# Firm Brochure - Form ADV Part 2A




*This brochure provides information about the qualifications and business practices of Gaus, Inc. dba Astor. If you have any questions about the contents of this brochure, please contact us at (650) 661-9880 or by email at: founders@astor.app. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Gaus, Inc. dba Astor is also available on the SEC's website at www.adviserinfo.sec.gov. Gaus, Inc. dba Astor's CRD number is: 338424.*

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*Registration as an investment adviser does not imply a certain level of skill or training.*

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# Item 2: Material Changes

Gaus, Inc. dba Astor has the following material changes to report. Material changes relate to Gaus, Inc. dba Astor's policies, practices or conflicts of interests.

- **Trading Feature.** The Firm has introduced a trading feature under which the Firm transmits to the client's broker orders that the client has specifically approved. Item 4 has been revised to describe the feature; Item 8 to describe the strategy and its risks; Item 11 to address personal trading in light of the Firm's transmission of client orders; Item 12 to describe the Firm's brokerage practices, including that clients choose their own brokers, the brokers to which the feature can transmit client-approved orders, and its best execution review; Item 13 to describe the review of proposed transactions; Item 15 to describe the authorization the client grants the Firm at the client's broker; and Item 16 to describe the limited authority the client grants the Firm. The Firm does not exercise investment discretion over client accounts and does not have custody of client funds or securities.
- The cover page has been revised to show the new firm website and email domain.
- Item 5 ("Fees and Compensation") has been revised to describe how subscription fees are paid and refunded for subscriptions purchased through GAU's website and through Apple's In-App Purchase system.
- Item 4 ("Advisory Business") and Item 5 ("Fees and Compensation") have been revised to describe a free service tier, Astor Free, alongside the paid Astor Pro and Astor Max subscriptions.
- Items 4, 8, and 13 have been revised to state that the Firm delivers its advisory services through its mobile application and through text-messaging channels such as iMessage and WhatsApp, and that some clients receive services exclusively through a messaging channel.
- Item 8 ("Methods of Analysis, Investment Strategies, & Risk of Loss") has been revised to describe the Firm's AI-assisted, non-discretionary advisory process, to remove references to automatic rebalancing of client accounts, to define the investment universe approved for personalized recommendations, and to restate the related material risks.
- Item 13 ("Review of Accounts") has been revised to describe automated portfolio analysis, supervision of proposed transactions, and the transmission of client-approved orders through the optional trading feature.
- Item 14 ("Client Referrals and Other Compensation") has been revised to describe the Firm's active referral and promotional programs.

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# Item 4: Advisory Business

## A. Description of the Advisory Firm

Gaus, Inc. dba Astor (hereinafter "GAU") is a Corporation organized in the State of Delaware. The firm was formed in May 2025, and the principal owners are Bruno Akira Koba Sato and Daniel Tulha Hochstetler. GAU uses artificial intelligence and data processing systems to monitor financial markets, analyze securities, and generate research reports and insights for clients.

## B. Types of Advisory Services

### *Robo-Advisory Portfolio Management Services*

GAU offers a subscription-based "robo-advisory" portfolio management services through an online platform, which includes GAU's mobile application and text-messaging channels such as iMessage and WhatsApp. Some clients receive GAU's services exclusively through a messaging channel after opening an account and accepting GAU's advisory agreement and disclosures online. Clients receive personalized, non-discretionary investment advice generated using automated and AI-assisted analytical tools. This entails the use of algorithm-based portfolio management advice, rather than in-person investment advice. These automated investment solutions are customized to each client and based on individual characteristics, such as the client's age, risk tolerance, income, and current assets, among others. GAU's investment advisory personnel oversee the algorithm but may not monitor each client's account. Clients are encouraged to update their account/questionnaire with any change in their objectives, risk tolerance, or other pertinent information, as that information factors into the portfolio's composition.

GAU offers three service tiers: Astor Free, which carries no subscription fee, and two paid subscription tiers, Astor Pro and Astor Max. All tiers use the same advisory process. The features included in each tier are described in GAU's application and on GAU's website.

### *Services Limited to Specific Types of Investments*

GAU generally limits its investment advice to mutual funds, fixed income securities, equities, ETFs (including ETFs in the gold and precious metal sectors) and non-U.S. securities.

