available for review by clients and investors, upon notice of 7 working days.

Because MS charges a performance incentive fee it may engage in trading that is more risky than described in the trading program, to potentially increase its income through greater profits in which it would share. MS has no intention of trading in any manner not consistent with the program described herein.

Principal Risk Factors

There are many risks involved in trading futures contracts, prospective clients should consider all the risk factors described in this section and elsewhere in this disclosure document.

Futures Trading is Speculative and Volatile

Futures contract prices are highly volatile. Price movements are influenced by, among other things: changing supply and demand relationships; weather; agricultural, trade, fiscal, monetary, and exchange control programs and policies of governments; United States and foreign political and economic events and policies; changes in national and international interest rates and rates of inflation; currency devaluations and revaluations; and emotions of the marketplace. None of these factors can be controlled by MS and no assurance can be given that MS' advice will result in profitable trades for a participating customer, or that a customer will not incur substantial losses.

Futures Trading is Highly Leveraged

The low margin deposits normally required in futures trading (typically 2% to 15% of the value of the contract purchased or sold) permit an extremely high degree of leverage. Accordingly, a relatively small price movement in a contract may result in immediate and substantial losses to the investor. For example, if at the time of purchase 10% of the price of a futures contract is deposited as margin, a 10% decrease in the price of the contract would, if the contract is then closed out, result in a total loss of the margin deposit before any deductions for brokerage commissions. A decrease of more that 10% would result in a loss of more than the total margin deposit. Thus, like other leveraged investments, any trade may result in losses in excess of the amount invested.

When the market value of a particular open position changes to a point where the margin on deposit in a participating customer's account does not satisfy the applicable maintenance margin requirement imposed by the FCM, the customer, and not MS, will receive a margin call from the FCM. If the customer does not satisfy the margin call within a reasonable time (which may be as brief as a few hours) the FCM will close out the customer's position.

MS may hold many positions in an account, with a combined face value of several times the account equity. As a result even small price movements can produce large losses.

Futures Trading Can be Illiquid

Most United States commodity exchanges limit price fluctuations in certain commodity interest prices during a single day by means of "daily price fluctuation limits" or "daily limits." The daily limit, which is set by most exchanges for all but a portion of the expiration month, imposes a floor and a ceiling on the prices at which a trade may be executed, as measured from the last trading day's close. While these limits were put in place to lessen margin exposure, they may have certain negative consequences for a customer's trading. For example, once the price of a particular contract has increased or decreased by an amount equal to the daily limit, thereby producing a "limit-up" or "limit-down" market, positions in the contract can neither be taken nor liquidated unless traders are willing to effect trades at or within the limit. Contract prices in various commodities have occasionally moved the daily limit for several consecutive days with little or no trading. Similar occurrences could prevent MS from promptly liquidating unfavorable positions and subject a participating customer to substantial losses that could exceed the margin initially committed to such trades.

Trading on Foreign Exchanges and Exchange Rate Fluctuations

MS will trade futures contracts on various exchanges worldwide. Some positions may be at greater risk because the regulatory framework within foreign exchanges work may be less stringent than that used in the United States, notably in areas such as member's minimum financial requirements, margin requirements, segregation of customer funds, trading rules, and compliance monitoring.

Some foreign commodity exchanges are "principals markets" in which performance with respect to a contract is the responsibility only of the individual member with whom the trader has entered into a contract and not of the exchange or clearing house, if any. In such case MS' clients would be subject to the risk of the inability of, or refusal by, such member or the counterparty to perform with respect to such transactions.

Client's funds will be converted to the relevant currency to meet margin requirements for foreign contracts. This will expose the client to exchange rate fluctuations with respect to the base currency of the account. It is MS' policy to actively hedge foreign currency exposures that are large enough to have a significant effect on account performance. MS makes no guarantees that its hedging policy will increase account performance.

