

TLS Advisors LLC

Part 2A of Form ADV Firm Brochure

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This brochure provides information about the qualifications and business practices of TLS Advisors LLC. If you have any questions about the contents of this brochure, please contact us at 312-264-2000. The information in this brochure has not been approved or verified by the U. S. Securities and Exchange Commission or by any state securities authority. TLS Advisors LLC's registration as a registered investment adviser does not imply a certain level of skill or trading.

Additional information about TLS Advisors LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

None.

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Advisory Business

TLS Advisors LLC ("TLS"), is a Delaware limited liability company formed in 2016. Mark Feldberg is the majority Member of TLS, and TradeLink Holdings LLC is a Minority Member. The principal owners of TradeLink Holdings LLC are Walt K. Weissman and Steven W. Wolf, with Mark Feldberg a minority owner. TLS is an investment adviser registered with the U.S. Securities and Exchange Commission ("SEC"). TLS is a commodity trading adviser and commodity pool operator registered with the Commodity Futures Trading Commission ("CFTC").

TLS acts as investment adviser, sponsor, or General Partner to pooled investment vehicles ("TLS Funds or Clients"), including one proprietary vehicle. TLS Funds have broad investment mandates; there are no material limitations on the instruments that TLS trades on behalf of the TLS Funds.

TLS evaluates potential investments using both fundamental analyses and quantitative methods. Through a fundamental analysis, TLS seeks out companies or assets priced below their intrinsic value. TLS also uses a proprietary investment model which generates signals based on a quantitative analysis, which together with the results of TLS's fundamental analysis, is then used to determine which assets to buy, sell, or hold. TLS formulates investment objectives, directs, and manages the investment and reinvestment of the Clients' assets, and provides reports to investors in the Clients. Investment advice is provided directly to each Client according to that Client's particular investment objectives, and not, with respect to the TLS Funds, individually to any Fund investor. Fund investors may not impose restrictions on the TLS Funds' investment activities.

As of December 31, 2023, TLS had Regulatory Assets under Management of approximately \$239 Million, all managed on a discretionary basis.

The Funds

Inflation Defender Hedge Fund, L.P.

The Partnership's principal investment objective is to achieve capital appreciation in all stages of an inflationary environment.

Fees and Compensation

Inflation Defender Hedge Fund, L.P.

Inflation Defender will pay to TLS, or one or more of its designated affiliates, a management fee (the "Management Fee") with respect to each Limited Partner, calculated based on a percentage of each Limited Partner's Capital Account balance. The Management Fee equals an annual rate of 0.95%.

TLS, in its sole and absolute discretion, may waive or reduce the Management Fee with respect to certain Limited Partners, including, but not limited to, principals, partners, directors, officers and employees of TLS (and their family members) or their affiliates, without entitling any other Limited Partner to such waiver or reduction.

Performance-Based Fees and Side-By-Side Management

TLS does not charge a performance-based fee for the management of Inflation Defender.

Types of Clients

TLS provides discretionary investment advice to the TLS Funds. Partnership interests in Inflation Defender are offered only to (i) “Accredited Investors” within the meaning given to such term in Regulation D under the Securities Act and (ii) “Knowledgeable Employees” as defined in Section 3(c)(5) of the Investment Company Act.

Methods of Analysis, Investment Strategies and Risk of Loss

An investment in any TLS Fund is speculative, illiquid, involves a high degree of risk and is suitable only for persons who can assume the risk of losing their entire investment. Investing in any security or future product involves risk of loss that investors should be prepared to bear. As TLS Funds trade with a high degree of leverage, investors could lose all or substantially all their investment. Those who are not familiar with such risks should not consider investing in a TLS Fund. Please refer to the “Certain Risk Factors” section in the Offering Memorandum for more information.

Analysis and Strategy

Inflation Defender Hedge Fund, L.P.

Inflation Defender’s principal investment objective is to achieve capital appreciation in all stages of an inflationary environment.

In attempting to achieve the investment objective, TLS expects to invest in, hold, sell, sell short and trade across asset classes, including equities, commodities, currencies, and interest-rate instruments. Inflation Defender will potentially invest in common stock, preferred stock, derivatives, bonds, commodities, commodity futures, forwards, swaps, and currencies. Inflation Defender may also invest in cryptocurrencies, depending on guidance from the Securities and Exchange Commission (the “SEC”) and other applicable regulators. Inflation Defender will consider investments in different countries around the world. Inflation Defender will take long and short positions. Inflation Defender does not intend to invest in Treasury Inflation-Protected Securities (“TIPS”) except as part of a pair trade, because TLS believes that investors in Inflation Defender can gain exposure to TIPS if desired outside Inflation Defender with a lower cost profile. Finally, although TLS does not currently expect to invest in real estate (directly or through REITs), it may determine in the future that such investments are attractive in which case it may cause Inflation Defender to invest in real estate.

