



NORTON CAPITAL MANAGEMENT, INC.
FORM ADV – PART 2A INFORMATION

September 15, 2017

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This brochure provides information about the qualifications and business practices of Norton Capital Management, Inc. (“NCM”). If you have any questions about the contents of this brochure, please contact us at (757) 623-1200. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about NCM (CRD No. 110398), including a copy of its Form ADV Part 1, is also available on the SEC's website at www.adviserinfo.sec.gov.

References to NCM as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.

Item 2 - Material Changes

Since the last annual updating amendment to this Form ADV Part 2 was filed on July 25, 2016, Norton Capital Management, Inc. (“**NCM**”) now manages assets in excess of \$100 million. Because of this, NCM is now registered directly with the Securities and Exchange Commission (the “**SEC**”) rather than the State of Virginia. Other than NCM’s registration with the SEC, no material changes have been made to the content of this brochure since the 2016 annual updating amendment mentioned above.

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Item 4 - Advisory Business

Norton Capital Management, Inc. (“NCM”) is a Delaware corporation that provides fee-based asset management and consulting services. The firm registered as an investment adviser and began conducting business in June of 1993. NCM is owned by Raymond J. Norton and Kimberly M. Norton. NCM is not engaged in any other business other than providing investment advice.

NCM's services are described in detail below.

Asset Management Services

NCM provides asset management services to a wide variety of clients wishing to have their assets managed continuously on a discretionary or non-discretionary basis. The service begins by NCM assisting each new client in determining their investment objectives and investment restrictions. NCM also assists the client in establishing an account at a brokerage firm designated by the client. After the brokerage account is established, NCM will invest and reinvest the client's funds and securities held in the account on a discretionary or non-discretionary basis in a manner consistent with their previously identified objectives. Managing on a discretionary basis means that NCM is granted authority to make purchases and sales of investments in the amounts and at the times it deems appropriate to do so without obtaining prior permission from the client in connection with each trade made in their account. NCM typically recommends that clients establish a brokerage account with Pershing Advisor Solutions, LLC (“PAS”) and most clients typically do so. The ultimate parent of PAS is The Bank of New York Mellon Corporation.

Besides managing various types of securities for clients, such as preferred stocks, warrants, rights, common stocks, bonds, municipal securities and government bonds, a portion of the securities in clients' accounts may be held in cash or cash equivalents, including, but not limited to, money market mutual funds and bank deposits insured by the Federal Deposit Insurance Corporation. Each of these involves risk in varying degrees.

NCM utilizes the information provided by clients to provide investment recommendations. NCM may implement various short and long-term investment strategies and may give advice and take action in the performance of its duties to clients which may differ from advice given, or the timing and nature of the action taken, with respect to other client accounts. NCM will make a reasonable effort to follow all investment management restrictions and instructions expressed by clients. Clients may request consultations about the performance of their accounts as often as they wish.

Clients are asked to inform NCM promptly upon the occurrence of any changes to their financial status or investment objectives. Providing this information allows NCM to determine if a change in investment strategies is necessary or appropriate.

NCM does not guarantee the result of any recommendation it makes or action it takes. Losses can occur from receiving NCM's services, including advice involving conservative investment strategies.

As of June 30, 2017, NCM had total assets under management of \$101,000,000, consisting of \$84,600,000 under discretionary management and \$17,000,000 under non-discretionary management.

Comprehensive Advisory Services

NCM provides consulting services on an hourly fee, annual flat fee, or asset-based fee basis. Consulting services are performed in the scope requested by the client, including, but not limited to, financial and retirement planning, investment strategy determination, and analysis of the client's financial assets with recommendations for the selection and positioning of such assets. Consideration is given to risk tolerance, income needs and short and long-term financial objectives. Consulting services are typically complete with a report being provided to a client which may be in writing if requested by the client.

After an initial analysis of the client's financial situation is performed and initial advice provided, NCM also makes available ongoing consulting services (also on an hourly or asset based fee basis) designed to continue the advisory relationship and implement, update, or modify the initial advice provided.

Item 5 - Fees and Compensation

All fees charged by NCM for advisory services are negotiable and are for advisory services only. Fees paid to NCM do not include or cover transaction commissions, custodian fees, or other charges (*see* Item 12 - Brokerage Practices). Although NCM believes its fees are competitive, clients may be able to obtain similar services at higher or lower costs elsewhere.

