

<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. 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>Noesis offers wealth management, investment advisory, and financial planning services to individuals, families, trusts, foundations, and business entities. We provide continuous and customized portfolio management services on either a discretionary or non-discretionary basis, depending on your investment agreement with us.</p> <ul style="list-style-type: none"> <li>• Discretionary authority means Noesis makes investment decisions on your behalf—such as buying and selling securities—without obtaining your prior consent for each transaction.</li> <li>• Non-discretionary authority means we must obtain your approval before making any trade or change in your portfolio. If we cannot reach you in a timely manner, we may be unable to act on recommended changes, especially during volatile market conditions.</li> </ul> <p>Your assigned Portfolio Manager (PM) and our internal research team monitor client accounts on an ongoing basis, taking into account your investment objectives, time horizon, risk tolerance, tax considerations, and cash flow needs. We review each account periodically and when material market or life changes occur.</p> <p>Clients may impose reasonable restrictions on the types of securities or industries in which their assets are invested (for example, excluding tobacco or fossil fuel companies). Such restrictions may affect portfolio performance compared to unrestricted accounts. Our investment recommendations are primarily focused on publicly traded securities, such as individual equities, exchange-traded funds (ETFs), mutual funds, and fixed income instruments. For certain accredited or qualified clients, we may provide limited access to alternative investments (such as private equity, limited partnerships, or non-traded REITs) when suitable and consistent with your financial objectives.</p> <p>As part of our fiduciary duty, Noesis performs initial and ongoing due diligence on the investments and managers we recommend. We emphasize a disciplined approach to portfolio construction, asset allocation, diversification, and risk management.</p> <p>In addition to investment management, Noesis provides financial planning and consultative services, which may include:</p> <ul style="list-style-type: none"> <li>• Retirement and cash flow planning</li> <li>• Education funding strategies</li> <li>• Charitable giving and estate planning coordination</li> <li>• Business succession or liquidity event planning</li> </ul> <p>These financial planning services are included as part of your advisory relationship and are not billed separately. Our firm generally recommends that clients invest at least \$1,000,000 to align with our portfolio design and service model, though we may accept accounts with a minimum of \$500,000, particularly for households or clients with long-term growth potential.</p> <p>Noesis does not provide tax or legal advice, but we may coordinate with your tax and legal advisers to help ensure that your overall plan remains cohesive.</p> <p>For clients seeking advisory-only relationships, we can provide “assets under advisement” services, where we monitor and recommend strategies, but you retain full execution authority through your custodian.</p> <p>For more detailed information about our services, please review Items 4 and 7 of our Form ADV Part 2A.</p> <p><b>CONVERSATION STARTERS. CONSIDER ASKING YOUR FINANCIAL PROFESSIONAL THESE QUESTIONS:</b>  <i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i>  <i>How will you choose investments to recommend to me?</i>  <i>What is your relevant experience, including licenses, education, and other qualifications?</i>  <i>What do these qualifications mean?</i></p>
<p>What fees will I pay?</p>	<p>Our firm charges asset-based fees for advisory services, calculated as a percentage of assets under management and billed quarterly in advance. The more assets you have in your account, the more you will pay in fees—creating a potential incentive for Noesis to encourage you to increase account assets.</p> <p>Advisory fees include cash and margin loan balances when calculating billable assets. This may create a conflict of interest, since the firm earns fees on both invested and uninvested cash as well as on leveraged balances. Noesis mitigates this by reviewing accounts regularly to ensure cash and margin levels remain appropriate for your investment objectives.</p>

<p>What fees will I pay?  (Continued)</p>	<p>In limited circumstances, Noesis may agree to a fixed-fee arrangement based on the complexity of services provided. Your advisory fee does not include all costs. You will also pay custodial, brokerage, transaction, and fund-level expenses (such as those associated with mutual funds or ETFs). These are described in Items 5 and 12 of our Form ADV Part 2A.</p> <p><b>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.</b></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><b>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.</b></p> <p>Noesis has a duty to disclose all potential conflicts to you. Our firm's ADV Part 2A, Items 10, 11 and 14 outline conflicts and potential conflicts of interest regarding our firm. The ADV Part 2B Supplement 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. Examples of Conflicts of Interest</p> <ul style="list-style-type: none"> <li>• Custodial Arrangements with Schwab: Noesis participates in the Schwab Advisor Network®, through which Schwab refers clients to the firm. Noesis pays Schwab a participation fee and may also pay a "Non-Schwab Custody Fee" if a referred client's account is held elsewhere. This creates an incentive for Noesis to recommend Schwab as custodian.</li> <li>• Insurance and Annuity Access through DPL Financial Partners: Noesis pays a subscription fee to DPL Financial Partners for access to a platform of fee-based, commission-free insurance and annuity products. Neither Noesis nor its employees are licensed to sell insurance or receive compensation from DPL or insurers. This arrangement may create a conflict of interest because Noesis may be inclined to recommend products available through DPL's platform. We mitigate this by recommending only those products that are consistent with your goals and in your best interest.</li> <li>• Affiliated Entity (Noesis B.V.): Noesis is affiliated by ownership with Noesis B.V., a registered investment advisory firm located in the Netherlands. This affiliation creates an indirect incentive for Noesis to refer international clients to Noesis B.V. or vice versa. Clients are under no obligation to accept such referrals.</li> </ul> <p>For additional information about our conflicts of interest, please review Items 10, 11, and 14 of our Form ADV Part 2A.</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 you or 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="https://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>