Inflation Defender’s risk or return will not be managed relative to any securities index or securities benchmark other than U.S. inflation. Rather, TLS will make allocation decisions based on its view of the path of inflation in the United States, the stage of progress along that path, and the historical and current attractiveness of a particular investment considering the current stage of the inflation cycle. Based on TLS’s research, TLS believes that certain asset classes perform differently at different stages of the inflation cycle. TLS expects that its research, coupled with the pricing of a given investment or asset class, will drive decisions

around the allocation of Inflation Defender's assets to different investments or asset classes. Notwithstanding the foregoing thesis, TLS intends to be mindful of the possibility that from time-to-time certain investments may already have discounted future inflation expectations, and, thus, while the investment may have historically benefited from inflationary conditions, such expectations may already be priced in. In that case, TLS may determine that certain investments or asset classes are less attractive resulting in smaller allocations of Inflation Defender's assets.

Inflation Defender has broad targets as to allocation to different asset classes, but, because Inflation Defender is opportunistic based on price, it may stray from those targets. Inflation Defender may focus its investments in a particular asset class, sector, region, or country, and in companies of any market capitalization, and those allocations may change over time. However, Inflation Defender generally will not invest more than twenty percent (20%) of the net asset value of its portfolio in any single asset (measured at the time of acquisition); provided that, any such asset could temporarily exceed twenty percent (20%) of the portfolio's net asset value due to market fluctuations.

TLS evaluates potential investments using both fundamental analyses and quantitative methods. Through a fundamental analysis, TLS seeks out companies or assets priced below their intrinsic value. TLS also uses a proprietary investment model which generates signals based on a quantitative analysis, which together with the results of TLS's fundamental analysis, is then used to determine which assets to buy, sell, or hold. Quantitative analysis involves research into historical performance and develops models based on that research. Because of its reliance on history, one of the key questions TLS will consider is whether there is something different or unique about the current environment which would render a model based on historical information inaccurate. TLS expects to have a strong bias against selecting investments based on a determination that "this time is different", but TLS may determine to trim allocations to investments or reevaluate the reliability of certain models based on a concern about historical information being an unreliable indicator.

Because TLS's fundamental and quantitative analyses are very sensitive to price, TLS's investment decisions are expected to be opportunistic in nature. As a result, TLS may cause Inflation Defender to sell well-performing investments when it believes that better opportunities are available elsewhere. Also, since TLS's view is that mispriced investments are inherently more volatile than properly priced investments, TLS expects that Inflation Defender's portfolio will be more volatile than a passively managed portfolio of similar instruments. As such, TLS expects that Inflation Defender's portfolio will turn over approximately fifty percent (50%) of its holdings each year.

Inflation Defender may invest in commodities through spot market purchases, futures contracts, or other derivatives instruments. In some cases, the contango roll structure of futures may make the projected return unappealing, even if the underlying commodity is attractive. In such cases, if TLS can identify equity securities of producers and other companies in the commodities business with attractive economics and value, Inflation Defender may take a position in such equity securities to get exposure to the applicable commodity. TLS's historical research has shown that investing in commodity producers

generally is not as beneficial as investing in a commodity directly unless the producer has significant leverage, which entails risk. However, in some cases, TLS may determine that the equity securities of a properly priced, properly capitalized commodity producer are the best alternative for getting exposure to the applicable commodity.

TLS has wide latitude to invest or trade the Fund's assets and is not required to obtain the approval of the investors to pursue any strategy or tactic or to change the Fund's emphasis or objectives. TLS may use margin borrowings and other leveraging techniques. The Fund is not limited in the types of securities or other investment instruments in which it may invest, the types of positions it may take, the concentration of its investments (by country, sector, industry, company, asset class or otherwise), the amount of leverage it may employ, or the extent to which it may take short positions.

Material Risks

An investment in a TLS Fund involves certain risks and potential conflicts of interest. The below risk summary does not attempt to describe all risks associated with the investment strategies pursued by the Funds. The Funds' offering memoranda contains a more complete descriptions of the risks associated with investments in such entities. Investing in securities and derivatives involves risk of loss that investors should be prepared to bear.

The below Risk Factors do not purport to be a complete description of the risks involved in investing in a TLS Fund. Potential investors should read this entire document and the Fund Offering Memorandum before deciding whether to invest. Furthermore, both this document and the Offering Memorandum provide only summary descriptions of the Fund, its strategies, the markets in which it trades and its leverage and risks and rely on the financial sophistication of all prospective investors. No one who, either individually or together with his/her financial advisers, does not have sufficient expertise to evaluate the risks of highly leveraged, speculative equities and derivatives trading should consider investing in a TLS Fund.