### *Trading Feature*

A client may elect to enable GAU's trading feature. A client who enables the feature connects a brokerage account (a "Trading Account") at a broker-dealer that GAU supports for the feature (a "Supported Broker") and authorizes GAU to connect to that account through the Supported Broker's authorization process. GAU's systems generate proposed

transactions and present each proposal to the client individually, showing the security, side, amount, and GAU's rationale. A proposal becomes an order only when the client approves it. The client may edit the amount or decline the proposal, and a proposal the client does not act on expires at the close of the next trading day. A client may also specify an order for GAU to transmit.

When a client approves a proposal or specifies an order, GAU transmits the resulting order to the client's Supported Broker. That is the entire scope of the authority the client grants. GAU does not determine whether, when, or in what amount any transaction occurs; does not place orders on a standing, recurring, or scheduled basis; does not rebalance client accounts or correct portfolio drift; and transmits a stop-loss or other contingent order only upon the client's specific approval of that order. GAU does not exercise investment discretion. See Item 16.

The trading feature places orders in U.S.-listed equity securities only. It does not place orders in options, digital assets, mutual funds, or fixed income securities. Whether a Trading Account is a cash or margin account depends on the client's arrangements with the Supported Broker; if the account permits margin, the buying power the Supported Broker reports to GAU may include it. GAU does not charge a separate fee for the trading feature. Availability of the feature is described in the client's advisory agreement and on GAU's website.

GAU does not receive, and does not expect to receive, any compensation from any Supported Broker in any form, including referral fees, revenue sharing, rebates, marketing support, or reduced fees. See Items 12 and 14.

### *Written Acknowledgement of Fiduciary Status*

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We also have a fiduciary duty under the Investment Advisers Act of 1940 with respect to all client accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

## C. Client Tailored Services and Client Imposed Restrictions

GAU provides online "robo-advisory" portfolio management. GAU tailors its advisory services using client-provided information beyond standard risk tolerance, including investment objectives, time horizon, current portfolio composition, liquidity needs, and client-imposed constraints or preferences. The algorithm incorporates these inputs, together with quantitative and fundamental analysis, to generate personalized, non-discretionary investment recommendations. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent GAU from properly servicing the client account, or if the restrictions would require GAU to deviate from its standard suite of services, GAU reserves the right to end the relationship.

## D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. GAU does not participate in wrap fee programs.

## E. Assets Under Management

GAU has the following assets under management:

| Discretionary Amounts: | Non-discretionary Amounts: | Date Calculated: |
|---|---|---|
| $0 | $0 | January 2026 |

# Item 5: Fees and Compensation

## A. Fee Schedule

### *Robo-Advisory Portfolio Management Services Fees*

Astor Free carries no subscription fee. Astor Pro is available for $14.99 per month or $119.99 per year. Astor Max is available for $39.00 per month or $379.99 per year. Subscription fees are billed in advance based on the selected plan.

## B. Payment of Fees

***Payment of Robo-Advisory Portfolio Management Fees***

Clients pay subscription fees in advance, either through GAU's website, where payments are processed by Stripe, or through Apple's In-App Purchase system. Clients on Astor Free are not billed.

## C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e., custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by GAU. GAU does not receive any portion of any fee charged by a Supported Broker. Please see Item 12 of this brochure regarding broker-dealer/custodian.

## D. Prepayment of Fees

For subscriptions purchased through GAU's website, a client may cancel within five business days of subscribing for a full refund. After that, a client may cancel at any time. Cancellation stops future charges, and the client keeps access through the end of the current billing period. Refunds are issued to the original payment method.

Subscriptions purchased through Apple's In-App Purchase system are subject to Apple's cancellation and refund policies. Refund requests for those subscriptions must be submitted through Apple, and GAU does not control or guarantee Apple's approval of a refund.

## E. Outside Compensation For the Sale of Securities to Clients

Neither GAU nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

# Item 6: Performance-Based Fees and Side-By-Side Management

GAU does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

# Item 7: Types of Clients

GAU generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals

There is no account minimum for any of GAU's services.

# Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

## A. Methods of Analysis and Investment Strategies

Gaus uses technology-enabled methods of analysis, including artificial intelligence, natural language processing, and automated data processing, to monitor markets and provide investment research. The Firm's systems analyze financial data, news, regulatory filings, company fundamentals, and other sources to generate reports and insights.

