

MARTIN & COMPANY INVESTMENT COUNSEL

CLIENT RELATIONSHIP SUMMARY

Martin & Company, Inc dba [Martin & Company Investment Counsel](#)¹ ("Martin") is registered with the [U.S. Securities and Exchange Commission](#)² ("SEC") as an Investment Adviser. Brokerage and investment advisory services and fees differ. It is important for a retail investor to understand the differences. There are free and simple tools available for investors to research firms and financial professionals at [Investor.gov/CRS](#). This site also provides educational materials about broker-dealers, investment advisers, and investing.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Martin provides discretionary investment advisory services to retail investors. These standard services include advice about investments that are specifically chosen to meet each client's particular needs (such as risk aversion, tax considerations and overall investment goals) and include, among others, corporate and government bonds, tax-exempt bonds, common stock and other equity securities, and ETFs representing various domestic and international fixed income and equity markets. Our firm offers advisory services to individual investors in separately managed accounts. Martin's services include ongoing monitoring of your investment portfolio and at least an annual review of your investment goals. Martin manages your account(s) with discretionary authority. This means that we will be authorized by you to make investment decisions for your account(s) and will buy and sell securities for you. Martin does not limit investment options to proprietary or affiliated products. Martin's new account minimum requirement can be negotiated on a case-by-case basis. Additionally, Martin provides discretionary advisory services to institutional investors as well as pension and profit-sharing plans. For more detailed information about our services, refer to our [Form ADV Part 2A brochure](#)³.

QUESTIONS TO 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 your licenses, education and other qualifications? What do these qualifications mean?*

WHAT FEES WILL I PAY?

Description of Principal Fees and Costs: Martin charges retail investors fees based on assets under management. The services and fees are negotiable and specified in an agreement between you and Martin. Your fee will be calculated based on a percentage of the value of your investment account on the last business day of the quarter. The more assets you have, the more fees you will pay creating an incentive for us to encourage you to invest additional assets. Retail investors are billed in arrears on a quarterly basis, at the rate set forth in their Investment Management Agreement.

Description of Other Fees and Costs: Other fees charged to you that are related to your account are fees paid to the custodian and broker, fees related to mutual funds, ETFs, bonds, as well as other transactional fees.

Additional Information: *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.* The fees for investment advisory services are described in further detail in our firm's [ADV, in particular, Part 2A brochure](#), Item 5 "Fees and Compensation."

QUESTIONS TO 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?*

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 interests 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 to you. Here are some examples to help you understand what this means.

First Horizon Bank ("First Horizon"), a wholly owned subsidiary of First Horizon Corporation, and a state-chartered bank in Tennessee, is a full-service bank engaged in traditional lending, cash and/or treasury management and other services. Martin is a wholly owned subsidiary of First Horizon Corporation. Trust services and financial planning are also provided by First Horizon. First Horizon Advisors, Inc, is a wholly-owned subsidiary of First Horizon offering brokerage, advisory, and wealth management services. Martin provides investment advisory services to First Horizon. First Horizon provides custody and administrative services to some of Martin's clients pursuant to separate agreements with the clients. To alleviate any potential conflicts of interest, Martin executes trades with unaffiliated brokers. The trades are placed in random order as described in Form ADV, Part 2A brochure, Item 12 "Brokerage Practices."

Additional Information: For more detailed information regarding conflicts of interest, please see our [Form ADV, Part 2A brochure](#)³.

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL

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

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

At Martin, our financial professionals are paid a salary and non-cash compensation in the form of an employee benefits package. If a financial professional refers a new client to Martin, they will receive a percentage of the fees paid to Martin for the first year. This fee is not in addition to the annual fee you agree to in your Investment Management Agreement.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No, Martin does not have any legal or disciplinary history to report. Please see [Investor.gov/CRS](https://investor.gov/CRS) for a free search tool to research Martin and our Financial Professionals.

QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL

- *As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

ADDITIONAL INFORMATION

You may also find additional information about our Firm and your Financial Professional on the SEC's Investment Adviser Public Disclosure website at adviserinfo.sec.gov. Please call us at (865) 541-4747 for up-to-date information about our services or to request a copy of our relationship summary.

QUESTIONS TO 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?*

¹ <https://martin-co.com>

² <https://www.sec.gov>

³ <https://adviserinfo.sec.gov/firm/summary/108718>