Business Risks

General Risks of Investing

Investments in a TLS Fund are subject to all risks associated to any investment in publicly traded equity securities. Investments may decline in value for any number of reasons over which TLS may have no control, including changes in the overall market for equity securities, and factors pertaining to portfolio securities, such as management, the market for the issuer's products or services, sources of supply, technological changes within the issuer's industry, the availability of additional capital and labor, and other similar conditions.

All investments risk the loss of capital. TLS believes its investment program and research techniques moderate this risk through a careful selection of securities and other financial instruments. A Limited Partner should be aware that it may lose all or part of its investment in a TLS Fund. No guarantee or representation is made that a TLS Fund will be successful. TLS investment programs may utilize such investment techniques as taking long and short positions, leverage, margin transactions, swaps, options on securities/indexes and forward

contracts, which practices may, in certain circumstances, increase the adverse impact to which a TLS Fund may be subject.

Investments in Equity Securities

TLS Funds invest in equity securities. The value of these financial instruments generally will vary with the performance of the issuer and movements in the equity markets. As a result, a TLS Fund may suffer losses if it invests in equity instruments of issuers whose performance diverges from TLS's expectations or if equity markets generally move in a single direction and a TLS Fund has not hedged against such a general move.

Investments in Cryptocurrencies

A TLS Fund may invest in cryptocurrencies. Investing in cryptocurrency is currently unregulated, highly speculative, and volatile. The cryptocurrency and digital assets market is unpredictable. There can be no assurance that there will not be a new or unforeseen law, regulation or risk factor that will materially impact a TLS Fund's ability to continue its business as currently operated or raise additional capital to foster its continued growth.

Flexible Investment Approach

While a TLS Fund may focus on long and short equity positions, the investment strategies, approaches, and techniques described herein may evolve over time and TLS may trade in any type of security, issuer or group of related issuers, country, region, and sector that it believes will help a TLS Fund achieve its investment objective. TLS has broad latitude with respect to the management of a TLS Fund's risk parameters. Although TLS will maintain internal risk guidelines (which may be amended from time to time), a TLS Fund may make investment decisions that fall outside such guidelines. TLS may utilize such leverage, position size, duration, and other portfolio management techniques as it believes appropriate. Prospective investors must recognize that in investing in a TLS Fund, they are placing their capital indirectly under the full discretionary management of TLS and authorizing TLS indirectly to trade using whatever techniques, discretionary approaches and investment tactics TLS determines to be appropriate, each of which may not be thoroughly tested before being employed and may have operational or other shortcomings that could result in unsuccessful investments and, ultimately, losses. In addition, new techniques and tactics developed by TLS may be more speculative than earlier techniques and tactics and may involve material and as-yet-unanticipated risks that could increase the risk of an investment in a TLS Fund. Investors will not generally be informed of any non-material changes in strategies, techniques, discretionary approach, and tactics. There can be no assurance that TLS will be successful in applying its approach and there is material risk that an investor may suffer significant impairment or total loss of its capital.

Directional Trading Strategy Risk

Certain positions taken will be designed to profit from forecasting short or long-term absolute price movements in the securities of specific companies or in other assets. Predicting future prices is inherently uncertain and the losses incurred, if the market moves against a position, will often not be hedged. The speculative aspect of attempting to predict absolute price movements is generally perceived to exceed that involved in attempting to predict relative price fluctuations.

Preferred and Hybrid Securities Risks

TLS may invest in preferred stock and hybrid securities, which may have special risks. Preferred and hybrid securities may include provisions that permit the issuer, at its discretion, to defer distributions for a stated period without any adverse consequences to the issuer. If a TLS Fund owns a preferred or hybrid security that is deferring its distributions, the TLS Fund may be required to report income for tax purposes even though it has not yet received such income. Some preferred and hybrid securities are non-cumulative, meaning that the dividends do not accumulate and need not ever be paid.

Small or Mid-Sized Capitalization Issuers

Investments in equity securities of small or medium-sized market capitalization companies will have more limited marketability than the securities of larger companies. While smaller companies generally have potential for rapid growth, they often involve higher risks because they may lack the management experience, financial resources, product diversification and competitive strength of larger companies. In addition, in many instances, the frequency and volume of their trading may be substantially less than is typical of larger companies. As such, when making large sales, a TLS Fund may have to sell portfolio holdings at discounts from quoted prices or may have to make a series of small sales over an extended period due to the lower trading volume of smaller company securities.

Private Placements and Unregistered Securities

A TLS Fund may purchase equity, convertible securities, and/or fixed-income obligations, the disposition of which may be restricted under the Securities Act. Whether or not so restricted, the market to resell such securities may be illiquid. Therefore, such investments may be required to be held for a lengthy period or if a TLS Fund were forced to liquidate its position in such securities, such liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such investment.