To the extent mutual funds are included in the assets managed by NCM, clients should be aware that such funds pay their own internal advisory fees and expenses which affect their reported performance. Depending on the fund, a client may be able to invest directly in the shares of a fund without incurring any sales or advisory management fees. In addition, there are tax effects pertaining to fund share redemptions made by NCM on behalf of clients. Redemptions are taxable events which may accelerate the recognition of capital gains, and frequent redemptions may result in short term, rather than long term capital gains.

Asset Management Service Fees

Asset management services fees are based upon the value of assets under the firm's management. All NCM fees, including the minimum annual fee, may be negotiated but generally conform to the following fee schedule:

Asset Value of Account	Annual Fee
First \$500,000	1.00%
Next \$500,000	0.75%
Next \$4,000,000	0.50%
Over \$5,000,000	0.25%

The fees described above cover NCM's charges for asset management services only. Fees charged by NCM may, at NCM's discretion, be negotiated based upon a number of factors, including the type of account, kind of securities in the account, dollar value of securities, projected nature of trading for the account, number and expertise of portfolio managers necessary to manage the account and nature and scope of individual advisory services required

to properly service the account. Thus, client's receiving similar asset management advisory services may be charged different fees.

All fees due NCM are payable quarterly in advance. The initial fee, which includes the fee for the balance of the then-current calendar quarter plus the next full calendar quarter, is due in full on the date a services agreement is signed between NCM and the client and is based on the account's asset value on that date. Thereafter, quarterly fees are based upon the asset value of the account, including accrued interest and dividends receivable, on the last business day of the calendar quarter. If additional cash, securities or other investments exceeding \$20,000 are added to the account during any billing period, the applicable fees are pro-rated for the number of days remaining in the billing period and become due on the date the new assets are added. For purposes of valuing assets, the assets of related accounts may, at the discretion of NCM, be combined for fee calculation purposes. The fee schedule provided to a client may be modified or changed by NCM upon 30 days advance written notice to a client.

Fees payable to NCM for asset management services are, with the client's prior permission, automatically deducted from the client's account when due. The client will receive an invoice from NCM, as well as reports from the account's custodian, showing the fee calculation and fee amounts debited. NCM will liquidate money market shares to pay the fee and, if money market shares or cash is not available, other investments will be liquidated. Authorization for the deduction of fees from the managed account is contained in the Services Agreement. The client may terminate the authorization for automatic fee deduction at any time by notifying NCM in writing.

If, for any reason, a client decides to terminate their agreement with NCM, which a client may do by providing 10-day's advance notice to NCM, NCM will issue a pro-rata refund of the prepaid fee based on the termination date.

Consulting Advisory Service Fees

NCM's fee for Consulting Advisory Services varies from \$150 to \$450 per hour and depends upon the nature and scope of the advice requested by the client, amount and nature of research required to complete the project and the nature and number of reports requested by a client. Prior to engagement, each client signs an agreement which provides an estimate of the total fee for services. One-half of the estimated fees are due at contract signing, with the balance billed directly to the client and due after services are provided. There is a minimum fee of \$450. The fee may be waived for clients who enter into an agreement for Asset Management Services with NCM.

NCM's annual flat fee for Consulting Advisory Services is quoted after the scope of requested services is evaluated by NCM. The cost of services can range from \$450 to \$5,000 depending upon the complexity of the services requested. Annual flat fees are billed directly to the client and payable quarterly, in advance. Fees are prorated for partial quarters. Annual flat fees are waived for clients who enter into an agreement for Asset Management Services.

NCM's asset based fee for Consulting Advisory Services is quoted after the scope of requested services is evaluated by NCM, and usually ranges between .20% and .40% annually. These fees are calculated and payable in the same manner as those for Asset Management Services described above. There is a minimum annual fee of \$450.

Fees charged by NCM for Consulting Advisory Services may be negotiated based upon a number of factors, including but not limited to, the type of account, kind of securities in the account, dollar value of the account, and nature and scope of consulting services to be provided by NCM. Thus, clients receiving similar services may be charged different fees.

The agreement between NCM and a client for Consulting Advisory Services may be terminated by either party at any time by written notice to the other. Any fee due, but not yet paid by a client, is due promptly after termination of the agreement. Any unearned, prepaid fee is returned to the client.