Failure of Futures Brokers

The client will deposit funds with a Futures Broker. The Brokers are required by regulation to segregate customer and client funds. However, if a Broker fails to do so the client's funds on deposit may be at risk in the event of the broker's insolvency. In addition in the case of another customer or the Broker not being able to cover the loss on such customer's account the client's funds may be at risk even if properly segregated. In the event of such insolvency or customer loss the client may lose all assets held with the broker, or only be entitled to a pro rata share of all property available for distribution to the broker's customers.

MS seeks to minimize these risks by accepting only established Brokers that it believes to be creditworthy.

The Effect of Fees and Expenses

Each of MS' clients will be subject to brokerage commissions, transactions costs, management fees and performance fees even if the account is not ultimately profitable. The sum of these may be substantial. As a result sizable trading profits may be necessary to realize a net profit in an account.

Commencement of Trading

Each new account, which MS is managing, encounters a start-up period, during which it incurs certain risks relating to the initial investment of assets. An account may commence trading at an unpropitious time, such as during a period of high risk in the MS portfolio. MS, in its discretion, may choose to manage the entry of the account's positions in an attempt to reduce the risk the new account faces. MS gives no assurance that the manner in which it commences trading of an account will be successful or will not result in substantial losses, which might have been avoided by other means of initiating such trading.

Margin Calls

MS is not responsible for margin requirements or any other costs charged by the Futures Commission Merchant. The responsibility for payment of these costs is the client's. Failure to promptly meet calls for margins or pay such costs may result in liquidation of a client's position in a market or of the whole account. The FCM may have the right to close out positions within a short period if margin calls are not met promptly by the client.

Trading is Based Only on Technical Market Data

The trading models used by MS are trend following and utilize only technical market data. The profitability of these models is dependent primarily upon sustained price moves (trends), either up or down, in futures prices. At times markets may go through periods where significant trends do not develop. There have been such periods in the past and they will likely occur again in the future. During these periods the profitability of the trading models is severely diminished. MS can make no guarantee that the performance of any client's account will be similar to that achieved by MS in the past.

Systems Failure

MS' strategies are highly dependent on the proper functioning of its internal computer systems. Accordingly, systems failure, whether due to third party failures upon which such systems are dependent or the failure of MS' hardware or software, could disrupt trading or make trading impossible until such failure is remedied. Any such failure, and consequential inability to trade (even for a short time), could, in certain market conditions, cause an account to experience significant trading losses or to miss opportunities for profitable trading.

Disruptions or Inability to Trade Due to a Failure to Receive Timely and Accurate Market Data from Third Party Vendors.

MS' strategies depend to a significant degree on the receipt of timely and accurate market data from third party vendors. Any failure to receive such data in a timely manner or the receipt of inaccurate data for any reason could disrupt and adversely affect MS' trading until such failure or inaccuracy is corrected.

Dependence on Mark Sleeman

MS is dependent on the services of Mark Sleeman. If the services of Mark Sleeman become unavailable, MS will cease its trading activities.

Trading Methods and Strategies

MS is currently offering its Global Diversified Program. It began trading proprietary funds in September 1997 and client funds in November 1998. The minimum account size for the program is generally USD 2,000,000.

MS began trading client accounts before being registered as a CTA with the CFTC in January 2005. All accounts traded prior to January 2005 were non-US client accounts. MS has been regulated by its home domicile authority (the New Zealand Securities Commission) since 1996.

Trading Philosophy

MS has observed that futures markets experience periods of non random price action (trends) from time to time. The successful capture of these trends provides the opportunity for profits. MS believes that market trends are a function of the following factors:

i. The group psychology of market participants.
ii. A significant hedging presence.
iii. The zero sum nature of futures markets.

These factors can be expected to be present in the future. It is therefore assumed that trends will continue to occur. This provides the basis for the creation of a "Robust" trading strategy i.e. one that has a reasonable chance of performing in the future. MS also believes that these trends are not necessarily predictable, this means that any strategy which attempts to utilize them requires strict risk control and will be subject to volatility.