Duration of Investment Positions

TLS may not know, except in the case of certain options or derivatives positions which have pre-established expiration dates, the maximum—or even the expected (as opposed to optimal)—duration of any position at the time of initiation. The length of time for which a position is maintained may vary significantly, from under a second to years, based on TLS's subjective judgment of the appropriate point at which to liquidate a position to augment gains or reduce losses. Transactions may involve acquiring related positions in a variety of different instruments or markets at or about the same time. Frequently, optimizing the probability of being able to exploit the pricing anomalies among these positions requires holding periods of significant length—often many months to a year or more. Actual holding periods depend on numerous market factors which can both expedite and disrupt price convergences. There can be no assurance that a TLS Fund will be able to maintain any position, or group of related positions, for the duration required to realize the expected gains, or avoid losses, from such positions.

“Widening” Risk

For reasons not necessarily attributable to any of the risks enumerated above (for example, supply/demand imbalances or other market forces), the prices of the securities in which a TLS Fund invests may decline substantially. Purchasing assets at what may appear to be “undervalued” levels is no guarantee that these assets will not be trading at even more “undervalued” levels at a time of valuation or at the time of sale. It may not be possible to predict, or to hedge against, such “spread widening” risk. Conversely, short positions may see their prices increase substantially for reasons not necessarily attributable to the risks enumerated above. TLS may not be able to predict the reasons resulting in this “widening” and may not cause a TLS Fund to hedge against such occurrences.

Expedited Transactions

Investment analyses and decisions by TLS will often be undertaken on an expedited basis to take advantage of investment opportunities. In such cases, the information available to TLS at the time of an investment decision may be limited, and TLS may not have access to the detailed information necessary for a full evaluation of the investment opportunity. In addition, TLS may rely upon independent consultants in connection with its evaluation of proposed investments. There can be no assurance that these consultants will accurately evaluate such investments.

Portfolio Turnover

The investment strategies may require TLS to actively trade a TLS Fund’s portfolio, and as a result, turnover and brokerage commission expenses may significantly exceed those of other investment entities of comparable size. In addition, active trading may act to reduce investment profits or create a loss for investors and may result in additional taxes for investors depending on the tax rules applicable to such investors. The after-tax impact of portfolio turnover is not generally considered when making investment decisions.

Short Selling

A TLS Fund’s investment program will include short selling. A short sale creates the risk of a theoretically unlimited loss, in that the price of the underlying security could theoretically increase without limit, thus increasing the cost of buying those securities to cover the short position. There can be no assurance that the securities necessary to cover a short position will be available for purchase at the time to close out such short position. Purchasing securities to close out the short position can itself cause the price of the securities to rise further, thereby exacerbating the loss. TLS will have sole discretion in determining when, whether and in what manner to engage in short selling. In addition, the securities borrowed to effect the short sale may be recalled by the lender of those securities at any time, thus forcing TLS to purchase the securities to close out the short position at a loss.

Liquidity

Some investments may lack liquidity. This could present a problem in realizing the prices quoted and in effectively trading the position(s). To the extent a TLS Fund invests in less liquid investments it could result in significant loss in value should a TLS Fund be forced to sell the less liquid investments as a result of rapidly changing market conditions or as a result of margin calls or other factors. In certain circumstances, a TLS Fund may be contractually

prohibited from disposing of investments for a specified period. Accordingly, a TLS Fund may be forced to sell its more liquid positions at a disadvantageous time, resulting in a greater percentage of the portfolio consisting of less liquid investments.

Trading in Options and Swap Agreements

A TLS Fund may buy or sell (write) both call options and put options (either exchange-traded, over-the-counter, or issued in private transactions), and when it writes options it may do so on a “covered” or an “uncovered” basis. Options transactions may be part of a hedging tactic (i.e., offsetting the risk involved in another securities position) or a form of leverage, in which a TLS Fund has the right to benefit from price movements in many securities with a small commitment of capital. These activities involve risks that can be large, depending on the circumstances.

Futures Contracts

A TLS Fund will trade in equity and bond index futures contracts and other futures contracts. Futures markets are highly volatile and are influenced by complex and inter-related factors, such as, among other things, changing supply and demand relationships, changes in interest and exchange rates, governmental, commercial and trade programs and policies designed to influence prices and/or exchange rates and world political and economic events. Trading in futures and futures options contracts involves a high degree of leverage. Futures positions also may be subject to periods of illiquidity due to “daily price fluctuation limits” or “daily limits” imposed by certain exchanges. During a single trading day, no trades may be executed at prices beyond the daily limits. Once the price of a contract for a particular futures contract has increased or decreased by an amount equal to the daily limit, positions in such contract can generally neither be taken nor liquidated. This could prevent promptly liquidating unfavorable positions and subject it to losses. Futures contract prices could move to the limit for several consecutive days with little or no trading, preventing prompt liquidation of futures positions and potentially subjecting a TLS Fund to substantial losses. It is also possible that an exchange or other regulatory authority may suspend trading in a particular contract, order immediate liquidation and settlement of a particular contract, implement retroactive speculative position limits, or order that trading in a particular contract be conducted for liquidation only.

