

# Radius Capital Management, LLC

## Business Continuity Plan

### Contents

1.	Plan Summary.....	1
2.	Overview of Business Operations .....	1
3.	Business Structure .....	1
4.	Emergency Contact Person.....	1
5.	Office Location.....	2
6.	Custodian of Client Accounts.....	2
7.	Firm Policy .....	2
	A. Significant Business Disruptions (SBDs) .....	2
	B. Approval and Execution Authority .....	2
8.	Alternative Physical Location .....	2
9.	Clients' Access to Funds and Securities.....	3
10.	Data Storage (Hard Copy and Electronic) .....	3
11.	Operational Assessments .....	3
12.	Mission Critical Systems .....	3
	A. Radius' Mission Critical Systems .....	3
	B. Mission Critical Systems Provided by The Custodian.....	4
13.	Alternate Communications Between the Firm and Clients, Employees, Custodian, and Regulators .....	4
	A. Clients.....	4
	B. Employees .....	5
	C. Custodian.....	5
	D. Regulators.....	5
14.	Critical Business Constituents .....	5
15.	Regulatory Reporting.....	5
16.	Disclosure of Business Continuity Plan.....	5
17.	Updates and Annual Review.....	6
18.	Manager Approval .....	6

# Radius Capital Management Business Continuity Plan

## 1. Plan Summary

The Purpose of the Radius Business Continuity Plan is to have policies and procedures in place to ensure that in the event of a significant business interruption – during and/or after a disaster or other significant disturbance – critical business functions can continue and disruptions to client service can be kept to a minimum.

## 2. Overview of Business Operations

Radius Capital Management, LLC (Radius) has set up its business operations to be as “disaster resilient” as possible. This includes:

- Telephone – The Radius business number (617-661-4200) currently rings in the Radius office at 35 Bedford Court, Concord, MA and on the personal mobile phone of Kimball Halsey. Using a web interface (including one available on mobile devices) this number can be configured to ring at other locations as well.
- E-Mail – Radius’ e-mail is hosted remotely by Microsoft Online Services and can be accessed from any computer or mobile device (with proper login information).
- Books and Records – All Radius business files (including client correspondence and records) are stored (encrypted) on ShareFile’s cloud service and can be accessed from any computer or mobile device (with proper login information).
- Fidelity Account Access – Access to client accounts (including cashiering, trading, reports, etc.) is through Fidelity’s Wealhscape application and can be accessed from any computer or mobile device (with proper login information).
- Radius Financial Records – All Radius accounting data and financial reports are stored (encrypted) in Quickbooks Online service and can be accessed from any computer or mobile device (with proper login information).
- Passwords – All website and business passwords are stored (encrypted) on the Dashlane service and can be accessed from any computer or mobile device (with proper login information).
- Website – the Radius website is hosted remotely by GoDaddy.

In light of this, Radius will be able quickly to recover and resume business operations after a significant business disruption and allow clients to transact business as soon as possible.

## 3. Business Structure

Radius Capital Management, LLC is an Investment Adviser registered with the Commonwealth of Massachusetts.

## 4. Emergency Contact Person

Kimball Halsey  
617-661-4200  
[khalsey@radius-capital.com](mailto:khalsey@radius-capital.com)

**5. Office Location**

The Radius office is located at 35 Bedford Court, Concord, MA, 01742. The telephone number is 617-661-4200 and fax number is 877-877-2880. Radius' website is [www.radius-capital.com](http://www.radius-capital.com). Radius' employees may travel to that office by means of foot, car, train, etc.

**6. Custodian of Client Accounts**

All client accounts and securities are held at  
Fidelity Investments  
100 Crosby Parkway  
Covington, KY 41015  
(800) 544-6666

**7. Firm Policy**

Radius' policy is to respond to Significant Business Disruptions (SBDs) by safeguarding employees' lives and firm property, protecting all Radius documents and records, quickly resuming operations, and enabling clients to transact business. In the event that we determine we are unable quickly to resume business operations, we will notify clients and instruct them on how to get access to their funds and securities.

**A. Significant Business Disruptions (SBDs)**

This plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only Radius' ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of Fidelity Investments, the Custodian of Radius' client accounts.

**B. Approval and Execution Authority**

Kimball Halsey, president and a registered investment advisor representative of Radius, is responsible for approving the plan and for conducting the required annual review. Kimball Halsey has the authority to execute this Business Continuity Plan.

**8. Alternative Physical Location**

In the event of an SBD that renders our office location unusable, we will move our operations to the property of Sean Whalen, Managing Director at Radius, at 80 South Main Street, Natick, MA 01760. If this location is also unusable, we will move operations to Mr. Halsey's property at 2448 Route 113, Thetford, VT 05074. Radius Capital Management's main phone number (617-661-4200) will be forwarded to this location as well as to Mr. Halsey's mobile phone.

## **9. Clients' Access to Funds and Securities**

Radius clients' funds and securities are maintained at the Custodian. In the event of an internal or external SBD where telephone and Internet service are not interrupted, Kimball Halsey will continue to take client orders and instructions and contact the Custodian on the client's behalf. If telephone and Internet service are not available for Radius to continue business, clients may access their funds and securities by contacting Fidelity directly at [www.fidelity.com](http://www.fidelity.com) or 800-544-6666. When clients reach a Fidelity representative, they should identify themselves as a Radius Capital Management client and notify Fidelity that Radius Capital Management is temporarily unable to process their request.

