

17th January 2017

Dear [investor],

Important notice to all clients with a Freedom Bay Investment

We have received the enclosed document from Malgretoute Hotel Development Company Ltd regarding the above named investment.

Yours faithfully

Angela Murphy
Compliance Manager, 16.01.17

The Lifetime SIPP Company Ltd 8th Floor, 25 Marsh Street, Bristol, BS1 4AQ

The Lifetime SIPP Company Limited is authorised and regulated by the Financial Conduct Authority (464526)

Registered office: Vicarage Court, 160 Ermin Street,
Swindon SN3 4NE

Registered in England & Wales number 02455807

Malgretoute Hotel Development Company Ltd.

Suite No. 2, Rodney Bayside Building
Rodney Bay, Gros Islet, Saint Lucia

30th December 2016

Subject: Freedom Bay Resort, Saint Lucia

Dear Investor,

Having seen the recent circular that has been issued by Heritage Trustees, we as the Developer, wanted to write to you to set out our view of the current position and our plans.

At the outset we wish to assure you that despite the delays, which have been necessitated, by various frustrating actions of the previous Governments in St Lucia we, with the support of First Capital, which has a First Charge over the site, are committed to a continued development and completion of the resort.

As is self-evident there has been substantial delay. As we have said, these have been caused in the main by frustrating Government action that has accounted for the development being pushed back by at least two years. Fortunately, a new Government is now in place and we have had productive discussions with the new Prime Minister who has assured us of his and his Government's support for the project. Like us, we are told that the Government wants to see the development completed.

We have instructed our local lawyer in St Lucia to prepare a report in relation to the Government's action and delays, and this has been received and evidences the severe delays suffered. We have been advised that the delay in Government action constitutes a force majeure, the result of which is that the completion date in respect of each villa will have been pushed back under the various purchase contracts by at least two years.

We are now working to ascertain how best to complete the build out of the entire resort, which is so critical for the opportunity to successfully rent out the villas. We would ask that everyone would bear with us whilst we put in place a plan that we wish to communicate to you within the coming weeks, with the aim of both completing the entire development and ensuring that none of you suffers any financial loss. This is of course at odds with the sentiment shown in the recent circular from Heritage Trustees, which was sent out without our approval.

We have instructed legal and accounting advisers to advise on the best options and CBRE has now been instructed to undertake a valuation of the site. Once we have received these reports, this will enable us to progress our proposal.

It is clear that in order for the resort to be fully built out further funding is required. We have been in very early stage talks with some funders but have certainly found that there is an appetite for funders to be involved with a restructured plan. Much of course depends on the valuation for the completed resort but we are confident that it will illustrate that, once built out, the value will be more than sufficient to give a return to the various funders and also to the investors.

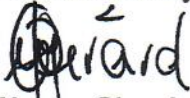
It is quite clear that apart from the delay itself, one of the issues that have led to understandable criticism of others and us has been the lack of communication. We acknowledge this and wish to assure you that we will make every effort from now on to keep you properly informed of both the situation and of our plans. Our advisors have now met with Heritage Trustees and spoken with certain SIPP trustees to discuss the best way forward. We believe that by working together both the investors and the various lenders will obtain the value that they originally expected and will become participants in a successful resort development, even if later than originally anticipated.

In order for our plans to succeed we need to bring you as well as the funders along with us. First Capital, the lender with the benefit of the First Charge, has sufficient confidence in the scheme and a belief in its ultimate success that it has expressed its intention to continue to support the project with a view to getting the development back on track.

We will look to write to you again with progress by not later than the end of January by which time we would hope to have received CBRE's valuation and, therefore, have been able to obtain a greater understanding of a sensible proposal. To reiterate, any proposal that we will make to you will seek to be on the basis that your value and protection is retained as a whole rather than seeking a percentage reduction in value for moving forward. It is inevitable that, to secure funding, we will need to reorganise matters but it will not be on the basis of prejudicing the value that you had expected to receive when entering into your contract with us.

We hope this gives you at least an element of reassurance over the festive period and look forward to speaking to you in the New Year.

Yours sincerely,

A handwritten signature in black ink that reads "Girard". The signature is written in a cursive style with a prominent loop at the beginning of the word.

Wayne Girard

Chairman

Malgretoute Hotel Development Company