The decision to accept any recommendation or advice provided by NCM in its Consulting Advisory Services and all decisions regarding implementation thereof are left to the client. Clients are free to implement recommended transactions through broker-dealers and other service providers other than those recommended by NCM. Clients are advised to evaluate independently the transaction execution services recommended by NCM Representatives, including the reasonableness of any transaction price and commission.

Item 6 - Performance-Based Fees and Side-by-Side Management

NCM does not charge performance-based fees. All fees are disclosed above.

Item 7 - Types of Clients

NCM makes its investment advisory services available to a wide variety of clients, including but not limited to, individuals, banks or thrift institutions, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

NCM imposes a minimum fee per year of \$2,500 for its Asset Management Services. The minimum fee, however, may be negotiated. Thus, at the minimum rate any equity or balanced portfolio whose asset value falls below \$125,000 will pay more than the 1.0% maximum annual fee percentage.

There is a minimum fee of \$450 per project for NCM's Consulting Advisory Services.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

NCM primarily engages in fundamental analysis of securities, which generally consists of evaluating securities based upon historical and projected financial performance. Risks involved with fundamental analysis include, but are not limited to, the inability to guarantee that the security will repeat its historical performance or meet its projected performance, as well as political or economic turmoil that may affect the security. No method of analysis or strategy is without risk and involves the risk of loss of client funds. Clients should be prepared to bear such risks before investing. NCM customizes its services to each individual client's needs and each account is managed on an individual basis; no specific strategy is used for every client.

NCM's main sources of information include, but are not limited to: financial newspapers, magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, company press releases, SEC filings, and other corporate filings.

NCM does not guarantee the results and losses can occur by investing in any security, or by following any strategy (including conservative investments and strategies) recommended or

applied by NCM. Investing in securities involves a risk of loss that clients should be prepared to bear.

Item 9 - Disciplinary Information

NCM does not have any disciplinary information to report regarding itself or any of its counselors or other related persons.

Item 10 - Other Financial Industry Activities and Affiliations

NCM does not currently have any other financial industry activities or affiliations that are material to its advisory business.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

NCM and its employees may buy and sell securities that they recommend to clients for purchase or sale. NCM and its representatives will process transactions for client accounts ahead of similar transactions contemplated for their own accounts. NCM strives to comply with all applicable laws and regulations governing its practices and has adopted, in its entirety, the code of Professional Practices adopted by the CFA Board in addition, NCM has established a Code of Ethics applicable to all persons at NCM who have access to confidential client records or to recommendations being made for client accounts. Designed to prevent conflicts of interest between the financial interests of clients and the interests of NCM's staff, the Code requires such "access persons" to report transactions quarterly and to report all securities positions in which they have a beneficial interest at least annually. These reporting requirements allow supervisors at NCM to determine whether to allow or prohibit certain employee securities purchases and sales based on transactions made, or anticipated to be made, in the same securities for client accounts. The Code also establishes certain bookkeeping requirements relating to the new federal reporting rules. The Code is required to be reviewed annually and updated as necessary. A complete copy of the Code is available upon request.

Item 12 - Brokerage Practices

NCM recommends that clients establish brokerage accounts with PAS to maintain custody of assets and effect trades for their accounts. NCM is independently owned and operated and not affiliated with PAS. PAS provides NCM with access to its institutional trading and custody services. PAS does not accept retail investors. These services are only available to independent investment advisors on an unsolicited basis, at no charge to them so long as a minimum of the advisor's clients' assets are maintained in accounts at PAS, and are not otherwise contingent upon any adviser committing to PAS any specific amount of business (assets in custody or trading). PAS's services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

PAS generally does not charge NCM clients for holding their funds and securities (custody), instead it is compensated by account holders through transaction commissions or other position-related fees.

PAS also makes available to NCM other products and services that benefit NCM but may not directly benefit its Clients' accounts. Some of these other products and services assist NCM in managing and administering Clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of NCM's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of NCM's accounts, including accounts not maintained at PAS. PAS also makes available to NCM other services intended to help NCM manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, regulatory compliance, and marketing. In addition, PAS may make available, arrange and/or pay for these types of services rendered to NCM by independent third parties. PAS may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to NCM. While as a fiduciary, NCM endeavors to act in its clients' best interests, NCM's recommendation that clients maintain their assets in accounts at PAS may be based in part on the benefit to NCM of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by PAS, which may create a potential conflict of interest.

