

<p>Introduction</p>	<p>Noesis Capital Management, Corp. (“Noesis” or “our firm”) maintains its registration with the Securities and Exchange Commission as an Investment Adviser.</p> <p>Investment advisory services and fees differ from that of brokerage services and fees. It is important for the retail investor to understand the difference. Noesis provides only investment advisory services. Our firm does not provide brokerage services.</p> <p>If you would like to learn more, free and simple tools are available to research firms and financial professionals at <a href="https://www.investor.gov/CRS">https://www.investor.gov/CRS</a> which also provides educational materials about broker-dealers, investment advisers, and investing.</p>
<p>What investment services and advice can you provide me?</p>	<p>Investment Management - Noesis provides a team approach to wealth management. All of our families have multiple points of contact within the firm and we pride ourselves on knowing the families we serve very well. Noesis provides ongoing individual portfolio management services on a discretionary and non-discretionary basis primarily involving strategies using publicly traded securities. We choose investments based upon your goals and objectives and the information that you provide to us, which is updated regularly. Clients also have the ability to impose reasonable restrictions on investing in specific, or groups of, securities within their account. Although each account is assigned to a Portfolio Manager (or PM), the firm’s PMs share information with one another on specific investments and market outlook on a continuous basis. The PM will make the ultimate portfolio decision for discretionary account transactions. This results in different holding periods for commonly held securities amongst the firm’s accounts. Clients also have the ability to impose reasonable restrictions on investing in specific, or groups of securities within their account. However, such restrictions and guidelines imposed by clients affect the composition and performance of portfolios and portfolio performance can vary from those accounts without restrictions. The PM conducts periodic account reviews for our client accounts to ensure compliance within the stated investment objectives and any other account requirements or restrictions. This review is in addition to the ongoing account review that results as a matter of course through our active management style. Clients who elect non-discretionary management must make the ultimate decision regarding the purchase or sale of investments in their account. We typically require a minimum investment of \$500,000, or an annual fee of \$5,000 to open an account but this minimum may be waived at our discretion.</p> <p>As part of our advisory services, Noesis offers informal financial planning services. These services are primarily focused on planning for future cash flow, education, succession, and retirement needs.</p> <p>For additional information, about these services, please see our firm’s ADV Part 2A, Disclosure Brochure, Items 4 and 7 which can be found here: <a href="#">Noesis ADV Part 2A</a> .</p> <p><b>CONVERSATION STARTERS. CONSIDER ASKING YOUR FINANCIAL PROFESSIONAL THESE QUESTIONS:</b></p> <p><i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i></p> <p><i>How will you choose investments to recommend to me?</i></p> <p><i>What is your relevant experience, including licenses, education, and other qualifications?</i></p> <p><i>What do these qualifications mean?</i></p>
<p>What fees will I pay?</p>	<p>Our firm charges asset-based fees. Noesis’ fees for advisory services are based on the assets you have under management with our firm. Fees are payable quarterly, in advance of management services. For more information about our fees and to review our fee schedule, please review Item 5 Fees, of our ADV Part 2A found here: <a href="#">ADV Part 2A</a>.</p> <p><i>When our firm charges you an “asset-based” fee, you should be aware that the more assets that are in your retail account, the more you will pay in fees. Therefore, the firm has an incentive to encourage you to increase the assets in your account.</i></p> <p>Fixed Fees - In very rare and limited circumstances, our firm has accepted fixed fee arrangements for clients. Fixed fees are agreed upon in writing and accepted by the client prior to offering services. For these very special arrangements, fees are based upon the size and complexity of the advisory services being offered.</p> <p>Your advisory fee does not cover all expenses. As a result, you will be responsible for any brokerage or related transaction costs, margin fees, custodian, or retirement fees. As well, clients whose funds are invested in mutual funds, money market funds, or ETFs also pay fees to the fund sponsor in addition to advisory fees. These fees include management, fund and distribution expenses and are described in each sponsor’s prospectus. Please see Items 5 and 12 of our firm’s ADV Part 2A for additional information regarding these expenses.</p>

