



## **Regulation Best Interest Disclosure**

CPT Capital, LLC d/b/a "AstraBit," "AstraBlox," and "AstraEx"  
(Effective September 2025)

**IMPORTANT REGULATORY NOTICE:** Not all AstraBit or AstraBlox services are broker-dealer services or regulated by the SEC or FINRA. Only services explicitly identified by us as regulated should be considered as such. Other services may involve non-regulated digital assets and do not receive the protections applicable to regulated activities, including but not limited to the investor protections offered by the SIPC, etc.

### **Introduction**

CPT Capital, LLC, through its affiliated business lines AstraBit, AstraBlox, and AstraEx (collectively, "CPT," "we," or "our"), is committed to compliance with the Securities Exchange Act of 1934 and Rule 15l-1, as codified in 17 CFR Part 240, known as Regulation Best Interest ("Reg BI"). Regulation Best Interest requires broker-dealers and their associated persons to act in the best interest of retail customers at the time a recommendation is made, without placing the interests of the firm ahead of those of the customer.

CPT applies the principles of Reg BI not only to activities involving traditional securities but also to digital asset trading, staking, and tokenization conducted through non-U.S. exchanges and protocols. This disclosure sets forth the scope and terms of CPT's relationship with customers, explains the supervisory systems we have in place, and makes clear the limits of our role, particularly with respect to financial advice, clearing, custody, and leverage.

### **No Advice or Recommendations**

CPT Capital does not provide financial advice, investment advice, research reports, or individualized recommendations of any kind. We do not recommend trading strategies, account types, risk settings, or profit-taking methods. Importantly, we do not provide default or preset configurations for any trading bot or strategy. CPT does not act as a carrying firm: it neither holds customer securities nor funds. CPT only exercises transactional instructions from customers. CPT's Written Supervisory Procedures and agreements reflect that we do not custody customer-owned securities.

Services offered by CPT are fully customizable and under the exclusive control of the customer. Whether to activate a bot, how to configure risk parameters, whether to trade on margin through a third-party exchange, or when to take profits are decisions that remain solely with the customer. Customers are strongly encouraged to consult with a licensed financial professional to determine their personal risk tolerance, investment objectives, and financial circumstances before engaging with CPT's platforms.



**YOU SHOULD CONSULT WITH YOUR FINANCIAL, LEGAL AND TAX ADVISOR PRIOR TO MAKING ANY PURCHASE OR TAKING ANY RELIANCE ON CPT SOFTWARE OR PRODUCTS. NO REGISTERED REPRESENTATIVE, EMPLOYEE, OR ASSOCIATED PERSON OF CPT IS PERMITTED TO GIVE ADVICE, NOR WILL ANY CPT PERSONNEL RECEIVE COMPENSATION OR INCENTIVES FOR PROMOTING OR RECOMMENDING SPECIFIC TRADING, STAKING, OR INVESTMENT ACTIVITY.**

### **Clearing and Exchange Connectivity**

CPT does not maintain clearing agreements. Instead, each customer chooses their preferred digital asset exchange and creates an account directly with that exchange. Once the customer has established such an account, the customer may connect it to CPT's systems via application programming interface (API). Through this connection, the customer may then choose to trade manually or allow CPT's systems to execute trades automatically on their behalf, according to the customer's selected configurations.

In all cases, both the customer and CPT are subject to the API policies, terms of service, and other rules established by the customer's chosen exchange. Those exchange terms, and not CPT, govern the clearing and settlement of all trades. In practice, the exchange's terms of service and API policies operate as the customer's clearing agreement.

### **No Margin, Credit, or Leverage Offered by CPT**

CPT does not offer or provide customers with credit, margin, or leverage. Customers who wish to trade with leverage or establish a margin account must do so directly through their chosen exchange and in accordance with that exchange's terms. Customers' exchanges alone handle the approval of margin accounts, establish leverage limits, and impose any financing charges or requirements.

CPT does not have custody or hold customer fiat money or digital assets. All funds and assets remain in the customer's own exchange-linked wallet or margin account, which is controlled by a third-party exchange and not by CPT. Customers' linked wallets and/or margin accounts may be held on their preferred digital asset exchange, and CPT neither administers nor supervises the margin policies of such exchanges.

### **Customer Margin and Risk Disclosures**

Although CPT does not provide margin or leverage directly, we recognize that customers may engage in margin trading through their exchange-linked accounts. To ensure transparency and to comply with our disclosure obligations, CPT provides each customer with written statements



that explain the basic facts about purchasing digital assets or securities on margin (collectively, “Margined Assets”) and highlight the risks involved. These disclosures are designed to alert customers to the risks of margin trading, including the potential for amplified losses, forced liquidations, and the impact of exchange policies on account balances.

