

Radius Capital Management, LLC

Succession Plan

Contents

1. Succession Plan Summary	1
2. Business Details.....	1
Business name, website, address and contacts.....	1
Business structure.....	2
Current owner	2
Services.....	2
Custodian	2
3. Succession Details	2
Planned Succession Type	2
Succession Timeframe.....	2
4. Designated Individual details	2
5. Successor Details.....	3
Business name, website, address and contacts.....	3
Business structure.....	3
Current Owners	3
Services.....	3
Custodian	3
6. Customers' Access to Funds and Securities.....	4
7. Succession Timetable.....	4
8. Contingency Management.....	6
9. Disclosure of Business Continuity Plan.....	7
10. Updates and Annual Review	7
11. Manager Approval.....	8

1. SUCCESSION PLAN SUMMARY

In the event that Kimball Halsey, President of Radius Capital Management, LLC (Radius) is temporarily unable to operate Radius as a registered investment advisor due to illness, disability, or family emergency, Sean Whalen, Managing Director at Radius, will take over the day-to-day operations of Radius. If both Kimball Halsey and Sean Whalen are temporarily unable to operate Radius as a registered investment advisor, AssetGrade, LLC (AssetGrade) – a registered investment advisory firm based in Boston, MA – will take over the day-to-day operations of Radius. This includes responding to client inquiries/requests, overseeing client investment accounts, ensuring that Radius remains in compliance with all regulatory authorities, etc. If Kimball Halsey is permanently unable to operate Radius due to illness, disability, or death, Sean Whalen will take over as President of Radius. If both Kimball Halsey and Sean Whalen are permanently unable to operate Radius, AssetGrade will take over all the clients of Radius as a successor. In this event, Radius’ clients will name AssetGrade as an advisor to their accounts and enter into new agreements with AssetGrade for future investment advisory services. AssetGrade will then withdraw Radius’s registration as an investment advisor and Kimball Halsey’s and Sean Whalen’s registration as investment adviser representatives with the Commonwealth of Massachusetts, according to the policies set forth in NASAA Withdrawal from Registration of Investment Advisers and Investment Adviser Representatives Model Rule 204(e)-1.

In either situation involving AssetGrade, a Designated Individual (Mr. Halsey’s wife, Cynthia Tschampl Halsey) will notify AssetGrade to initiate the succession plan.

2. BUSINESS DETAILS

Business name, website, address and contacts

Radius Capital Management, LLC	www.radius-capital.com
Kimball Halsey, President 35 Bedford Court Concord, MA 01742 Tel. 617-661-4200 Fax: 877-877-2880 khalsey@radius-capital.com	Sean Whalen, Managing Director 225 Franklin Street, 26th Floor Boston, MA 02110 Tel. 617-433-8111 Fax: 877-877-2880 swhalen@radius-capital.com

Business structure

Radius Capital Management, LLC (“the Company”) is an Investment Adviser registered with the Commonwealth of Massachusetts.

Current owner

Kimball Halsey

Services

Radius Capital Management provides its clients with asset allocation and investment management services.

Custodian

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

3. SUCCESSION DETAILS

Planned Succession Type

Temporary: Transfer day-to-day operations to another registered investment advisor
Permanent: Full transfer of Radius’ clients to another registered investment advisor.

Succession Timeframe

The succession plan will be implemented within one week after Kimball Halsey becomes unable to operate Radius.

4. DESIGNATED INDIVIDUAL DETAILS

Cynthia Tschampl Halsey, the wife of Kimball Halsey, resides at 35 Bedford Court, Concord MA 01742. Her telephone number is (617) 875-8485.

While Cynthia Tschampl Halsey is not familiar with Radius' business operations, Kimball Halsey has given her detailed instructions on how to temporarily or permanently transfer the day-to-day operations of Radius to AssetMark. She will temporarily have access to confidential client information after the succession plan begins. Mr. Halsey has notified the Radius clients of this possibility and given them the option of not having their confidential information transferred to AssetGrade.