Trading Methodology

MS' trading strategy attempts to capture significant price changes in futures markets. Medium to long term proprietary technical trading models are used to generate trade signals. These models analyse market data and utilize trend following and pattern recognition algorithms. The models are diversified across time frames and are applied across all markets traded. As a result a market can be traded by several models concurrently. The trades signalled by each model are followed independently of the other models. MS can make no assurance that the models currently being used will produce results similar to those produced in the past.

The trading models are applied to a broad range of worldwide futures markets. Markets are selected based on the amount of diversification offered, execution cost, and regulatory environment. Page 9 of this document includes a list of contracts traded.

MS will continue to develop new trading models and may modify models currently in use. It may or may not use these models to trade client accounts. MS reserves the right to discontinue using any model that, for any reason, it believes is no longer valid.

MS applies risk management strategies to control risk on 4 levels: individual position risk, market risk, group risk, and portfolio risk. Each position is sized to attempt to keep risk within preset levels. Within any one market the sum of the individual position risks is monitored and controlled. The risk across any group of similar markets is monitored as is the total risk across the entire portfolio.

MS estimates that, based on prior experience, the aggregate margin required for all positions in a client's account will generally range between 5% and 30% of the account's net assets. Occasionally the margin requirements may be outside this range.

Brokerage Arrangements

Investors must open and maintain a discretionary trading account with a futures commission merchant ("FCM") of their choice, the trading of which will be directed by M.S. Capital Management Limited. Additionally the client is free to choose which, if any, introducing broker (“IB”) will be used. MS reserves the right to reject an account opened with any FCM or IB, which it considers to be unacceptable because of excess commissions, inadequate execution capability or otherwise. MS will not receive any form of compensation or consideration, either direct or indirect, from any FCM or IB as a result of maintenance of client accounts with such FCM or IB.

MS anticipates that it may use a “give up” arrangement in which all trades are executed through one or more brokers of MS’ choice and then “given up” to the client’s FCM to be cleared. The additional fees that will be incurred as the result of “giving up” the trade will not generally exceed an average of $3.00 per round turn.

Each Account will be charged brokerage commissions on its market transactions at rates set by the FCM and/or IB. The commission rate structure of each account will be determined by agreement between the broker and each investor.

The FCM will provide each investor with daily confirmations and a monthly account summary statement showing all transactions and brokerage commissions paid during the past month. M.S. will provide reports dependent on the client's requirements.

Advisory Fees

Management Fee

Under the terms of the Management Agreements pursuant to which M.S. Capital Management Limited will direct trading of each commodity account, each investor will pay to MS management and performance fees, based on the nominal account value.

The monthly management fee, which is payable in advance as of the beginning of each client month, equals one twelfth of one percent (0.0833 of 1.0%) of the nominal account value at the beginning of each client month - a one percent (1.0%) annual rate. The nominal account value is the net asset value of the account plus notional equity, if any. For these purposes the nominal account value is not reduced by any performance fee that might be payable or accrued as of the client month-beginning of determination (or upon withdrawal of capital). Note: the nominal account value equals the net asset value when there is no notional equity.

For purposes of calculating the management fee net asset value will mean total assets in the account, including all cash and cash equivalents, committed funds and the market value of all open positions maintained in the account less all liabilities of the account. It will be calculated in accordance with generally accepted accounting principles.

The definition of notional equity is included on page 7 of this document.

Performance Fee

The yearly performance fee will equal 20% of the net new profits in the client account. Net new profits are defined as the increase (if any) in the client’s nominal account value, after adjustment for additions and withdrawals, as of the end of a client year over the greater of:

- i. The highest year level in such account as of the end of any previous year (after reduction for any performance fee payable as of the end of such previous year) or:
- ii. The equity invested in the account (if the account has not been profitable). If an account incurs a trading loss in any client year, such loss must be earned back before any performance fee would be payable as of a subsequent year-end.

When opening an account the client is free to choose the year-end month for that account. Thereafter, each “client year” for that account is the 12 month period which ends on the last day of the chosen month.