NCM also has a relationship with JPMorgan through which bond orders are placed through the JPMorgan trading desk. This relationship also allows NCM to have access to research through JPMorgan that is typically only available to large institutional investors. This access acts as an incentive for NCM to continue trading bonds through JPMorgan. However NCM as a fiduciary, always endeavors to act in its client's best interests.

When exercising discretion, NCM may combine orders for more than one client's account to form a "block" order for the purpose of seeking a better price and or execution. When a block order is executed, the broker/dealer executing the order typically allocates an average execution price to all shares in the block order, which NCM then allocates to each customer's account position on a pro rata basis. Should a block order only be partially filled, available shares are distributed in a manner fair to all accounts.

Should an order error occur, it is the firm's policy to make the client's account whole.

Item 13 - Review of Accounts

Consulting advisory services and managed accounts are formally reviewed as frequently as requested by client or as deemed necessary by NCM as a result of the nature of securities in accounts, events affecting assets in an account or other reasons. Investments in managed accounts are monitored on a daily basis. The firm's President is its only portfolio manager and conducts all reviews.

Written reports listing the value of all assets in a client's managed account are provided to clients by PAS, at least quarterly in writing. NCM does not provide additional client reports unless

requested by the client. Clients receiving consulting advisory services receive reports in the frequency and scope mutually agreed to in advance between the client and NCM as part of the services agreement.

Item 14 - Client Referrals and Other Compensation

NCM does not maintain a formal relationship with any solicitor, person or firm to provide prospective client referrals in return for a fee.

Item 15 - Custody

NCM does not take custody of client funds or securities. These safekeeping services are typically provided to accounts only by the brokerage firm processing the securities transactions.

NCM has indirect custody of client funds due to the direct fee deduction from client accounts. NCM takes steps to safeguard client funds, including using a qualified custodian and providing detailed invoices to the client in addition to the fee deduction notice provided to the client by the account custodian.

To the extent a client receives any account or other investment statement from NCM, NCM recommends the client carefully compare the information in the report to the information in the custodian's statements.

Item 16 - Investment Discretion

When performing Asset Management services, NCM is generally given full discretionary authority by each client to determine, without obtaining specific client consent for each trade, the securities to buy and sell and amount of securities to buy or sell (subject to any special restrictions a client may impose). Authorization for discretionary authority is contained in the Services Agreement.

NCM does not exercise discretion to select a broker-dealer for securities transactions. However, because NCM representatives recommend, and clients typically designate, PAS to execute securities transactions recommended by NCM, NCM typically will not exercise discretion to evaluate the services of other broker-dealers.

The selection of one broker-dealer for executing orders may not allow NCM to receive research from other broker-dealers in return for commission business, to batch transaction orders with those of other clients for volume commission discounts (unless the firm selected is PAS, or to allow NCM to exercise discretion in evaluating the quality of execution services and commissions of other broker-dealers. Thus, selecting a single broker-dealer, including PAS, may not result in best price or execution of a client's transactions.

Item 17 - Voting Client Securities

The following information summarizes NCM's Policy and Procedures regarding how NCM votes proxies:

Guiding Principles

NCM's Policies and Procedures relating to voting proxies are designed to ensure that proxies are voted in the best interests of the clients. The Policies and Procedures do not apply to those situations where the client has retained voting discretion. In those situations, NCM will ensure that proxies are delivered directly to the client for voting. NCM will provide voting advice only when specifically requested. NCM will abide by specific voting guidelines on certain policy issues when requested by particular clients on a case-by-case basis.

Primary Objective

In general, proxies will be voted in a manner designed to maximize the value of client investments. NCM has contracted with Broadridge Financial Solutions ("Broadridge") and uses their Proxy Edge® platform ("PE"). As a result, NCM pays fees associated with the voting process to Broadridge, proxy voting fees are paid by NCM, but if client accounts receive a settlement on a class action law suit, Broadridge receives 20% of the client's proceeds.

PE provides proxy voting support with regard to casting votes and keeping voting records, they also respond to legal and class action notices. PE votes proxies in accordance with NCM's voting policy. When evaluating a particular proxy proposal, NCM requires that PE takes into consideration, among other things, the period of time over which the voting shares of the company are expected to be held, the size of the position, the costs involved in the proxy proposal and the existing governance documents of the affected company, as well as its management operations.

Generally, it is NCM's policy to vote in accordance with management's recommendations on most issues since the capability of management is one of the criteria used by NCM in selecting investments. Proxy proposals that change the existing status of a company will be reviewed to evaluate the desirability of the change, and to determine the benefits to the company and its shareholders, but NCM's primary objective is always to protect and enhance the economic interests of its clients.

