Vortex Investment Advisors Ltd.

Kanto Local Finance Bureau (FIBO) No. 3015 Associations in which a Member: The Japan Investment Advisers Association

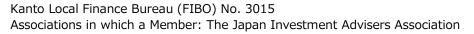


Vortex Investment Advisors Ltd. (hereinafter referred to as "our company"), based on the "Act on the Provision of Financial Services", establishes and complies with the solicitation policy in relation to sales of financial instruments as follows, conducts proper solicitation and sales, and strives to comply with compliance and to secure and improve the trust of customers.

Solicitation policy for financial instruments

- 1. Matters to be considered in light of the knowledge, experience and status of property of the person to be solicited and the purpose of concluding a contract for the sale of financial instruments
- (1) When recommending financial instruments, our company fully understands the customer's knowledge, experience, financial status and the purpose of concluding a contract for the sale of financial instruments, etc. and endeavors to conduct solicitation in accordance with the customer's intentions and circumstances.
- (2) When recommending financial instruments, our company endeavors to make proper explanation on the contents of the financial instruments to recommend and risks, etc. in light of the customer's knowledge, experience, financial status and the purpose of concluding a contract for the sale of financial instruments, etc.
- 2. Matters to be considered for the person subject to the solicitation with regard to the method and time of solicitation
- (1) Our company strives to ensure that customers understand important matters such as the contents of financial instruments and risks by delivering documents or other appropriate methods so that customers can conduct transactions at their own discretion and responsibility.
- (2) In soliciting customers, our company places the highest priority on ensuring the trust of customers, adheres to laws and regulations and various rules, and endeavors to solicit customers on a customer-oriented basis.
- (3) Our company endeavors not to conduct solicitation by telephone or visit during a time that may be a nuisance to the customer. Please let the person in charge know if solicitation causes a nuisance.

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- 3. Other matters related to ensuring the appropriateness of solicitation
- (1) Our company complies with the laws and regulations and various rules and strives to strengthen its internal control system so that solicitation of customers is made appropriately.
- (2) In order to ensure proper solicitation of customers, our company improves training system for officers and employees, and strives to acquire and improve knowledge and skills, including product knowledge.
- (3) Our company strives to provide appropriate and sufficient information so that transactions are conducted at the discretion and responsibility of customers.
- (4) If you have any complaints, requests, or other concerns, please contact below.

Customer service office (Tel: 0120-919-076) Corporation engaging in specified non-profit activities, Financial Instruments Mediation Assistance Center (FINMAC) Address: Daini Shoken Kaikan, 2-1-1, Kayabacho, Nihonbashi, Chuo-ku, Tokyo Tel: 0120-64-5005 Weekdays: 9:00 to 17:00 (excluding holidays including substitute holidays, December 31 to January 3)