5. SUCCESSOR DETAILS

Business name, website, address and contacts

AssetGrade, LLC
Patrick R. Côté , Founding Partner
One Boston Place
201 Washington Street, Suite 2600
Boston, MA 02108
Phone: (617) 933-7257
Fax: (617) 249-0928
patrick.cote@assetgrade.com
www.assetgrade.com

Business structure

AssetGrade, LLC is an Investment Adviser registered with the Commonwealth of Massachusetts

Current Owners

Patrick R. Côté, CFA
Susan L. Powers, CFA, CPA, CFP

Services

AssetGrade provides its clients with financial planning, investment management, and retirement plan consulting.

Custodian

All client accounts and securities are held at
Fidelity Investments
(same address and phone number as above)

6. CUSTOMERS' ACCESS TO FUNDS AND SECURITIES

Radius does not maintain custody of customers' funds or securities, which are maintained at our custodian, Fidelity Investments. In the event of succession, Radius clients may access their funds and securities through AssetGrade or by contacting Fidelity directly.

7. SUCCESSION TIMETABLE

Phase	Succession action items	Responsible Person / Entity	Timeframe
Notification	Inform AssetGrade of Kimball Halsey's and Sean Whalen's (temporary or permanent) inability to operate Radius Capital Management	Cynthia Tschampl Halsey	Within 3 days
Notification	Notify all clients by phone and email about AssetGrade's <ul style="list-style-type: none"> a) temporary assumption of Radius' day-to-day operations or b) permanent succession as investment advisor for Radius' clients and the dissolution of Radius Capital Management. 	AssetGrade	Within 1 week
Transfer Clients' Information	Transfer all client information to AssetGrade, including electronic (for both temporary and permanent succession) and hard copies (permanent only).	Cynthia Tschampl Halsey and AssetGrade	Within 2 weeks

Radius Capital Management, LLC Succession Plan

Phase	Succession action items	Responsible Person / Entity	Timeframe
Add AssetGrade as an advisor on client accounts	Have clients complete Fidelity Advisor Authorization and Termination Form Section 2. Designation of Authorization (to add AssetGrade) and (only in case of permanent removal of Radius) Section 3. Termination of Authorization	AssetGrade	Within 2 weeks
Withdraw Radius' Registration	– Permanent succession only – File Form ADV-W electronically on the IARD/CRD website to remove Radius as a registered investment advisor.	AssetGrade	Within 2 weeks
Withdrawal Kimball Halsey's and Registration	– Permanent succession only – File Form U-5 electronically on the IARD/CRD website to remove Kimball Halsey as an investment advisor representative	AssetGrade	Within 2 weeks
New contracts	– Permanent succession only – AssetGrade execute new advisory contracts with Radius' clients.	AssetGrade	Within 2 weeks

8. CONTINGENCY MANAGEMENT

Succession risk	Likelihood	Impact	Contingency
AssetGrade withdraws its agreement with Radius to be a successor	Unlikely	Low	Kimball Halsey will choose another registered investment advisor as the successor of Radius.
AssetGrade withdraws its registration as an investment advisor before Radius succession plan begins	Unlikely	Low	Kimball Halsey will choose another registered investment advisor as the successor of Radius.
AssetGrade withdraws its registration as an investment advisor at the same time that the Radius succession plan begins	Highly Unlikely	High	Cynthia Tschampl Halsey or Katherine Halsey Esser is responsible for selecting another company as the successor of Radius.
Cynthia Tschampl Halsey is not capable of notifying AssetGrade to start the succession plan due to illness, disability, or death	Highly Unlikely	High	Clients know that they can access their accounts directly through Fidelity.

Succession risk	Likelihood	Impact	Contingency
One or more of the clients refuse to take AssetGrade as a successor for Radius to continue providing investment adversary services.	Possible	Low	For temporary succession client(s) may access their accounts directly with Fidelity For permanent succession Client requests that Fidelity remove Radius Capital Management as an advisor on the account (i.e, completes Section 3 of the Fidelity Advisor Authorization and Termination form)

9. DISCLOSURE OF BUSINESS CONTINUITY PLAN

Radius provides the business continuity plan to clients at account opening and upon request. Radius also posts the Business Continuity plan on the website.

10. UPDATES AND ANNUAL REVIEW

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

11.MANAGER APPROVAL

I have approved this Radius Succession Plan as reasonably designed to enable Radius to meet its obligations to clients in the event of a succession.

Kimball Halsey, President of Radius Capital Management, LLC

Signed: Kimball B. Halsey
Date: 25 August 2017