Commissions and Expenses

A TLS Fund will pay brokerage commissions and related transaction fees which are expected to be substantial. A TLS Fund will bear these costs and fees as well as administrative fees and costs, regardless of whether it is profitable. A TLS Fund must achieve gains in excess of these aggregate fees and costs for Limited Partners’ investment to appreciate. No assurance can be given that a TLS Fund will be able to achieve such, or any, appreciation of its assets.

Insolvency Risk of Market Intermediaries

Transactions may be executed on various U.S. and non-U.S. exchanges, and may be cleared and settled through various clearing houses, custodians, depositories and clearing brokers throughout the world. While U.S. rules and regulations applicable to these market intermediaries may offer significant protections to the assets of their clients if one of them were to become insolvent, the assets held at such a market intermediary could be at risk. A

TLS Fund will attempt to execute, clear, and settle transactions through entities that TLS believes to be sound, but there can be no assurance that a failure by any such entity will not lead to a loss.

Trade Errors

Given the volume of transactions executed, investors in a TLS Fund should assume that trading errors will occur, and that a TLS Fund will benefit from any resulting gains and may be responsible for any resulting losses. Trading errors might include, for example, the purchase or sale of a security in the wrong amount or key stroke errors that occur when entering trades into an electronic trading system. TLS reserves the right to decide, on a case-by-case basis, whether a TLS Fund (and not TLS) will be responsible for any losses resulting from trading errors and similar human errors, absent willful misconduct, fraud, or gross negligence of their duties.

Extended Hours Trading

Trading occurs during the pre-market and after-market sessions. Although TLS believes that a TLS Fund will benefit from trading during extended hours, there are additional risks associated with trading during pre-market and after-market hours. Such risks include, but are not limited to the following:

- i. Risk of Lower Liquidity. There generally is lower liquidity in extended hours trading as compared to regular market hours. As a result, orders during extended hours may only be partially executed, or not at all, and a TLS Fund may be less likely to pay or receive a competitive price for securities purchased or sold during extended market hours.
- ii. Risk of Higher Volatility. There may be greater volatility in extended hours trading than in regular market hours.
- iii. Risk of Wider Spreads. Lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.
- iv. Risk of News Announcements. Typically, companies make news announcements that may affect the price of their securities before or after regular market hours. Similarly, important financial information is frequently announced outside of regular market hours. In extended hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of a security.
- v. Risk of Unlinked Markets. Depending on the extended hours trading system or the time of day, the prices displayed on a particular extended hours system may not reflect the prices in other concurrently operating extended hours trading systems dealing in the same securities.

Highly Volatile Markets

Price movements of investments held by a TLS Fund may be highly volatile and influenced by, among other things, interest rates, inflation, or deflation, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. In addition, governments from time to time intervene, directly and by regulation, in certain markets, particularly those in currencies, financial instruments, futures and options. Such intervention often is intended directly to influence prices and may, together with other

factors, cause all such markets to move rapidly in the same direction because of, among other things, interest rate fluctuations.

Currency

A TLS Fund may invest in principal instruments denominated in currencies other than the U.S. dollar, the price of which is determined with reference to currencies other than the U.S. dollar. Securities and other assets will be valued in U.S. dollars. To the extent unhedged, the value of assets held will fluctuate with U.S. dollar exchange rates as well as the price changes of investments in the various local markets and currencies. Thus, an increase in the value of the U.S. dollar compared to the other currencies in which a TLS Fund makes its investments will reduce the effect of increases and magnify the U.S. dollar equivalent of the effect of decreases in the prices of a TLS Fund's securities in their local markets. A decrease in the value of the U.S. dollar will have the opposite effect on non-U.S. dollar securities. A TLS Fund also may utilize options and forward contracts to hedge against currency fluctuations, but there can be no assurance that such hedging transactions will be effective.