## **10. Data Storage (Hard Copy and Electronic)**

Radius maintains its hard copy documents and records at 35 Bedford Court, Concord, MA 01742. Kimball Halsey is responsible for the maintenance of these documents and records.

Radius uses locks, shredding machines, and other appropriate physical security measures to safeguard client information stored in paper format. For example, client contracts are stored in a locked file cabinet.

Radius uses an electronic storage format to store documents and records. Typically, documents are converted to Adobe PDF files and stored on the Company's network hard drive. In addition, the documents are also stored in the cloud at ShareFile. Radius utilizes electronic measures to prevent data loss, theft, and corruption including passwords, encryption, and firewalls.

## **11. Operational Assessments**

In the event of an SBD, we will immediately identify what means will permit us to communicate with our clients, employees, critical business constituents, the Custodian, and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications methods we will use will include our website, email, telephone voice mail, etc.

## **12. Mission Critical Systems**

### **A. Radius' Mission Critical Systems**

Radius receives orders and other requests from clients via telephone, fax, email, face-to-face visits, etc. During an SBD, either internal or external, Radius will continue to take orders through any of these methods that are available and reliable. If necessary, we will advise our clients to place orders directly with the Custodian.

In the event of an internal SBD, we will send records and requests to the Custodian including placing orders, submitting accounts paperwork and cashing requests, and other requests by the fastest alternative means available. In addition, during an internal SBD, we may need to refer our clients to deal directly with the Custodian for order entry.

## Radius Capital Management Business Continuity Plan

In the event of an external SBD that also impacts the operations of the Custodian, we will maintain the records and requests in electronic or paper format and deliver them to the Custodian by the fastest means available when it resumes operations.

### B. Mission Critical Systems Provided by The Custodian

The Custodian ensures prompt and accurate reporting of securities holdings and the processing of securities transactions, including order implementation, reconciliation, comparison, allocation, clearance and settlement of securities transactions, the maintenance of client accounts, and the delivery of funds and securities.

The Custodian has informed us that it has a business continuity plan and the capacity to execute that plan. The Custodian represents that it will advise us of any material changes to its plan that might affect our ability to operate our business. In the event the Custodian executes its plan, it represents that it will notify us of such execution and provide us equal access to services as its other clients. If we reasonably determine that the Custodian has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, the Custodian represents that it will assist us in seeking services from an alternative source.

The Custodian represents that it backs up our records at a remote operating facility in a geographically separate area with the capability to conduct the same volume of business as its primary site. The Custodian has also confirmed the effectiveness of its back-up arrangements to recover from a wide scale disruption by testing, and it has confirmed that it tests its back-up arrangements regularly.

Kimball Halsey will periodically review the Custodian's capabilities to perform the mission critical functions the Custodian has contracted to perform for Radius

## **13. Alternate Communications Between the Firm and Clients, Employees, Custodian, and Regulators**

### A. Clients

Radius now communicates with clients using the telephone, email, our website, fax, U.S. mail, and in-person visits at Radius or another location. In the event of an SBD, Radius will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by email but the Internet is unavailable, Radius will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

## Radius Capital Management Business Continuity Plan

### B. Employees

Radius now communicates with our employees using telephone, email, and in person. In the event of an SBD, Radius will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with our employees.

### C. Custodian

Radius now communicates with the Custodian using Fidelity's Wealthealth online service, telephone, email, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the Custodian.

### D. Regulators

Radius is regulated by the Securities Division of the Office of the Secretary of the Commonwealth. Radius communicates with the regulators using telephone, email, fax, U.S. mail, in person, etc. In the event of an SBD, Radius will assess which means of communication are still available, and use the means closest in speed and form (written or oral) to the means that Radius used in the past to communicate with the other party.

## 14. Critical Business Constituents

Radius has contacted our critical business constituents defined as those businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services, and have determined the extent to which we can continue our business relationship with them in light of an internal or external SBD. Radius will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of an SBD to them or Radius.

## 15. Regulatory Reporting

Radius is subject to regulation by the Securities Division of the Office of the Secretary of the Commonwealth. We now file reports with our regulators using the Internet (IARD/CRD system), paper copies in the U.S. mail, and electronically using fax and/or email. In the event of an SBD, we will check with the regulator to determine which means of filing are still available to us, and use the means closest in speed and form to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

## 16. Disclosure of Business Continuity Plan

Radius provides the business continuity plan to clients at account opening and upon request.

Radius Capital Management Business Continuity Plan

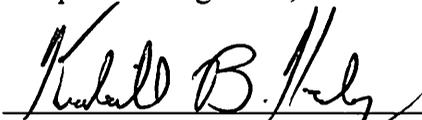
**17. Updates and Annual Review**

Radius will update this plan whenever there is a material change to our operations, structure, business, or location or to those of the Custodian. In addition, Radius will review this BCP annually during the month of July to modify it for any changes in our operations, structure, business or location or those of the Custodian.

**18. Manager Approval**

I have approved this Business Continuity Plan as reasonably designed to enable Radius to meet its obligations to clients in the event of an SBD.

Kimball Halsey  
President of Radius Capital Management, LLC

Signed:   
Date: 25 August 2017

**For more information** – If you have questions about our business continuity planning, you can contact us at 617-661-4200/khalsey@radius-capital.com