

CASTLE PLACEMENT, LLC - CLIENT RELATIONSHIP SUMMARY DISCLOSURE ("CRS") - November 24, 2021

Castle Placement, LLC. ("Castle", "we", or "us") is a registered with the Securities and Exchange Commission as a broker-dealer and member of FINRA/SIPC. This disclosure includes information about Castle's services, fees and costs, and conflicts of interest that we are required to provide to you, as a retail investor. PLEASE RETAIN A COPY OF THIS DOCUMENT FOR YOUR RECORDS

Investment products offered through Castle are not insured by the FDIC or any other federal government agency, are not deposits or other obligations of, or guaranteed by, a bank or any bank affiliate, and are subject to investment risks, including possible loss of the principal amount invested. Investments in equity crowdfundings and private placements are extremely illiquid, and your entire investment amount could be lost.

Castle does not make recommendations of securities to investors

The company issuing securities is Castle's client

If you are an investor, you are not a customer or client of Castle

Brokerage and investment advisory services differ, and that it is important for you to understand these differences. We are not an investment advisor and do not provide investment advisory services, portfolio management, or advice or recommendations about your overall investment portfolio or the types of account(s) you should have.

Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker-dealers.

What Investment Services and Advice can you Provide Me? We do not provide any investment services, advice or recommendations to you.

Castle Investment Offerings: Our equity crowdfunding and private placement brokerage services include Regulation A+ broker/dealer services, Regulation Crowdfunding broker/dealer services, Regulation D broker/dealer services, and other investment banking services. All transactions are done on an agency basis by Castle. Castle's client is the issuer and Castle gets paid its fee from the issuer.

Castle Brokerage Services: Castle's brokerage services include a variety of investment banking services. We do not provide you with investment recommendations. Castle acts in its capacity as a broker/dealer on behalf of its client, the issuer. We do not have a fiduciary obligation to you as an investor.

Limits on Monitoring and Investment Discretion: Castle does not exercise discretionary investment authority for you (i.e., make decisions to buy or sell your investments without your direction) or monitor your investments for you. Accordingly, you are responsible for reviewing your investments to make sure your investments are appropriate for you, taking into consideration your current financial situation, existing investment portfolio, age, target returns, investment goals, and risk tolerance. Castle does not make recommendations of securities to investors. The company issuing securities is Castle's client. If you are an investor, you are not a customer or client of Castle.

Do you Provide Investment Services, Advice, or Recommendations to Me? No.

We do not provide recommendations. The way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the services we provide you. Here is an example to help you understand what this means: Compensation we receive from issuers of securities when we sell certain investments.

We only offer *agency brokerage services* to retail investors, including executing transactions in private placements and other exempt offerings under Reg CF, Reg A+, and Reg D, for issuers we represent. We do not offer investment services, advice or recommendations. We do not open brokerage accounts for investors. For further clarification, as a retail investor that is considering or actually does invest in a transaction listed on Castle's website or otherwise marketed by us, you are not our client. Our client is the issuer of the securities. Any services provided by Castle to retail investors are done so on behalf of our client, the issuer of these securities. Since retail investors in these securities are not clients of Castle and do not have accounts with Castle, Castle does not obtain any investor's specific investment profile or circumstances (current investment portfolio, income, expenses, dependents, health, goals, risk tolerance, return objectives, other obligations/liabilities, etc.). Therefore, Castle is not in a position to, and does not, make any recommendations as to whether these securities are appropriate for a specific investor or in a specific investor's best interest.

Further, any advertisements, emails and/or any other communication received by retail investors in connection with offerings contain information and representations from the Issuer – they are not recommendations by Castle to purchase these securities or representations made by Castle, and they are not a call to action for you to invest. Your decision to invest is yours alone, with the help of your professional and legal advisors.

Limitations to these offerings include: they are extremely risky and you could lose your entire investment; they are illiquid and speculative; they may not be suitable for you; the required minimum investment may be high; some offerings are only available to accredited investors or are subject to other restrictions; and fees and expenses are higher than other investments, and will reduce your return of and/or on your investment. Other risks are described more fully on our website, and in the offering materials for each investment. A particular risk to our business model is that we do not offer a diversified menu of private investments; we narrowly focus on offering securities of issuers for which we serve as managing dealer or placement agent, and the scope of our product offering is therefore limited compared to a broker that is offering you recommendations or advice. Our brokerage business is narrowly focused on the sale of securities issued by the companies that we represent.

We are an issuer's agent, which means that unless we have a written agreement with you to the contrary, we are not your agent and we do not give advice or make recommendations about specific securities, types of securities or investment strategies involving securities to you. To the extent that a solicitation or call to action is deemed to be a recommendation under U.S. law or regulation, you should be aware that we are inherently conflicted with your interests, and you should seek advice from an investment advisor or a broker who will act as your agent.

What Fees Will I Pay?