### *Methods of Analysis*

GAU's methods of analysis include AI-assisted and automated analysis, fundamental analysis, quantitative analysis, and asset allocation and diversification analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, financial ratios, analyst estimates and ratings, and company news and other issuer or fund information available through the platform's market data providers.

**Quantitative analysis** deals with measurable factors, such as a client's risk profile and portfolio characteristics. GAU uses a weighted risk-assessment questionnaire to determine each client's risk profile and corresponding target asset allocation, and computes portfolio metrics such as beta, Sharpe ratio, diversification measures, concentration levels, fund overlap, and potential tax-loss-harvesting opportunities.

**AI-Assisted and Automated Analysis.** GAU uses AI-assisted tools, automated data processing, client-provided information, connected-account or portfolio information, and market or reference data available through the platform to formulate personalized, non-discretionary investment advice. GAU's analysis may consider a client's investment objectives, risk tolerance, time horizon, current holdings, account balances, asset allocation, liquidity needs, investment preferences or restrictions, and other information provided by the client or available through connected accounts.

**Client-Specific Recommendations.** Recommendations may vary based on the client's profile, holdings, objectives, risk tolerance, questions, preferences, restrictions, and other information available through the platform. GAU's system may apply different analytical concepts depending on the client's circumstances and the nature of the client's request.

**Portfolio and Market Review.** GAU may use connected-account or portfolio information and market or reference data to identify portfolio characteristics, concentrations, exposures, allocation issues, market developments, or other factors relevant to a client's investment decisions. The analysis is based on information available through the platform and information provided by the client.

**Personalized Advice and General Information.** GAU may provide personalized investment analysis or recommendations based on a client's profile, holdings, investment objectives, risk tolerance, or other client-specific information. GAU may also provide general investment education, market commentary, explanations of investment concepts, or platform support that are not based on the client's individual circumstances.

**Non-Discretionary Advisory Process.** GAU provides advice on a non-discretionary basis. Clients are responsible for deciding whether to follow a recommendation and for implementing any investment decision through their own brokerage or other financial accounts. GAU does not automatically rebalance client accounts and, except for transmitting client-approved orders through the trading feature described in Item 4, does not place orders for client accounts.

### *Investment Strategies*

**Non-Discretionary Recommendations.** GAU provides personalized, non-discretionary investment advice through its platform. Recommendations may vary based on the client's investment objectives, risk tolerance, time horizon, holdings, preferences, restrictions, questions, and other information available through the platform.

**Portfolio and Allocation Observations.** GAU may provide portfolio observations, allocation considerations, market updates, risk observations, or recommendations regarding securities or investment exposures within the scope of its advisory services. GAU may incorporate investment strategies such as long-term investing, diversification, strategic asset allocation, periodic rebalancing recommendations, and tax-aware investing (including tax-loss-harvesting recommendations).

**Client Implementation.** GAU does not exercise discretionary authority and does not automatically rebalance client accounts. Except for transmitting client-approved orders through the trading feature described in Item 4, GAU does not place orders for client accounts. Clients are responsible for deciding whether to follow a recommendation and for implementing investment decisions through their own brokerage or other financial accounts.

**Trading Feature.** For clients who enable GAU's trading feature, GAU generates proposed transactions in U.S.-listed equity securities based on the client's profile and market data,

using the methods of analysis described above, and, upon the client's approval of an individual proposal, transmits the resulting order to the client's Supported Broker. A client may also specify an order for GAU to transmit. Orders may be market or limit orders and may be placed for a dollar amount or a number of shares; dollar-based orders may result in fractional share positions. A purchase that exceeds the cash available in the account may be held until sufficient cash becomes available and is cancelled if cash does not become available within approximately three days.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## B. Material Risks Involved

### *Methods of Analysis*

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Quantitative analysis** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

### *Investment Strategies*

**Long-term investing** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**AI-Assisted Analysis Risk.** GAU uses AI-assisted tools and automated data processing to support its investment analysis and recommendations. AI-generated analysis may contain factual errors, unsupported conclusions, or outputs that do not fully account for a client's financial circumstances, investment objectives, risk tolerance, restrictions, or other relevant information. These limitations may affect the quality or appropriateness of the advice provided.

**Client and Portfolio Data Risk.** GAU's analysis depends on information provided by the client and information available through the platform, including connected-account or portfolio information. If this information is incomplete, stale, inaccurate, unavailable, incorrectly categorized, or not updated by the client, GAU's analysis, insights, or recommendations may be incomplete or inappropriate.