If amounts are withdrawn from the account, losses carried forward will be reduced in the same proportion as such withdrawals bear to the equity in that account. Pro rata performance fees are payable on the amount withdrawn as if the date of the withdrawal were the end of the year.

For the purposes of calculating the performance fee, profits are calculated only at the end of each client year and upon termination of or withdrawals from an account, not during interim periods. Consequently, an account may have incurred losses from its highest cumulative profit level and have a performance fee payable as of the end of a client year.

Interest income is not included in trading profits for the purposes of calculating the performance fee.

Management and performance fees paid to M.S. will be retained by it irrespective of whether an account subsequently experiences losses.

Notional Funding of an Account

The following is not a recommendation for clients to fund accounts with notional equity. It has been provided solely to help prospective clients fully understand the information presented in this disclosure document. Clients should consult their financial advisors as to whether the use of notional equity is suitable for them.

Notional funds are funds which have been committed by a client to the trading activity of the account but are not actually held in the account. Notional funding allows a client to trade the account at a level higher (the nominal account value) than the actual cash held in the account. The nominal account value equals the total net assets in the account plus any notional funds.

The client should be aware that monthly management fees and yearly performance fees are calculated based on the total nominal account value, which includes both notional funds and actual net assets. For example a 2% management fee is equivalent to 4% of actual net assets on an account that has 50% notional equity.

While the dollar value of fees and commissions remains the same in an account using Notional equity the cost of these items as a percentage of actual net assets increases. For example a 2% cost on nominal account size will be equivalent to a 4% cost on actual net assets in an account that has 50% notional equity.

The notional portion of an account will be only increased or decreased upon written instructions by the client. Increases in the nominal account value may occur by:

a. adding actual funds to the account
b. increasing the account's notional equity
c. positive net performance.

Decreases in the nominal account value may occur by:

a. withdrawing actual funds from the account
b. decreasing the account's notional equity
c. negative net performance.

Notional equity has the effect of creating additional leverage in the account (see the discussion of leverage in "Principal Risk Factors"). This additional leverage results in proportionally greater losses to the account balance over an account that contains no notional equity. For example, in an account that has 50% deposited with the Broker (and therefore 50% notional equity) a loss of 10% of the account's total value results in a loss of 20% of the cash in the account. Therefore the chance of losing all the cash in the account, while present in all accounts, is higher in an account that uses notional equity. An account that contains notional equity may receive more frequent and larger margin calls.

When inspecting past performance records contained in this document a client who intends to fund their account notionally should read the tables in conjunction with the Notional Funds Performance Computing Matrix on page 10. This allows a client to take the actual rate of return and determine what the adjusted rate of return would have been at various different funding levels.

Investing in an Account

A minimum initial investment of USD 2,000,000 is generally required to open a commodity account. MS regards this as the minimum amount needed for proper diversification. MS reserves the right to accept smaller amounts.

Additional funds may be added to a commodity account at any time. There is no minimum incremental investment size once the USD 2,000,000 minimum is reached. Withdrawals may be made at any time by the client. MS requests that the client provides it with written notice of each withdrawal. If the withdrawal involves liquidation of portfolio positions, the client acknowledges that illiquidity in the markets may affect the timing of the payment of such withdrawal. No withdrawal will be permitted that will reduce the equity (not including open trade equity) in a commodity account below the USD 2,000,000 minimum level, unless such withdrawal is part of the process of terminating the account.

M.S. Capital Management Limited reserves the right in its absolute discretion to terminate an account at any time as well as waive the foregoing restrictions on withdrawals.

Privacy Policy Notice to Clients

We collect non-public personal information about you from the following sources:

1. Information we receive from you on managed account agreements and related forms (for example, account numbers, account balances, assets, income, investment experience, social security number, name, address, and birth date); and

2. Information about your transactions with us (for example, account activity and balances).

We do not disclose any non-public personal information about our customers or former customers to anyone other than in connection with the administration, processing and servicing of customer accounts or to our accountants, attorneys, and auditors or as otherwise permitted or required by law.