Customers receive these disclosures at onboarding and periodically thereafter. At least quarterly, CPT provides written statements summarizing key account information such as opening and closing balances, and fees or charges imposed by the customer’s exchange in connection with margin trading.

All disclosures are documented and retained in the customer’s file, and customers are required to acknowledge receipt of these statements. Copies are also sent electronically by email for the customer’s reference.

### **Disclosure Obligation**

CPT Capital is required under Regulation Best Interest to provide customers with full and fair disclosure of all material facts relating to the scope and terms of our relationship. These disclosures are designed to help you understand the capacity in which CPT operates, the fees and costs you may incur, the nature of the services we provide, and the limits of our role.

CPT acts strictly in a broker-dealer and technology-integration capacity. We are **not** an investment adviser and do not provide individualized advice, recommendations, or portfolio monitoring. Our role is to provide you with access to trading and tokenization infrastructure, strategy deployment tools, portfolio analysis and information tools, and clearing integrations with your preferred digital asset exchange.

Most importantly, CPT does **not** take custody of customer funds or securities. We do not operate omnibus accounts, sweep programs, or pooled custody solutions. Instead, every customer retains control of their own assets through their own Digital Asset Exchange account or, if a customer is approved to engage with AstraBlox, an Embedded Wallet Service (“EWS”) wallet, provisioned at onboarding. CPT is never provisioned with a private key, which remains with the customer and is stored on their local device. CPT has NO access to your wallet.

All transactions are initiated by you, the customer. CPT administrators cannot initiate transfers on your behalf. When you authorize a transaction, the smart contract and/or blockchain automatically handles all processing.

Purchases, withdrawals, and redemptions are executed directly to your own whitelisted wallet, without intervention by CPT. We do not hold, pool, or re-route your funds at any time. This non-custodial, EWS model means that CPT is not subject to the custody requirements of SEA Rule 15c3-3, because your assets remain under your control, segregated in your EWS wallet, and safeguarded by cryptographic enforcement.



In terms of costs, customers may incur transaction-based commissions, exchange and clearing fees charged by third-party digital asset exchanges, subscription fees for premium analytics, financing charges where exchanges provide margin services, and validator or staking fees in connection with AstraBlox vaults. These charges are imposed regardless of whether an investment is profitable and will reduce your returns. CPT discloses its own fees separately, and exchange-level fees are governed by your exchange's terms of service.

By choosing CPT, you are engaging with a **non-custodial, compliance-first infrastructure** where you remain in full control of your assets. CPT's role is to provide the secure EWS wallet framework, compliance safeguards through whitelisting, and technology that connects you to your preferred exchange, but not to act as a custodian, adviser, or fiduciary.

CPT satisfies its disclosure obligation by providing customers with full and fair disclosure of the capacity in which we act, the fees and costs customers may incur, and the services and limitations associated with our platforms. CPT does not act as an adviser or custodian. Customers may incur commissions, clearing and regulatory charges, subscription fees, staking or validator fees, and other costs associated with the use of third-party exchanges.

All services are provided on a self-directed basis. Educational and analytical tools are offered to assist customers in monitoring accounts and evaluating strategies, but these tools do not constitute recommendations.

### **Care Obligation**

CPT exercises diligence, care, and skill in the vetting and approval of strategies made available to customers. Each strategy undergoes extensive testing, with risk-adjusted returns, volatility exposures, and liquidity stress tests performed using CPT's proprietary Markowitz Portfolio System. However, CPT does not determine how strategies are to be deployed, nor do we recommend specific risk levels or portfolio allocations. The decision of whether and how to use a strategy remains entirely with the customer.

### **Conflict of Interest Obligation**

CPT Capital recognizes that conflicts of interest may arise when broker-dealers or their affiliates have the ability to influence customer transactions, control customer funds, or otherwise exercise discretion that could favor firm interests over those of customers. To eliminate or mitigate such risks, AstraBlox employs a FireBlocks Embedded Wallet Service wallet system that structurally prevents CPT from taking custody of customer funds, securities, or wallets.

Under this architecture, each customer is provisioned with an EWS wallet in which the private key is cryptographically divided between the customer and Fireblocks only. CPT has NO ability to reconstruct your key, and you, the customer, maintain control or access to your wallet and



assets. CPT cannot move customer assets, nor pool or sweep funds, or otherwise engage in conflicts of interest that could arise from discretionary custody.

AstraBlox transactions are exclusively customer-initiated. Transfers only execute when the customer has authorized the transaction, and the source is a user-provisioned EWS wallet.

CPT cannot intervene in any transfer.

Because CPT never has custody or control of customer assets, potential conflicts relating to custody, discretionary movement of funds, or commingling are structurally eliminated. Customers retain exclusive control of their wallets, and CPT's role is limited to providing a compliance-driven, non-custodial infrastructure that reviews regulatory safeguards without compromising investor control.