Brokerage Services:

The primary fees you pay for Castle's brokerage services are "transaction-based" fees. These fees are typically called "commissions" or "brokerage fees". These fees vary depending on the investment product you select, the capacity in which we act, and the size of the transaction, and are charged up-front when you purchase the investment.

You pay fees in connection with your investments, directly or indirectly through the issuer (or its sponsor) that has retained us, through which you make your investment. These fees vary depending on the issuer and type of security. Review the offering materials for each offering for a full discussion of fees and costs. Since we are the agent of the issuers, and are compensated by the issuers, we have a conflict of interest in that we have an incentive to sell you securities from which we stand to profit most.

Certain securities pay us, as broker, higher fees than others, and this creates an incentive for us to sell you securities on which we receive higher fees. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. If you lose money on your investment, the fees paid will increase those losses. Contact us for more information if you have questions about fees or expenses related to a product or service.

We do not provide advice or recommendations about securities, investment strategies, or investment accounts. If you seek such advice, you should establish a relationship with an investment advisor or broker to serve as your agent. If a solicitation or call to action were deemed to be a recommendation under U.S. law or regulations, then we would be subject to Regulation BI and we would be required to act in your best interest and not put our interest ahead of yours. The way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they could affect your investment results.

Description of Other Fees and Costs:

None

What are Your Legal Obligations to Me when Providing Recommendations? How else does your Firm Make Money and what Conflicts of Interests do you Have?

Castle does not make any recommendations whatsoever regarding your investment. All of our activities are done in a broker-dealer capacity. We are not an investment adviser and we do not provide investment advisory services.

A conflict of interest is a situation in which Castle engages in a transaction or activity where our interest is materially averse to your interest. Potential conflicts of interest may exist when we provide services to you. The mere presence of a conflict of interest does not imply that harm to your interests will occur, but it is important that we acknowledge the presence of such conflicts. Moreover, our regulatory obligations require that we establish, maintain, and enforce written policies and procedures reasonably designed to address potential conflicts of interest associated with any recommendations to you. We take these obligations very seriously.

It is important for investors to understand that the investor is not a customer or client of Castle, and Castle does not make recommendations of securities to investors. Furthermore, when someone invests in one of our transactions Castle receives a success fee (a percentage of the amount invested) from the issuer. This creates an inherent conflict of interest for Castle, and the investor should consider this when making his or her investment decision.

Typically, our conflicts of interest are the result of compensation structures and other financial arrangements among Castle, our Registered Representatives, and our clients. Securities rules allow for us, our Registered Representatives, and our affiliates to earn compensation when we provide brokerage services to you. However, the compensation that we and our Registered Representatives receive varies based upon the product or service you purchase, which may create a financial incentive to recommend investment products and services that generate greater compensation to Castle. This could significantly impact your investment returns.

Castle is committed to taking appropriate steps to identify, mitigate and avoid conflicts of interest. Below you will find additional information related to potential conflicts of interest. This information is not intended to be an all-inclusive list of potential conflicts, but generally describes those conflicts that may be material to you as an investor in Castle transactions. In addition to this disclosure, conflicts of interest are disclosed to you in various agreement(s) and disclosure documents and other information we make available to you, including on our website at www.castleplacement.com.

How do Your Financial Professionals Make Money?

Castle has both salaried personnel and independent contractors. Our salaried personnel (some of whom are registered representatives) receive a salary and discretionary bonus based upon their individual performance and firm performance. Our employees are prohibited from giving advice or making recommendations with respect to securities or investment strategies. Our independent contractors are registered representatives. They receive a portion of upfront fees paid to us, and commissions for the sales of securities issued. Our registered representatives, like our employees, are prohibited from giving advice or making recommendations with respect to securities or investment strategies. All of our employees and independent contractors are agency brokers, not advisors. Compensation is tied directly or derives from sales by us, which significantly makes worse the conflicts of interest described herein.

Do You or Your Financial Professionals Have Legal or Disciplinary History

Yes. While the firm does not have a legal or disciplinary history, certain registered representatives have a legal or disciplinary history to report. See investor.gov/CRS and brokercheck.finra.org/.

CONVERSATION STARTERS: Ask your financial professional:

- *How are you and your firm compensated? Are there any conflicts?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*
- *Given my financial situation, should I choose a brokerage service? Why or why not?*
- *How will you choose investments to recommend to me based on my financial situation?*
- *What services do you and your firm offer?*
- *Who is my primary contact person? Is he or she a representative of an investment advisor or broker dealer? Who can I talk to if I have concerns about how this person is treating me?*
- *Help me understand how these fees and costs might affect my investments? If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*
- *How might your conflicts of interest affect me, and how will you address them?*
- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

For additional information about our brokerage services or to obtain an updated copy of this Client Relationship Summary, please visit our website at www.castleplacement.com, call us at (212) 418-1180 or contact us in writing at Castle Placement, LLC, Attn: Compliance, 1460 Broadway, New York, NY 10036.