

**Radius Capital Management, LLC**

**Succession Plan**

**March 31, 2021**

**Contents**

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

## 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, **Helen Jamieson**, Vice President at Radius, 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, Helen Jamieson, Vice President, will take over as President of Radius.

## 2. BUSINESS DETAILS

### Business name, website, address and contacts

Radius Capital Management, LLC Kimball Halsey, President <a href="mailto:khalsey@radius-capital.com">khalsey@radius-capital.com</a> <a href="http://www.radius-capital.com">www.radius-capital.com</a>	Office Location: 35 Bedford Court Concord, MA 01742 Tel. 617-661-4200, Fax: 877-877-288
---	--

### 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 Helen Jamieson.

Permanent: Full transfer of Radius' ownership to Helen Jamieson.

**Succession Timeframe**

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

**4. DESIGNATED INDIVIDUAL DETAILS**

Helen Jamieson 18 Lakeside Terrace Westford MA 01886 (978) 727-6020	Cynthia Tschampl Halsey 35 Bedford Court Concord MA 01742 (617) 875-8485
--	---

Helen Jamieson is familiar with Radius' business operations, and Kimball Halsey has given her detailed instructions on how to temporarily or permanently manage the day-to-day operations of Radius Capital Management.

## **5. SUCCESSOR DETAILS**

### **Name, address and contacts**

Helen Jamieson, CFA FRM  
18 Lakeside Terrace  
Westford, MA 01886  
Phone: (978) 727-6020  
hjamieson@radius-capital.com

### **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 continue to access their funds and securities through Mrs Jamieson or by contacting Fidelity directly.

## **7. SUCCESSION TIMETABLE**

Within 1 week, Helen Jamieson would notify all clients by phone and email about her:

- a) temporary assumption of Radius' day-to-day operations or
- b) permanent succession as investment advisor for Radius' clients.

## 8. CONTINGENCY MANAGEMENT

<b>Succession risk</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Contingency</b>
Helen Jamieson ceases her employment with Radius prior to implementation of succession plan	Possible	Low	Kimball Halsey will hire another investment advisor representative or choose another registered investment advisor as the successor of Radius.
Helen Jamieson ceases her employment with Radius at the same time that the Radius succession plan begins	Highly Unlikely	High	Cynthia Tschampl Halsey is responsible for notifying all Radius clients and selecting another company as the successor of Radius.
Cynthia Tschampl Halsey and Helen Jamieson are not capable of starting the succession plan due to illness, disability, or death	Highly Unlikely	High	Clients know that they can access their accounts directly through Fidelity.com.
One or more of the clients refuse to take Helen Jamieson as a successor for Radius to continue providing investment advisory services.	Possible	Low	For temporary succession client(s) may access their accounts directly with Fidelity  <b>For permanent succession</b>  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.

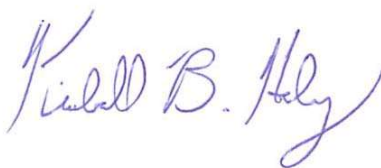
**10. UPDATES AND ANNUAL REVIEW**

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: \_\_\_\_\_

Date: March 31, 2021