Additionally, CPT prohibits preferential treatment that might compromise objectivity. Any affiliation with validators, exchanges, or smart contract providers is disclosed to customers and subjected to compliance review. We do not create proprietary investment products for which CPT has an undisclosed financial interest, and we do not incentivize employees through sales contests, quotas, or non-cash compensation programs.

## **Compliance Obligation**

CPT Capital maintains written policies and procedures designed to ensure full compliance with Reg BI, FINRA and SEC supervisory rules. Our supervisory systems are specifically built on a **non-custodial model** that avoids triggering Rule 15c3-3 obligations, because CPT never takes possession, custody, or control of customer funds or securities. You will be required to open Linked Wallet(s) with third parties in order to access Services. You may subscribe to Custom Strategies offered by third parties. Your relationship with the third-party service providers will be governed by the terms and conditions of the third-party service provider. In addition, we may impose, and you agree to be bound by, the additional terms and conditions as set out in the Linked Wallet Addendum(s).

The EWS wallet framework is central to AstraBlox's compliance model. Each customer's wallet ensures that only the customer can approve or execute a transaction.

Withdrawals, redemptions, and purchases flow directly to the customer's own **whitelisted EWS wallet**, which has been independently verified through CPT's compliance program. These wallets are subject to BSA, AML, and KYC/KYT screening, and no transfers can occur until such requirements are satisfied.

All approvals are automated by policy and smart contract logic, not by discretionary human approval. There are no internal sweeps, pools, or omnibus accounts, and no commingling of customer funds at any point. This prevents CPT from exercising hidden discretion over customer



assets, while providing regulators with clear evidence that the firm's architecture is aligned with investor protection principles.

In addition to the EWS and whitelist safeguards, CPT maintains WORM-compliant supervisory records documenting all transactions, policy thresholds, and compliance interventions. Reviews are conducted quarterly to ensure accuracy, completeness, and continued alignment with regulatory requirements.

By combining its non-custodial EWS wallet structure with automated policy enforcement, CPT ensures that its compliance obligations are met at both the technological and supervisory levels. This framework gives customers assurance that their assets remain under their control at all times, while regulators are assured that CPT is operating in a manner that satisfies Reg BI, SEA Rule 15c3-3, and the broader customer protection regime.

CPT enforces a comprehensive compliance framework designed to ensure adherence to Reg BI. This includes quarterly reviews of disclosures and strategies, WORM-compliant storage of supervisory records, escalation and remediation protocols, and regular reporting to senior management and regulators. In cases where customers engage in margin trading through their exchanges, CPT ensures that the firm's disclosures are updated, that educational resources remain available, and that periodic statements reflecting margin-related activity are maintained in the customer's file.

## **Risks and Limitations**

Investing in digital assets and digital asset derivative products, including but not limited to cryptocurrencies and regulated tokenized offerings, etc., is highly speculative and involves substantial risk. Such investments are appropriate only for those customers who can bear the risk of significant or total loss. Past performance does not guarantee future results, and AstraBit makes no assurance that any investment will achieve profits or avoid losses. There is no guarantee that you will recover any or all of your invested capital. Performance outcomes may vary considerably over time, and actual results may differ materially from backtests, projections, or prior outcomes.

**CPT STRONGLY ADVISES ALL CUSTOMERS TO CONSULT LICENSED FINANCIAL, LEGAL, AND TAX PROFESSIONALS BEFORE MAKING ANY PURCHASE OR INVESTMENT DECISION INVOLVING CPT PRODUCTS.**

Digital assets are subject to continuous global price movement without a centralized closing time. This creates the potential for gap risk and uncollateralized losses during periods of extreme volatility. Because there is no defined daily close, digital asset prices may change dramatically outside of traditional business hours. Margin adequacy must therefore be recalculated in real time to avoid counterparty defaults. These risks are managed exclusively by the customer's chosen digital asset exchange.



CPT customers are bound by the terms of service of their exchanges, including all applicable liquidation and margin call procedures. As with any financial instrument, the price and value of digital assets may increase or decrease, sometimes dramatically. Past trading volumes and price levels have been highly volatile and may continue to fluctuate in the future due to macroeconomic events, fiat currency changes, regulatory developments, disasters, market participation, or other factors. Such fluctuations may result in substantial losses, illiquidity, or even the disappearance of a market for a particular digital asset altogether.