**Connected-Account and Third-Party Data Risk.** Account connections, data aggregators, and third-party data feeds may experience delays, outages, broken connections, data-mapping errors, classification errors, or other limitations. These issues may affect the accuracy or completeness of the information available to GAU and the relevance of portfolio insights, market updates, or recommendations.

**Messaging Channel Risk.** GAU may deliver advice and receive client instructions through third-party messaging services such as Apple iMessage and WhatsApp. GAU does not control those services. Messages may be delayed, delivered out of order, truncated, or not delivered; a client's device or messaging account may be lost, shared, or compromised; and the services may change their terms or availability without notice. Clients who receive GAU's services exclusively through a messaging channel should keep their contact details current and should not rely on a messaging channel for time-sensitive instructions during an outage.

**Client Input Risk.** AI-generated responses may misunderstand a client's question, profile information, investment restrictions, or other inputs. Responses may also vary depending on how the client phrases a question or request. Incomplete or unclear inputs may result in incomplete or inappropriate responses.

**Market and Event Risk.** AI-generated analysis may not fully reflect fast-moving market events, issuer-specific developments, trading halts, liquidity conditions, economic developments, regulatory changes, or other time-sensitive information. Recommendations or insights may become outdated after they are generated.

**Limited Human Review Risk.** AI-generated responses may be delivered to clients without review by an advisory representative before delivery. Although GAU supervises and tests its advisory process, not every output may be reviewed by a person before the client receives it.

**Non-Discretionary Implementation Risk.** GAU does not automatically rebalance client accounts and, except for transmitting client-approved orders through the trading feature described in Item 4, does not place orders for client accounts. Clients are responsible for deciding whether to follow a recommendation and for implementing investment decisions through their own brokerage or other financial accounts. Delays or errors in implementation may affect investment results.

**Risk of Loss.** Investing in securities involves risk of loss that clients should be prepared to bear. GAU's analysis, insights, and recommendations do not guarantee any particular investment result.

**Existing Out-of-Universe Holdings Risk.** Clients may hold securities or asset classes outside GAU's approved recommendation universe. GAU's review of those holdings may be limited to identifying portfolio-level risks, concentrations, or exposures. GAU may not provide detailed security-specific analysis of those holdings, and any recommendation to reduce or exit an exposure may not reflect all risks, tax consequences, liquidity considerations, or other factors relevant to the client.

**Risks Specific to the Trading Feature.** Clients who enable GAU's trading feature are exposed to the following additional risks.

*Order execution risk.* Market orders are executed at prices available at the time of execution, which may be materially more or less favorable than the price displayed to the client at the time of approval, particularly in volatile or illiquid markets or outside of regular trading hours. Limit orders are executed only at the limit price or better, so a limit order might never be filled or might be filled only in part.

*Automated generation risk.* Proposals are generated by automated and AI-assisted systems. GAU's investment advisory personnel oversee those systems and may override or suspend their output, but do not individually review each proposal presented to each client. AI systems may produce errors, may rely on data that is delayed, incomplete, or inaccurate, and may generate output that appears authoritative but is incorrect. An order a client specifies is not a recommendation by GAU.

*Broker and execution risk.* The trading feature operates only through Supported Brokers. Each order is transmitted to the Trading Account the client approves for that order. GAU does not compare execution quality across brokers and cannot obtain execution outside the client's Trading Accounts. Clients may not receive terms as favorable as they might obtain through another broker.

*Connectivity, rejection, and outage risk.* A Supported Broker may reject, delay, or fail to execute an order and may not provide a reason for rejection. A Supported Broker may make no commitment to GAU regarding uptime, outage notification, order handling, data security, or breach notification, and may suspend or terminate GAU's connectivity at any time. If connectivity is unavailable, GAU cannot transmit orders.

*Revocation risk.* A client may revoke GAU's authorization at any time. Revocation prevents GAU from transmitting further orders but does not cancel or unwind an order that has already been transmitted, which may still execute.

*Cash settlement risk.* An approved purchase that exceeds the cash available in the account is held and is cancelled if sufficient cash does not become available within approximately three days. If sufficient buying power becomes available during the approximately three-day period, GAU may transmit the previously approved order without obtaining additional client approval. A Supported Broker may make buying power available from a pending deposit before it settles, in which case a held order may be placed before the deposit settles. Prices may change materially while an order is held.