Non-U.S. Investments

Investments outside the United States or denominated in non-U.S. currencies pose currency exchange risks (including blockage, devaluation, and non-exchangeability) as well as a range of other potential risks which could include, depending on the country involved, expropriation, confiscatory taxation, political or social instability, illiquidity, price volatility and market manipulation. In addition, less information may be available regarding non-U.S. investments and non-U.S. companies may not be subject to accounting, auditing and financial reporting standards and requirements comparable to or as uniform as those of U.S. companies. Transaction costs of investing outside the U.S. are generally higher than in the U.S. There is generally less government supervision and regulation of exchanges, brokers and funds than there is in the U.S. Non-U.S. investments pose certain legal risks, including that laws and regulations governing investments in securities may not exist or may be subject to inconsistent or arbitrary appreciation or interpretation, both the independence of judicial systems and their immunity from economic, political or nationalistic influences remain largely untested in many countries, and a TLS Fund may encounter difficulties in pursuing legal remedies or in obtaining and enforcing judgments in non-U.S. courts. Non-U.S. markets also have different clearance and settlement procedures which in some markets have at times failed to keep pace with the volume of transactions, thereby creating substantial delays and settlement failures that could adversely affect performance. Greater tax risks and complexities also may be associated with these investments.

Concentration of Investments

A TLS Fund may hold a few relatively large positions in the securities of companies. However, a TLS Fund generally will not invest more than twenty percent (20%) of the net asset value of its portfolio in any single asset (measured at the time of acquisition), provided that, TLS reserves the flexibility to cause a TLS Fund to exceed the foregoing guideline on a short-term basis if, considering the specific circumstances, TLS believes the risk/reward opportunity is warranted. Adverse movements in the value of the securities of such issuer or market sector could therefore result in considerably greater risks and volatility than if a TLS Fund were not permitted to concentrate its investments to such an extent. At times, the performance of

investments, if concentrated in a particular sector or sectors, may lag the performance of other market sectors or the broader market. Such underperformance may continue for extended periods of time.

Use of Leverage

A TLS Fund will have the ability to engage in borrowing or utilize leverage in order to maintain liquidity (for example, to meet withdrawal requests and expenses, which may otherwise result in having to realize investments prematurely) and with a view to enhancing its performance and facilitating its investment objectives and process. Leverage may be incurred through a variety of techniques, including reverse repurchase agreements, dollar rolls, margin financing, borrowings, total return swaps and other derivatives. TLS will be authorized to pledge or grant security interests in the assets of a TLS Fund in connection with any borrowing or other leverage.

The use of leverage may, in many instances, enable a TLS Fund to achieve a higher rate of return than would be otherwise possible. Generally, TLS will seek to balance the amount of leverage to be employed and the estimated long-term volatility of the portfolio. TLS's perception of any strategy's volatility is expected to change from time to time and the market for leverage is expected to be dynamic. Accordingly, the amount, sources and pricing of leverage utilized with respect to such strategy will also change. An inability to obtain a desired amount of leverage, however, may limit overall investment exposure and may reduce performance. Leverage may take the form of any of the financial instruments described herein, including derivative instruments and products with inherent leverage such as options, short sales, swaps, and forwards.

The use of leverage will allow a TLS Fund to borrow in order to make additional investments, thereby increasing its exposure to assets, such that its total assets are greater than its capital. The use of leverage will magnify the volatility of changes in the value of the investments made. Accordingly, any event that adversely affects the value of an investment would be magnified to the extent the investment is leveraged. The cumulative effect of the use of leverage in a market that moves adversely to its investments could result in substantial losses to a TLS Fund, which would be greater than if not leveraged. In addition, the amount of borrowings and the interest rates on those borrowings, which will fluctuate, may have a significant effect on profitability.

In general, the use of short-term margin borrowings with respect to portfolio securities results in certain additional risks. For example, should the securities pledged to brokers to secure margin accounts decline in value, a TLS Fund could be subject to a "margin call," pursuant to which a TLS Fund must either deposit additional funds or securities with the broker, or suffer mandatory liquidation of the pledged securities to compensate for the decline in value. In the event of a sudden drop in the value of the assets, a TLS Fund might not be able to liquidate assets quickly enough to satisfy its margin requirements. In such circumstances, the forced liquidation of all or a portion of a TLS Fund's portfolio at distressed prices could result in significant losses.

The financing used to leverage a portfolio is expected to be extended by securities brokers and dealers in the marketplaces in which a TLS Fund invests. While TLS attempts to negotiate the terms of these financing arrangements with such brokers and dealers, its ability to do so is limited. A TLS Fund is therefore subject to changes in the value that the broker-dealer ascribes to a given security or position, the amount of margin required to support such security or position, the borrowing rate to finance such security or position and/or such broker-dealer's willingness to continue to provide any such credit. In certain circumstances, a TLS Fund may also borrow from banks.

Reliance on Corporate Management and Reporting

Many of the strategies implemented rely on the information made available by the issuers of securities invested in. TLS has no ability to independently verify the information disseminated by such issuers and is dependent upon the integrity of both the management of these issuers and the reporting process in general.