**EACH CUSTOMER MUST CAREFULLY CONSIDER WHETHER OWNERSHIP OR TRADING OF DIGITAL ASSETS IS SUITABLE FOR THEIR FINANCIAL SITUATION, KNOWLEDGE, RISK TOLERANCE, AND INVESTMENT OBJECTIVES.**

Transactions in digital assets may be irreversible, and losses caused by accidents, operational errors, or fraud may not be recoverable. Some digital asset transactions are considered legally effective when recorded on a blockchain ledger, which may not coincide with the time you initiate or complete them through CPT or a digital asset exchange. Blockchain networks, digital asset exchanges, and CPT's own infrastructure may become congested, attacked, or inoperable due to bugs, technical difficulties, disasters, hard forks, or other disruptions. During such times, customers may be unable to execute trades, which can lead to significant financial losses.

Furthermore, custom strategies designed by customers may not integrate consistently with CPT's infrastructure, potentially resulting in errors, malfunctions, or unexpected outcomes. Customers are solely responsible for assessing compatibility and monitoring the performance of custom strategies. All transactions are automatically executed based on customer instructions, and customers bear sole responsibility for determining whether any transaction or instruction is suitable for them.

There are also significant security risks. Hackers or other malicious actors may attempt to interfere with or attack AstraBit systems, customer trading bots, hardware, linked wallets, digital asset exchanges, or accounts through methods including malware attacks, denial-of-service attacks, Sybil attacks, spoofing, phishing, and other forms of malicious activity. While AstraBit employs protective measures, no system is immune to such threats, and AstraBit has no control over the protections implemented by exchanges, wallets, or third parties. Customers must understand that digital assets are not legal tender, are not backed by any government, and that their accounts are not insured by the FDIC or any comparable insurance program.

Regulatory risks are equally significant. Digital assets, digital asset transactions, and the business of CPT are subject to diverse and rapidly changing regulatory regimes worldwide. These regulations can materially affect our ability to provide services, the value of our products, or the customer's ability to achieve their objectives. They may also directly impact the value of digital assets themselves. AstraBit makes no representation about the regulatory status of any digital asset and assumes no responsibility for changes in law or policy that may affect customer holdings.





Customers must also be aware of the risks posed by blockchain forks. At any time, planned or unplanned changes to the underlying code of a blockchain may occur, resulting in one or more new versions of a digital asset. Such “forks” may be consensual, contentious, well-publicized, or obscure. They may lead to the emergence of a “dominant” version of a digital asset while rendering other versions valueless. AstraBit is under no obligation to support any fork of a digital asset, regardless of whether it results in a dominant or non-dominant version. Should AstraBit elect to support a fork, we will make a public announcement through our website.

Availability of services cannot be guaranteed. AstraBit does not warrant uninterrupted access to its systems, nor can it ensure the availability of exchanges, linked wallets, or other third-party services. Operations may be temporarily or permanently interrupted by routine maintenance, technical difficulties, regulatory actions, or extraordinary events.

Delisting risk must also be considered. A customer’s preferred digital asset exchange may remove one or more assets from trading at any time. Similarly, AstraBit may remove one or more digital assets from its membership plans or services if required by law, regulation, or internal policy. In such cases, users may lose the ability to utilize AstraBit services in connection with the delisted asset. Outstanding instructions for delisted assets may be canceled, and associated bots disabled, though AstraBit is under no contractual obligation to do so. Where feasible, AstraBit will endeavor to provide reasonable notice to customers of such delistings.

Finally, customers should understand that AstraBit services are provided strictly “as is” and “as available,” without any warranty of any kind. AstraBit disclaims all express or implied warranties, including but not limited to warranties of title, merchantability, fitness for a particular purpose, and non-infringement

## **Conclusion**

CPT Capital, through AstraBit, AstraBlox, and AstraEx, applies the requirements of Regulation Best Interest with full transparency and supervisory rigor. We do not provide financial advice, research reports, default settings, margin, credit, or leverage. We do not custody assets, nor do we maintain clearing agreements. Instead, customers select their own exchanges, connect their accounts via API, and trade under the rules of their chosen exchange. All decisions remain with the customer, who is encouraged to seek guidance from independent financial professionals.

AstraBlox services to approved customers are conducted via a non-custodial EWS wallet architecture, whitelisting safeguards, and supervisory controls that eliminate custody conflicts while preserving customer control. We do not provide advice, margin, custody, or discretionary management. All decisions remain with the customer, who is encouraged to consult independent professionals.





By maintaining this structure, CPT ensures that customer interests are placed first, while extending Reg BI principles into the evolving digital asset environment in a manner consistent with SEC and FINRA expectations.

### **Additional Information**

Additional details about CPT, and our brokerage services are available at <https://astrabit.io/>.

A current copy of the firm's Customer Relationship Summary (Form CRS), is available at all times on our website.

CPT does not assign registered representatives to manage client accounts. Our registered representatives are employed by CPT, which is a broker-dealer and not an investment advisor. Contact us at [support@astrabit.io](mailto:support@astrabit.io) if you have any concerns regarding the service that you receive.