*Margin risk.* Transactions involving margin borrowing may result in interest charges, increased investment losses, and forced liquidation of securities by the broker.

*Fractional share risk.* Purchases placed for a dollar amount may result in fractional share positions. Fractional shares are generally not transferable to another broker, may need to

be liquidated upon transfer or account closing, and may exhibit different execution characteristics than whole shares.

*Concentration and diversification risk.* The trading feature places orders in U.S.-listed equity securities only. A portfolio constructed through the feature is not diversified across asset classes and is fully exposed to equity market risk. Clients should consider the feature in the context of their total assets, including assets held outside GAU.

*No fixed concentration or position-sizing limits.* GAU calibrates recommended allocations and position sizes to each client's profile and applies a system-level limit to the size of each of its own buy proposals, calibrated to the client's profile at the time the proposal is generated. Each investment basket also carries a system-generated ceiling on the share of the Trading Account recommended for it, displayed to the client as a dollar amount but not enforced when orders are placed. GAU does not impose a limit on the size of any single position: a basket comprises 2 to 10 securities, and a concentrated basket can place most of its allocation in a single security. Clients may edit the amount of any proposal, up to the account's available buying power, may approve successive proposals in the same security, and remain responsible for considering concentration in light of their overall financial circumstances, including assets held outside GAU. A portfolio concentrated in one or a few securities is exposed to greater volatility and a greater risk of loss than a diversified portfolio. GAU's other operational controls include a minimum funding amount, a minimum order size, proposal expiry, controls on the frequency of proposals generated for each client, and a pre-trade simulation retained with every approved order; these controls are operational in nature and, other than proposal sizing, are not calibrated to any individual client's risk profile.

## C. Risks of Specific Securities Utilized

GAU's advisory process may generate different security-type recommendations depending on the client's profile, holdings, investment objectives, risk tolerance, questions, and other information available through the platform. GAU limits personalized investment recommendations to the investment universe approved for use through the platform. This approved universe includes equity securities (including U.S.-listed securities of non-U.S. issuers, such as American Depositary Receipts), exchange-traded funds (including commodity-tracking ETFs such as gold and precious-metals ETFs), fixed income securities (including government and corporate bond funds and money-market instruments), and mutual funds. GAU may provide general educational information about other investment concepts or products, but such information is not intended to expand the scope of personalized recommendations beyond the approved investment universe described in this brochure.

Clients may connect accounts that contain securities or asset classes outside GAU's approved recommendation universe. GAU may identify portfolio-level risks, concentrations, or exposures involving holdings outside its approved recommendation universe and may recommend reducing, diversifying, or exiting those exposures at a

portfolio or asset-class level. GAU does not provide personalized recommendations to buy or sell specific securities outside its approved recommendation universe.

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially "time the market" is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded

in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

# Item 9: Disciplinary Information

## A. Criminal or Civil Actions

There are no criminal or civil actions to report.

## B. Administrative Proceedings

There are no administrative proceedings to report.

## C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

# Item 10: Other Financial Industry Activities and Affiliations

## A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither GAU nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

## B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither GAU nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

## C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither GAU nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

## D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

GAU does not utilize nor select third-party investment advisers.

# Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

## A. Code of Ethics

GAU has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. GAU's Code of Ethics is available free upon request to any client or prospective client.

### B. Recommendations Involving Material Financial Interests

GAU does not recommend that clients buy or sell any security in which a related person to GAU or GAU has a material financial interest.

### C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of GAU may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of GAU to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. GAU will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### D. Trading Securities At/Around the Same Time as Clients' Securities

GAU transmits to Supported Brokers orders that clients have specifically approved or specified, as described in Items 4 and 16. GAU does not aggregate client orders with orders for its representatives' accounts. GAU's Code of Ethics governs the personal securities transactions of the Firm's access persons, including reporting and pre-clearance requirements, and prohibits an access person from knowingly transacting in a security that GAU, on behalf of clients, has purchased or sold, or is proposing for purchase or sale, on the same day. GAU monitors personal securities transactions against the records of client orders that GAU maintains under Rule 204-2 of the Investment Advisers Act. GAU will never engage in trading that operates to the client's disadvantage.