Exceptions

When NCM believes management is acting on its own behalf, instead of on behalf of the well-being of the company and its shareholders, or when NCM believes that management is acting in a manner that is adverse to the rights of the company's shareholders, NCM will take steps to represent the interests of its clients and, as a result, may elect to vote against management's recommendations. Examples of such activity include (i) attempts by management to insulate itself from accountability to shareholders or otherwise entrench itself; and (ii) proposals that have the effect of deterring potential interests in an acquisition or similar corporate transaction at a fair price, which proposals NCM believes might have a negative impact on the value of the company or might otherwise be detrimental to company shareholders.

NCM generally favors cumulative voting for directors. In situations where NCM is extremely displeased with management's performance, it may withhold votes or vote against management's slate of directors and other management proposals as a means of communicating its dissatisfaction. This occasion most often develops when NCM believes that management has displayed a consistent inability or lack of interest in moving the company

toward achieving its potential and that a message needs to be sent that the company's shareholders are not satisfied with the status quo. NCM reviews all proposals relating to management and director compensation in light of the company's performance and corporate governance practices. NCM normally will vote against significant compensation increases or compensation not tied to company performance in instances where it believes the company is under performing and/or management has not added value to the company.

Other Factors NCM Considers

NCM recognizes that the activity or inactivity of a company with respect to matters of social, political or environmental concern may have an effect upon the economic success of the company and the value of its securities. However, NCM does not consider it appropriate, or in the interest of its clients, to impose its own moral standards on others. Therefore, it normally supports management's position on matters of social, political or environmental concern, except where it believes that a different position would be in the economic interest of company shareholders.

Conflicts

In evaluating a proxy proposal, NCM is responsible for considering whether there are any circumstances that may give rise to a conflict of interest on the part of NCM in connection with voting client proxies either because of a business relationship between NCM and the company or otherwise. If the designated voter believes that a potential conflict of interest exists, he or she must vote in a manner which favors the client's interest and should, if necessary, consult with NCM's legal counsel. If necessary, the vote should be referred to the client, or another fiduciary of the client.

Records

Appropriate records shall be prepared and maintained relating to receipt of proxies and how and when voted. Clients may obtain a copy of such records with respect to their securities by requesting such in writing from NCM. Clients may also request a copy of NCM's proxy voting policies by contacting NCM at the address noted on the cover page.

Item 18 - Financial Information

NCM does not receive fees of more than \$1,200 six months or more in advance from any client, thus no financial statement for NCM is attached. NCM does not have any financial condition that is reasonably likely to impair its ability to meet its contracted commitment to any client.

Privacy Notice

FACTS	WHAT DOES NORTON CAPITAL MANAGEMENT, INC. (“NCM”) DO WITH YOUR PERSONAL INFORMATION?		
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.		
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none">• Social Security number and employment information• Income, net worth and investment experience• Risk tolerance and retirement assets <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>		
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons NCM chooses to share; and whether you can limit this sharing.		
Reasons NCM can share your personal information		Does NCM share?	Can you limit this sharing?
For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus		Yes	No
For our marketing purposes—to offer our products and services to you		Yes	No
For joint marketing with other financial companies		No	No
For our affiliates’ everyday business purposes—information about your transactions and experiences		No	No
For our affiliates’ everyday business purposes—information about your creditworthiness		No	No
For our affiliates to market to you		No	No
For non-affiliates to market to you *If your representative terminates his or her relationship with us and moves to another investment advisory firm, we or your independent representative may disclose your personal information to the new firm, unless you instruct us not to by returning the completed Privacy Choices Notice form attached to this notice.		No	No
Questions?	Call 757-623-1200 or write to us at 440 Monticello Avenue, STE 1610, Norfolk, Virginia 23510-2670.		

Who we are	
Who is providing this notice?	Norton Capital Management, Inc. (NCM)
What we do	
How does NCM protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>We restrict access to your personal information to those employees who need it to perform their job responsibilities.</p>
How does NCM collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • enter into investment advisory contract • apply for insurance • seek financial advice <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • Non-affiliates we share with can include companies such as vendors, and other service providers.
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <p>Our joint marketing partners include categories of companies such as insurance companies.</p>
Other important information	
Norton Capital Management, Inc. is a registered investment advisor.	