Custodial Risk

There are risks involved in dealing with the custodians or brokers who settle trades. Securities and other assets deposited with custodians or brokers may not be clearly identified as being assets of a TLS Fund, and a TLS Fund may be exposed to a credit risk regarding such parties. In addition, not all excess cash (if any) may be considered bank deposits subject to the protections of the Federal Deposit Insurance Corporation (FDIC), but may be invested in cash-equivalent investments that are subject to different regulatory schemes. In some jurisdictions, a TLS Fund may only be an unsecured creditor of its broker in the event of bankruptcy or administration of such broker. Further, there may be practical or time problems associated with enforcing a TLS Fund's rights to its assets in the case of an insolvency of any such party.

Disciplinary Information

TLS has no legal or disciplinary events to report or disclose that would be material to an evaluation of TLS's advisory business or the integrity of its management.

Other Financial Industry Activities and Affiliations

Key management personnel associated with TLS maintain certain broker-dealer registrations with the Financial Industry Regulatory Association, Inc. ("FINRA"). Key management personnel associated with TLS are either Principals or maintain Associated Person registrations with the National Futures Association ("NFA"). Key entities affiliated with TLS are:

TradeLink Capital LLC

A commodity trading adviser and commodity pool operator registered with the CFTC and NFA Member. Harlan Moeckler and Terry Regas are NFA Associated Persons.

TradeLink L.L.C.

A proprietary trading firm.

TradeLink Securities LLC

A SEC broker/dealer and FINRA member. Primary activities conducted are market making and proprietary trading. Mark Feldberg, Jennifer Lidel, Harlan Moeckler and Terry Regas maintain registrations with FINRA.

TradeLink Worldwide Ltd.

A U.K proprietary trading firm registered with the Financial Conduct Authority.

TradeLink's principals direct the trading of a large amount of proprietary capital in the futures and futures options markets. Different accounts managed by TradeLink's principals and affiliates may pay different fees, trade with different leverage and in different portfolios and may, from time to time, compete for the same positions with TLS Funds. Trading records of other investor and proprietary accounts of TradeLink and its principals will not be made available to Clients or Fund investors.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics and Personal Trading

TLS's Code of Ethics supports a commitment to compliance with applicable laws, standards of business conduct, and fiduciary duty to clients. All personal securities transactions by employees in accounts which they control or in which they have a financial interest in must be conducted in accordance with the requirements of our Code of Ethics, which contains our personal trading policy. A copy of our Code of Ethics may be provided upon request.

TLS personnel have a professional obligation to act in an ethical and legal manner, avoiding activities, interests and relationships which run contrary (or appear to run contrary) to the best interests of TLS and its Clients. TLS personnel are required to be familiar and comply with applicable federal securities laws, rules and regulations which govern TLS's business operations. TLS personnel must place Client interests ahead of TLS's interests, engage in personal investing that is in full compliance with the Code of Ethics and avoid taking unfair advantage of their position to obtain improper personal benefits.

TLS personnel are required to disclose to TLS (upon employment, and attested to annually thereafter) in writing any brokerage, option, futures, or currency account in which they have a financial interest (direct or indirect beneficial ownership) or control over. This includes securities held by members of their immediate family (relative, spouse or significant other) sharing the same household. Written (e-mail) notification to the Chief Compliance Officer of any pending or newly opened account while affiliated with TLS is also required. TLS personnel will arrange for certain duplicate confirmations and account statements to be sent to TLS's compliance department.

Participation and Interest in Client Transactions

TLS may manage and advise additional accounts other than the TLS Funds. There is no limit on the number of accounts that may be managed or advised by TLS. TLS may have financial

incentives to favor certain other accounts over the TLS Funds. Even if TLS does not have such financial incentives, TLS is required to allocate its limited resources among the TLS Funds and the other accounts that TLS may advise.

TLS may engage in a wide variety of business transactions with parties that provide services to the TLS Funds, as well as parties that trade in the same markets as the TLS Funds. The business dealings between the Principals, TLS, and/or entities affiliated with the Principals or TLS (collectively, the “TLS Parties”), and the TLS Funds will be on what TLS believes to be an arm’s-length basis, but TLS will not necessarily give third parties an opportunity to provide such services on a competitive basis.

The TLS Parties may invest in the same instruments as the TLS Funds.

The principles of the doctrine of “corporate opportunity” or other similar rights or claims do not apply to any TLS Party’s dealings with the TLS Funds, any Investor (in such Investor’s capacity as such) or any third party.