## Item 12: Brokerage Practices

### A. Factors Used to Select Custodians and/or Broker/Dealers

GAU does not recommend broker-dealers. Clients choose their own broker-dealers and may act on GAU's advice at any broker. GAU's optional trading feature can transmit client-approved orders only to broker-dealers whose programmatic interface GAU has integrated with ("Supported Brokers"), all of which are registered with the SEC and members of FINRA and SIPC. GAU does not negotiate commission rates with Supported Brokers and receives nothing for integrating with them.

Because each order is transmitted to the Trading Account the client approves for that order and GAU cannot obtain execution outside the client's Trading Accounts, clients may not receive terms as favorable as they might obtain through another broker.

**Best Execution.** GAU has an obligation to seek the best execution for the orders it transmits. GAU transmits each order to the Trading Account the client approves for that order. A Supported Broker may make no representation or commitment to GAU regarding execution quality, uptime, or order handling, and may not disclose the reason an order is rejected.

Clients who do not enable the trading feature select and maintain their own brokerage accounts, place their own transactions, and receive no broker or custodian recommendation from GAU.

### *1. Research and Other Soft-Dollar Benefits*

GAU does not receive research, products, or services from any broker-dealer, including any Supported Broker, in connection with client transactions ("soft dollar benefits"), and GAU has no soft dollar arrangements.

### *2. Brokerage for Client Referrals*

GAU receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party. GAU does not receive, and does not expect to receive, any compensation from any Supported Broker in any form, including referral fees, revenue sharing, rebates, marketing support, or reduced fees.

### *3. Clients Directing Which Broker/Dealer/Custodian to Use*

Clients who enable GAU's trading feature must maintain a Trading Account with a Supported Broker, and GAU does not accept or effect clients' directions to any other broker for orders transmitted through the feature. A client who does not wish to use a Supported Broker may decline to enable the feature and continue to receive GAU's advisory services. Clients who do not enable the feature select and maintain their own brokerage accounts and place their own transactions.

## B. Aggregating (Block) Trading for Multiple Client Accounts

GAU does not aggregate or block client orders. Each proposal is approved by the client individually, and the resulting order is transmitted to the client's Supported Broker individually and sequentially. Because GAU does not aggregate orders, clients do not receive any price or cost advantage that aggregation might otherwise provide, and orders transmitted later in a sequence may execute at prices different from orders transmitted earlier.

# Item 13: Review of Accounts

## A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

GAU does not manually review each client account on a periodic basis. Through the platform, GAU may generate updated portfolio insights, alerts, market updates, or non-discretionary recommendations based on client-provided information, connected-account or portfolio information, and market or reference data. For clients who have enabled GAU's trading feature, GAU's systems generate proposed transactions from the client's profile and market data and subject each approved order to automated pre-trade review, including a pre-trade simulation that GAU retains as a record of the order. GAU's investment advisory personnel oversee those systems and may override or suspend their output. GAU does not exercise discretion or automatically rebalance client accounts and, except for transmitting client-approved orders through the trading feature, does not implement trades. Clients are responsible for deciding whether to follow any recommendation. Clients should update their profile and connected-account information when their circumstances change.

## B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Robo-advisory portfolio management accounts do not undergo non-periodic review by GAU. GAU may, however, generate updated insights, alerts, market updates, or non-discretionary recommendations in response to material market, economic, or political events or changes to the client's profile.

## C. Content and Frequency of Regular Reports Provided to Clients

GAU does not provide regular written account reports. Clients may access portfolio insights, market updates, and other available information through the platform. Official account statements and trade confirmations are provided by the client's broker or custodian.

# Item 14: Client Referrals and Other Compensation

## A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

GAU does not receive any economic benefit, directly or indirectly from any third party for advice rendered to GAU's clients.

## B. Compensation to Non – Advisory Personnel for Client Referrals

GAU compensates current clients and other persons who are not advisory personnel for client referrals and other promotional activities through programs operated by the Firm. These programs include testimonials from current clients, endorsements from non-clients, or both, as applicable. The terms, eligibility requirements, and compensation structure of each program are described in the applicable program terms made available to participants.