<p>What fees will I pay?  (Continued)</p>	<p><i>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.</i></p> <p><b>CONVERSATION STARTERS. CONSIDER ASKING YOUR FINANCIAL PROFESSIONAL THESE QUESTIONS:</b> <i>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?</i></p>
<p>What are your legal obligations to me when acting as my investment adviser?</p>	<p><i>When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they affect the recommendations, we provide you. Here are some examples to help you understand what this means.</i></p> <p>Noesis has a duty to disclose all potential conflicts to you. Our firm's <a href="#">ADV Part 2A</a>, Items 10, 11 and 14 outline conflicts and potential conflicts of interest regarding our firm. The <a href="#">ADV Part 2B Supplement</a> talks about your financial consultant and outlines specific conflicts regarding that individual. Please be sure to review these pieces carefully and consult us with any questions or concerns.</p>
<p>How else does your firm make money and what conflicts of interest to you have?</p>	<p>Asset-based fees can present a conflict because they incentivize firms to encourage clients to invest additional funds in their accounts. One example of this is encouraging a client to roll over their 401(k) assets into an account that the advisor can manage and thereby earn an asset-based fee.</p> <p>Noesis generally recommends Charles Schwab &amp; Co., Inc. ("Schwab") for custody purposes. Noesis pays Schwab a "Non-Schwab Custody Fee" if custody of a referred client's account is not maintained by, or assets in the account are transferred from, Schwab. This gives Noesis an incentive to recommend that client accounts be held in custody at Schwab. In addition, Noesis receives client referrals from Schwab through Noesis' participation in the Schwab Advisor Network® ("the Service"). The Participation and Non-Schwab Custody Fees will be based on assets in accounts of Noesis' clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, Noesis will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts and execute transactions at Schwab.</p>
<p>How do your financial professionals make money?</p>	<p>Most of our financial professionals are paid a salary and entitled to bonuses for overall employment performance. Our firm, to a limited extent, will also pay certain financial professionals a portion of the management fee that we receive on assets that we manage for you. In the limited circumstances where the financial professional is paid on assets under management, you should be aware that the more your portfolio grows, whether because of market performance or additional assets under management, the greater your financial professional's compensation will be. You are never under any obligation to add new assets to your account with our firm.</p> <p><b>CONVERSATION STARTERS. CONSIDER ASKING YOUR FINANCIAL PROFESSIONAL THESE QUESTIONS:</b> <i>How might your conflicts of interest affect me and how will you address them?</i></p>
<p>Do your financial professionals have legal or disciplinary history?</p>	<p>No. For a free and simple tool to research the firm or its financial professionals please see <a href="http://Investor.gov/CRS">Investor.gov/CRS</a>.</p> <p><b>CONVERSATION STARTERS. CONSIDER ASKING YOUR FINANCIAL PROFESSIONAL THESE QUESTIONS:</b> <i>As a financial professional, do you have any disciplinary history? For what type of conduct?</i></p>
<p>Additional Information</p>	<p>Additional information on our firm can be found at: <a href="https://www.noesis-capital.com">https://www.noesis-capital.com</a> and <a href="https://adviserinfo.sec.gov/">https://adviserinfo.sec.gov/</a>.</p> <p>You can obtain a copy of this relationship summary, or any other up-to-date information, upon request and free of charge by contacting us at: 561-999-9888 or at <a href="mailto:info@noesis-capital.com">info@noesis-capital.com</a>.</p> <p><b>CONVERSATION STARTERS. CONSIDER ASKING YOUR FINANCIAL PROFESSIONAL THESE QUESTIONS:</b> <i>Who is my primary contact person?</i> <i>Is he or she a representative of an investment adviser or a broker-dealer?</i> <i>Who can I talk to if I have concerns about how this person is treating me?</i></p>