We restrict access to non-public personal information about you to our personnel who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural controls to safeguard your non-public personal information.

List of Contracts Traded

The following table lists the contracts in the MS portfolio. MS reserves the right to trade some, but not all, of these and may add or delete contracts without notice to clients.

1. CURRENCIES

AUD/USD	GBP/USD	CAD/USD	EUR/USD	JPY/USD	MXN/USD
CHF/USD	EUR/GBP	NZD/USD	EUR/CHF	EUR/JPY	GBP/JPY

2. FINANCIALS

Canadian BAB	Euro Dollars	Euribor	Euro Swiss	Euro Yen	Short Sterling
Aust. Bills	NZ Bills				
Long Gilt	Euro Bund	US T-Notes	US T-Bonds	Aust. 10 y Bond	Aust. 3 y Bond
Canadian Bond	Jap Govt Bond				

3. FOOD-FIBER

Coffee (NY)	Coffee (Ldn)	Orange Juice	Sugar	White Sugar	Cocoa
Ldn Cocoa	Cotton	TCM Rubber	Class III Milk	Ran Lg Lumber	

4. ENERGY COMPLEX

Crude Oil	Brent Crude	Heating Oil	RBOB Gasoline	Gas Oil	Natural Gas
UK Natural Gas					

5. METALS

Aluminium	Copper	Lead	Nickel	Gold	Platinum
Palladium	Silver	Tin	Zinc		

6. GRAIN COMPLEX

Corn	Paris Corn	Crude Palm Oil	Soybeans	Soybean Meal	Soybean Oil
Chicago Wheat	Kansas Wheat	Paris Wheat	SA White Maize	Rapeseed Oil	Paris Rapesd Oil

7. MEATS

Live Cattle	Feeder Cattle	Lean Hogs

8. INDICES

Aust. All-Ords	CAC-40	FTSE-100	Mini S&P	Mini Nasdaq	DAX Index
Nikkei 225	Hang Seng Indx	S&P Canada 60	KL Comp Index	VIX	

Matrix for Computing Performance of Notional Accounts

Actual Rate of Return	Hypothetical Funding Levels			
	100%	75%	50%	25%
-25%	-25%	-33%	-50%	-100%
-10%	-10%	-13%	-20%	-40%
0%	0%	0%	0%	0%
10%	10%	13%	20%	40%
25%	25%	33%	50%	100%
50%	50%	67%	100%	200%
75%	75%	100%	150%	300%
	Adjusted Rates of Return at Various Funding Levels			

When inspecting the following performance table, clients who intend to use notional funding in their account should use this matrix to convert the actual rate of return to the adjusted rate of return that would have been experienced at various funding levels.

Performance Table 1

The following performance table is presented to provide clients with account performance information that is representative of M.S. Capital Management Limited's historical trading management record.

MS GLOBAL DIVERSIFIED PROGRAM
COMPOSITE
(UNAUDITED)

Commodity Trading Advisor (CTA): M.S. Capital Management Limited
Name of Trading Program: MS Global Diversified Program
Inception of trading by CTA: November 1998
Inception of Trading in Offered Program: November 1998
Total Nominal Assets Under Management by CTA - USD: 5.696 million
Total Nominal Assets Currently Traded in Offered Program - USD: 5.696 million
Number of Accounts Currently Traded in Offered Program: 1
Largest Monthly Percentage Draw-down: 10.16% February 2018
Worst Peak-to-Valley Draw-down: 35.62% February 2011 – August 2013
Number of Profitable Accounts Opened and Closed: 0
Range of Returns Experienced by Profitable Accounts: N/A
Number of Unprofitable Accounts Opened and Closed: 0
Range of Returns Experienced by Unprofitable Accounts: N/A

PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

	Monthly % ROR												Annual % ROR
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
2018	7.44	(10.16)	(0.79)	1.08	(1.88)	(2.49)	1.80	6.24	(2.42)	(8.61)	1.92	(0.21)	(9.17)%
2017	1.17	(1.30)	(4.18)	3.04	(1.56)	(0.98)	1.08	0.94	(5.49)	4.88	(1.28)	3.76	(0.44)%
2016	2.09	3.24	(4.61)	(2.47)	(5.06)	6.00	2.83	(4.97)	6.46	(6.45)	(0.30)	(4.05)	(8.13)%
2015	4.95	(0.32)	3.30	(4.40)	0.04	(1.14)	2.07	(1.52)	4.63	(8.16)	4.93	0.16	3.73%
2014	(1.07)	3.58	3.44	2.33	0.05	6.99	3.38	3.12	5.96	1.57	6.81	4.06	48.05%
2013	0.55	(1.69)	1.38	2.48	(1.26)	0.54	(2.16)	(2.87)	0.30	2.58	0.98	0.45	1.11%

Notes to Performance Table 1

1. "Monthly Percentage ROR" (rate of return) is calculated using the Compounded ROR method.

2. Annual and Year to Date Percentage Rates of Return are calculated using the Value Added Monthly Index (VAMI) method. The current month VAMI is calculated by multiplying the current month rate of return by the previous month VAMI and then adding the result to the previous month VAMI.

3. "Largest Monthly Percentage Draw-down" represents the largest loss in any calendar month expressed as a percentage of that month's beginning net asset value.

4. "Worst Peak-to-Valley Draw-down" means the greatest cumulative percentage decline in month-end net asset value due to losses sustained in any period in which the initial month-end net asset value is not equalled or exceeded by a subsequent month-end net asset value.

5. All accounts included in this table have had a notional funding level of at least 60% at all times. The interest on these notional funds is not included in the performance shown.

6. Accounts incurred management fees of 0% per annum, and performance fees of 20% of net new profits.

7. Individual investor returns may vary greatly due to differences in fee structure.

8. All accounts in this table have a base currency of US dollar. Accounts with different base currencies may have experienced materially different rates of return, due to exchange rate fluctuations.

9. Accounts incurred commission charges ranging between 5 USD and 11 USD per round turn.

Performance Table 2, Supplemental Performance

MS GLOBAL DIVERSIFIED PROGRAM – since inception.
COMPOSITE
(UNAUDITED)

Previous 5 years and year to date:
Largest Monthly Percentage Draw-down: 10.16% February 2018
Worst Peak-to-Valley Draw-down: 35.62% February 2011 – August 2013

Since inception:
Largest Monthly Percentage Draw-down: 14.01% October 2011
Worst Peak-to-Valley Draw-down: 35.62% February 2011 – August 2013

PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

	Monthly % ROR												Annual % ROR
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
2018	7.44	(10.16)	(0.79)	1.08	(1.88)	(2.49)	1.80	6.24	(2.42)	(8.61)	1.92	(0.21)	(9.17)%
2017	1.17	(1.30)	(4.18)	3.04	(1.56)	(0.98)	1.08	0.94	(5.49)	4.88	(1.28)	3.76	(0.44)%
2016	2.09	3.24	(4.61)	(2.47)	(5.06)	6.00	2.83	(4.97)	6.46	(6.45)	(0.30)	(4.05)	(8.13)%
2015	4.95	(0.32)	3.30	(4.40)	0.04	(1.14)	2.07	(1.52)	4.63	(8.16)	4.93	0.16	3.73%
2014	(1.07)	3.58	3.44	2.33	0.05	6.99	3.38	3.12	5.96	1.57	6.81	4.06	48.05%
2013	0.55	(1.69)	1.38	2.48	(1.26)	0.54	(2.16)	(2.87)	0.30	2.58	0.98	0.45	1.11%
2012	(0.53)	(1.24)	(3.62)	1.45	1.44	(8.94)	6.90	(5.07)	(1.88)	(4.94)	(1.16)	0.27	(16.76)%
2011	3.40	0.50	(3.18)	1.33	(12.90)	(10.08)	5.51	(4.37)	12.10	(14.01)	6.50	0.31	(17.04)%
2010	(3.90)	0.20	6.50	2.42	(12.69)	3.63	(2.70)	7.51	4.97	10.69	(5.58)	13.06	23.32%
2009	NT	NT	NT	NT	NT	(1.98)	1.61	3.66	2.11	(1.71)	6.21	(0.77)	9.23%
2008	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT
2007	(0.04)	(3.92)	(6.53)	2.43	1.69	7.23	(2.85)	(7.91)	3.73	3.69	NT	NT	(3.52)%
2006	3.93	(4.57)	13.84	9.51	4.30	(6.60)	(3.56)	1.05	(0.60)	1.60	(0.55)	0.07	17.97%
2005	(1.80)	(0.35)	(0.22)	(4.18)	1.75	2.30	(4.37)	(2.81)	(2.23)	0.49	5.21	1.79	(4.78)%
2004	1.46	12.24	0.72	(8.16)	(0.28)	(4.45)	3.55	(2.39)	3.75	0.08	4.69	(2.19)	7.87%
2003	8.56	4.11	(10.81)	(2.61)	12.11	(7.40)	(2.73)	(1.70)	(8.16)	10.43	(6.37)	1.94	(5.67)%
2002	(1.76)	(0.34)	(3.42)	(4.48)	6.06	(0.48)	(1.79)	9.00	7.76	(6.56)	0.82	4.82	8.60%
2001	2.30	5.34	10.43	(7.54)	1.27	1.67	6.23	(1.14)	8.72	4.88	(5.34)	(4.24)	22.97%
2000	3.50	17.70	(9.73)	4.45	5.97	(4.53)	(0.53)	3.74	(6.98)	(1.38)	0.85	5.37	16.90%
1999	(4.58)	(1.51)	1.30	5.09	(3.34)	(1.06)	(4.71)	0.82	(0.35)	(9.29)	2.17	(3.74)	(18.27)%
1998											0.50	4.01	4.53%

Notes to Performance Table 2

1. "Monthly Percentage ROR" (rate of return) is calculated using the Time Weighting Average method for the period November 1998 to October 2007. From November 2007 onwards the Compounded ROR method is used.

2. Annual and Year to Date Percentage Rates of Return are calculated using the Value Added Monthly Index (VAMI) method. The current month VAMI is calculated by multiplying the current month rate of return by the previous month VAMI and then adding the result to the previous month VAMI.

3. "Largest Monthly Percentage Draw-down" represents the largest loss in any calendar month expressed as a percentage of that month's beginning net asset value.

4. "Worst Peak-to-Valley Draw-down" means the greatest cumulative percentage decline in month-end net asset value due to losses sustained in any period in which the initial month-end net asset value is not equalled or exceeded by a subsequent month-end net asset value.

5. All accounts included in this table have had a notional funding level of at least 60% at all times. The interest on these notional funds is not included in the performance shown.

6. Accounts incurred management fees ranging between 0% and 2% per annum, and performance fees between 20% and 25% of net new profits.

7. Individual investor returns may vary greatly due to differences in fee structure.

8. For the period November 2007 to May 2009, MS has no client funds under management. The "NT" performance results in the table for this period stand for "No Trading".

9. For the period November 1998 to October 2007, all accounts included in this table have a base currency of New Zealand dollar. From June 2009 forward, all accounts have a base currency of US dollar. Accounts with different base currencies may have experienced materially different rates of return, due to exchange rate fluctuations.

10. Accounts incurred commission charges ranging between 5 USD and 50 USD per round turn.

11. MS began trading client accounts before being registered as a CTA with the CFTC in January 2005. All accounts traded prior to January 2005 were non-US client accounts. MS has been regulated by its home domicile authority (the New Zealand Securities Commission) since 1996.