Brokerage Practices

TLS has access to a variety of execution methods and chooses the most appropriate method to help achieve the best possible economics for Clients. In general, “best execution” means executing trades at the best net price considering all relevant circumstances surrounding the trade. While TLS generally seeks reasonably competitive trade execution cost, TLS does not necessarily pay the lowest commission or spread available provided that the difference in cost is reasonably justified by the quality of the execution services provided. In selecting broker-dealers and FCMs, TLS considers such factors as price, execution capabilities, reputation, expertise, experience, infrastructure, reliability, financial resources, financial stability, quality of services provided, confidentiality and other value-added services.

Soft Dollars

TLS generally does not enter arrangements involving “soft dollars.” The term “soft dollars” refers to the provision by brokers of services and equipment to an adviser because of the adviser trading through such broker. If TLS does enter “soft dollar” arrangements, such arrangements will fall within the safe harbor provided by Section 28(e) of the Securities Exchange Act of 1934.

In the past year TLS has received research reports from its brokers in exchange for Fund brokerage commissions. This benefits TLS as it is not required to produce such research internally and at its own expense.

Trade Errors

While carrying out trading and investing responsibilities, errors in executing specific trading instructions may occur. Trading errors are an intrinsic factor in any complex investment process, and will occur notwithstanding the exercise of due care and procedures designed to prevent trading errors. Trading errors are, therefore, distinguishable from errors in judgment, due diligence or other factors leading to a specific trading instruction being

generated, as well as from unauthorized trading or other improper conduct by TLS. TLS will treat all trading errors (including those which result in gains and those which result in losses) as for the account of the client, unless they are the result of conduct by TLS which is inconsistent with the standard of care set forth in a Fund's governing documents or Managed Account's contract.

Review of Accounts

The portfolio managers are primarily responsible for reviewing each Client portfolio. Reviews are conducted daily and conducted for several reasons, including ensuring trading is consistent with the stated investment objectives, strategies and restrictions of the client, changes in market conditions, security positions and reviewing profits and losses.

Unaudited Fund performance reports are provided in writing to Fund investors monthly. An audit opinion on the Funds annual financial statements is prepared by an independent accounting firm and provided in writing to Fund investors annually. Tax information relating to Investors in U.S. Funds is provided in writing annually.

Client Referrals and Other Compensation

N/A

Custody

Funds and securities are held by qualified custodians. Under Rule 206(4)-2 of the Advisers Act, TLS is deemed to have custody of the securities and other assets of the Funds even though TLS does not physically hold the securities and other assets, and they are not held or registered in TLS's name. Rule 206(4)-2 imposes certain requirements on registered investment advisers who have actual or deemed custody of client assets. TLS is exempt, however, from many of the provisions of that rule because each Fund is audited in accordance with U.S. generally accepted accounting principles on an annual basis by an independent public accountant that is registered with, and subject to regular inspection by, the Public Company Accounting Oversight Board, and an audit opinion on the Funds annual financial statements is distributed to each Inflation Defender Fund Investor within 120 days of the end of the Fund's fiscal year.

Investment Discretion

Pursuant to the governing documents of the TLS Funds, TLS, as General Partner/sponsor, has complete investment authority with respect to all instruments owned by those Funds and there are no limitations on this authority. This authority is conveyed by Fund investors subscribing to the Fund in their subscription agreements and in the Fund's governing documents.

Voting Client Securities

TLS has the authority to vote Client securities. TLS may refrain from voting proxies if it is in a Client's best interest. Proxy voting information may be obtained by writing to TradeLink Capital LLC, 71 S. Wacker Dr. Suite 1900 Chicago, IL 60606 Attn: Compliance.

Financial Information

TLS does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. TLS is unaware of any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. TLS has not been the subject of a bankruptcy petition at any time during the past ten years.

Privacy Policy

TLS is committed to protecting the privacy of investors' nonpublic personal information (**"personal information"**). Personal information is nonpublic information about a natural person investor that is personally identifiable and that TLS obtains in connection with providing a financial product or service to an investor. For example, personal information includes information regarding an investor's account balance and investment activity. This policy describes the personal information that TLS collects about investors, and TLS's treatment of that information. TLS collects personal information about investors from the following sources: (i) information TLS receives from an investor on managed account agreements or fund subscription documents and related forms (for example, name, address, taxpayer identification number, birth date, assets, income, and investment experience); and (ii) information about an investor's transactions with TLS, its affiliates, or others (for example, account activity and balances). TLS does not disclose any personal information it collects, as described above, about its customers or former customers other than in connection with the administration, processing and servicing of customer accounts and funds or to TLS's accountants, attorneys, and auditors, or otherwise as permitted by law. TLS restricts access to personal information it collects about an investor to its personnel who need to know that information in order to provide products or services to such investor. TLS maintains physical, electronic, and procedural controls in keeping with U.S. federal standards to safeguard investors' nonpublic personal information.