



Norton Capital Management, Inc. (NCM) is an investment adviser registered with the Securities and Exchange Commission. NCM is owned by Redmond Asset Management, LLC (RAM), a SEC-registered investment adviser. NCM is an affiliate of RAM and will operate as a subsidiary of RAM. For more information on RAM, please see the Redmond Asset Management, LLC Form ADV Part 2A Disclosure Brochure available by request or view on <https://adviserinfo.sec.gov/>. Investment advisers and broker-dealers offer different services under differing compensation structures, and it is important for retail investors like you to understand the differences between them. Educational materials about broker-dealers, investment advisers, and investing in general are available, along with free and simple tools to research firms and financial professionals, at www.investor.gov/CRS.

What investment services and advice can you provide me?

We provide tailored investment advisory services designed to meet your unique needs. Our services begin with a meeting between you and us to discuss your investment goals, risk tolerance, and liquidity needs. Based on this meeting, and with your input, we will develop a plan to help you reach your goals.

Monitoring: Our investment management services are ongoing in nature and include the continual monitoring and management of your account.

Investment Authority & Service: We offer both discretionary and non-discretionary investment advisory services, but the majority of our retail clients elect the discretionary option. When you grant us discretionary authority, we are able to buy and sell investments in your account without asking you in advance. If we do not have discretionary authority, the ultimate decision over what investments to buy or sell is yours, and we will need your express permission before making any transactions in your account. Our services are limited to the types of investments and types of investment advice. For example, we are not capable of providing continuous advice concerning an options trading strategy or continuous advice on commodities or alternative investments; nor do we offer comprehensive estate planning services. NCM does offer

limited financial planning services (at no additional fee) as part of our process of determining with the client the appropriate investment strategy.

Account Minimums: We do not impose a strict account minimum.

ADDITIONAL INFORMATION

Conversation Starters. Ask your financial professional:

- 🔗 *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- 🔗 *How will you choose investments to recommend to me?*
- 🔗 *What is your relevant experience, including licenses, education, and other qualifications? What do these qualifications mean?*

Additional information about the services we offer can be found under Item 4 and Item 7 of our Form ADV Part 2A disclosure brochure.

What fees will I pay?

Principal Fees and Costs. Our fee for asset management services is generally based on the value of your investment account under our management and is billed quarterly in advance. Our fee incorporates the active management and monitoring of your account and applies even if there are no transactions in your account during a particular billing period. Because our investment management services fee is based on the amount of assets under our management, we have an incentive to recommend that you place additional assets under our management. Our fees are generally negotiable and will vary based on the expected complexity of strategies to be pursued, among other factors.

Other Fees and Costs. In addition to the fee you pay us for our services, you are responsible for other fees and costs incurred in connection with the management of your account. These costs, such as transaction costs and brokerage or custodial fees, are charged by third parties unaffiliated with us. Certain investment products, such as mutual funds and exchange-

traded funds, charge ongoing fees to cover their internal operating costs (including portfolio management fees, legal and accounting services, and marketing expenses).

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

Conversation Starters. Ask your financial professional:

- 🔗 *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?*

sure you understand what fees and costs you are paying.

ADDITIONAL INFORMATION

Additional information about fees you may pay can be found under Item 5 of our Form ADV Part 2A disclosure brochure.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

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 can affect the investment advice we provide you.

Here are some examples:

- Because our revenue is based on the amount of assets under our management, we have an incentive to recommend that clients place additional assets under our care, along with an incentive to grow your holdings.
- We may have an incentive to select or recommend a broker-dealer for client transactions for which we have discretion based on the firm's interest in receiving the research or other products or services, rather than on the client's interest in receiving the most favorable execution.

- We could receive indirect compensation in the form of research from firms that also sell financial products, such as mutual funds or ETFs. Although we require our portfolio managers to purchase only securities that in aggregate are suitable for each client, it may create a conflict of interest to recommend an investment product to a client based on research received, rather than on the individual client's need for the financial product.

Conversation Starters. Ask your financial professional:

🔗 *How might your conflicts of interest affect me, and how will you address them?*

ADDITIONAL INFORMATION

For additional information about the conflicts of interests between you and us, please review our Form ADV, Part 2A disclosure brochure.

How do your financial professionals make money?

Our financial professionals' compensation is directly tied to the success of our firm. Our financial professionals are typically compensated with a percentage of an annual asset-based management fee. The fee is based on a percentage of your assets under management as valued by your custodian at the end of each calendar quarter. We do not receive compensation for the sale of securities. Therefore, any conflicts between you and us regarding our incentives to increase our fees apply equally to your financial professional. For example, your financial professional has an incentive to encourage you to increase the amount of assets under our management because it will increase their compensation, just as we have an incentive to grow your holdings. You are encouraged to discuss compensation, including any conflicts it may create and the steps taken to mitigate those conflicts, with your financial professional.

Do you or your financial professionals have legal or disciplinary history?

No. A free and simple search tool is available to help research financial professionals, including us, at www.investor.gov/CRS.

Conversation Starters. Ask your financial professional:

🔗 *Who is my primary contact person?*

🔗 *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?*

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Additional information about us and the services we provide, including our current version of this Form CRS, can be found online on our website, www.nortoncapital.com, or by searching our firm's name or CRD number (110398) at: www.adviserinfo.sec.gov or by contacting us at 757-623-1200.