Coinbase Capital Markets Corporation
Responses to Form CRS Conversation Starters
August 3, 2026

Question: Given my financial situation, should I choose a brokerage service? Why or why not?

Response: Coinbase Capital Markets Corporation ("CCM") provides retail investors with a self-directed brokerage app to enter orders to buy or sell exchange-listed stock, including exchange-traded funds ("ETFs") and options and trade on margin. CCM does not make recommendations, monitor accounts, provide investment advice or maintain investment discretion. If you choose to use CCM's brokerage app, you should be comfortable selecting securities on your own.

Question: How will you choose investments to recommend to me?

Response: CCM does not make recommendations regarding securities transactions or investment strategies involving securities.

Question: What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Response: CCM is a broker-dealer registered with the Securities and Exchange Commission ("SEC") and is a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). The SEC and FINRA regulate CCM, and CCM is subject to periodic SEC and FINRA examinations.

Certain employees of CCM are required to pass qualification examinations administered by FINRA. However, CCM employees are not permitted to make recommendations to CCM customers, so you will not be able to rely on the qualifications of any CCM employee in making investment decisions.

Question: 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?

Response: CCM does not charge a fee based on the value of the assets in your brokerage account. Instead, CCM will route orders you place to its clearing broker, Apex Clearing Corporation ("Apex"). Apex then routes to third-party market centers and receives a fee. Apex shares the fee it receives with us. The fee paid by third-party market centers represents an implicit cost to you. It will lower the amount you receive if you sell a security, and it will increase the amount you pay if you buy a security. The size of the fee will vary based on various factors.

In addition to transaction-based fees, CCM also charges fees for account transfers, paper statements or confirmations provided subject to availability, wire transfers, voluntary corporate action processing, and other services. Our fees are disclosed in our current fee schedule, which is available at https://coinbase.com/ccm.

<u>Question:</u> How might your conflicts of interest affect me, and how will you address them?

<u>Response</u>: CCM has certain conflicts of interest that are important for you to understand.

- *Frequent Trading.* We earn revenue each time you place an order for a securities transaction and the order is executed. As a result, we have an incentive to encourage you to trade more frequently. To address this conflict, we prohibit our employees from making recommendations to customers with respect to securities transactions.
- *Payment for Order Flow.* When we route orders to Apex for execution, we receive compensation. We have an incentive to route orders to broker-dealers and third-party market centers that pay us greater compensation. To address this conflict, we regularly review the execution quality provided by Apex.
- *Fully Paid Securities Lending.* We earn revenue by lending certain fully paid securities in your account to Apex. This creates a conflict of interest as we have a financial incentive to encourage your participation in our Fully Paid Securities Lending Program. To address this conflict, we prohibit our employees from making recommendations to customers with respect to our Fully Paid Securities Lending Program.
- *Margin Accounts*: If you apply for and are approved for margin lending in your account, you will use borrowed funds from Apex to trade a financial asset within your self-directed brokerage account. CCM may earn a share of interest on these funds. Please see CCM's Fee Schedule for applicable interest rates on amounts borrowed on margin.

In addition, CCM offers proprietary products such as stocks issued by our affiliates. The compensation CCM receives is not affected by whether you purchase, sell, or otherwise transact in proprietary products.

<u>Question:</u> As a financial professional, do you have any disciplinary history? For what type of conduct?

<u>Response</u>: No. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

<u>Question:</u> Who is my primary contact? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

<u>Response</u>: CCM does not assign registered representatives to manage client accounts. Our registered representatives are all registered with CCM, which is a broker-dealer. They are not representatives of an investment adviser. For service-related questions about your brokerage account, contact Customer Support Team at 1-888-908-7930 or by logging into your account and creating a ticket in the Help Center at https://help.coinbase.com/en. If you have concerns about how a member of our Support Team is treating you, you can contact CCMFormCRS@coinbase.com.