**Client Referral Program.** Current GAU clients may participate in the Firm's referral program, under which a participating client receives a credit equal to one month of their current subscription tier (valued at $14.99 for Astor Pro or $39.00 for Astor Max) for each set of three qualifying referrals. Participation is limited to current clients who affirmatively opt in and accept the program terms, including a representation that the participant is not subject to any disqualification event under Section 203(e) of the Advisers Act. Participating clients must accept a written referral program agreement before a referral code is issued.

**Affiliate and Endorsement Programs.** GAU engages persons who are not current clients — including content creators, influencers, and other third-party promoters — to promote the Firm's advisory services in exchange for cash compensation or other economic benefits. Participants in these programs are required to enter into a written agreement with GAU that describes the scope of promotional activities and the terms of compensation. All content produced by such participants is subject to GAU's oversight and must comply with the general prohibitions of Rule 206(4)-1(a) under the Advisers Act (the "Marketing Rule").

**Conflicts of Interest.** Clients and prospective clients should be aware that persons who participate in any of the Firm's promotional programs have a financial incentive to recommend GAU's services, regardless of whether the services are appropriate for the referred person's individual circumstances. This creates a conflict of interest. At the time of or before any testimonial, endorsement, or referral, GAU provides the prospective client with clear and prominent disclosure of (i) the promoter's relationship with GAU, including whether the promoter is a current client, (ii) whether the promoter receives compensation, (iii) the fact that the compensation arrangement creates a conflict of interest, and (iv) the material terms of the compensation arrangement, including the cash or non-cash compensation provided to the promoter. These disclosures are delivered within the applicable referral or promotional flow and are not accessible solely through a hyperlink.

GAU maintains policies and procedures reasonably designed to ensure that its promotional programs comply with the Marketing Rule, including oversight of promotional communications, content review or pre-approval processes for non-client promoters, screening for ineligible persons, and recordkeeping in accordance with Rule 204-2.

# Item 15: Custody

GAU does not take custody of client funds or securities at any time. Custody of client assets is held at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy.

A client who enables GAU's trading feature authorizes GAU to connect to the client's Trading Account through the Supported Broker's authorization process. GAU does not receive, store, transmit, or have access to the client's login credentials at the Supported Broker. The authorization permits GAU to transmit orders the client has approved and to read account information; it does not permit GAU to withdraw, transfer, or deposit cash or securities, and the interface through which GAU connects exposes no facility by which GAU could do so. Deposits to and withdrawals from the Trading Account are made by the client directly with the Supported Broker. A client may revoke GAU's authorization at any time, in GAU's application or with the Supported Broker; revocation does not cancel an order that has already been transmitted.

Clients should be aware that a Supported Broker's authorization may grant GAU read access to information regarding other accounts the client holds at that broker, including accounts on which GAU does not advise the client. GAU advises clients only with respect to the Trading Account and does not place orders for, or make recommendations to trade in, any other account. GAU may, however, consider a client's holdings in other accounts, including other accounts at the Supported Broker and accounts the client connects through third-party data aggregators, in assessing the client's overall portfolio and in formulating the investment themes from which proposals are generated, including to avoid concentrating the Trading Account in exposures the client already holds elsewhere.

# Item 16: Investment Discretion

GAU does not exercise discretionary authority over client accounts. GAU does not determine, on its own authority, whether, when, in what amount, or in which security any transaction occurs, and does not place orders on a standing, recurring, or scheduled basis; a contingent order is transmitted only upon the client's specific approval of that order.

A client who enables GAU's trading feature grants GAU limited authority to transmit to the client's Supported Broker those orders the client has specifically approved or specified, in the amounts the client has approved, promptly upon the client's approval or, for a purchase awaiting sufficient cash, when cash becomes available as described in Item 8. Each proposed transaction is presented to the client individually and becomes an order only upon the client's approval. The client may edit the recommended amount or decline any proposal, and any proposal the client does not act on expires at the close of the next trading day if no order is placed. The client may revoke GAU's authorization at any time. This limited authority is granted in the client's Investment Advisory Contract.

Clients retain full control over their investment decisions.

# Item 17: Voting Client Securities (Proxy Voting)

GAU will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

# Item 18: Financial Information

## A. Balance Sheet

GAU neither requires nor solicits prepayment of more than $1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

## B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither GAU nor its management has any financial condition that is likely to reasonably impair GAU's ability to meet contractual commitments to clients.

## C. Bankruptcy Petitions in Previous Ten Years

GAU has not been the subject of a bankruptcy petition in the last ten years.