



# **Radius Capital Management, LLC**

## **Business Continuity Plan**

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## 1. BUSINESS CONTINUITY 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 will take over as President of Radius. In this event, Helen Jamieson will withdraw Kimball Halsey's registration as an investment adviser representative with the Commonwealth of Massachusetts, according to the policies set forth in NASAA Withdrawal from Registration of Investment Adviser Representatives Model Rule 204(e)-1.

## 2. BUSINESS DETAILS

### Business name, website, address and contacts

Radius Capital Management, LLC 35 Bedford Court Concord, MA 01742	<a href="http://www.radius-capital.com">www.radius-capital.com</a> Tel. 617-661-4200 Fax: 877-877-2880
Kimball Halsey, President <a href="mailto:khalsey@radius-capital.com">khalsey@radius-capital.com</a>	Helen Jamieson, Vice President <a href="mailto:hjamieson@radius-capital.com">hjamieson@radius-capital.com</a>

### 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. BUSINESS CONTINUITY DETAILS**

### **Planned Business Continuity Type**

Temporary: Transfer day-to-day operations to another investment advisor representative at Radius.

Permanent: Full transfer of Radius' management and control to another investment advisor representative at Radius.

### **Business Continuity Timeframe**

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

## **4. 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 either a temporary or permanent transfer of control, Radius clients may access their funds and securities through Radius or by contacting Fidelity directly.

## 5. BUSINESS CONTINUITY TIMETABLE

Phase	Business Continuity action items	Responsible Person / Entity	Timeframe
Notification	Inform Helen Jamieson of Kimball Halsey'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 Helen Jamieson's <ul style="list-style-type: none"> <li>a) temporary assumption of Radius' day-to-day operations</li> <li>or</li> <li>b) permanent transfer of management and control of Radius Capital Management.</li> </ul>	Helen Jamieson	Within 1 week
Withdrawal of Kimball Halsey's Registration	<p>– <b>Permanent Transfer only</b></p> File Form U-5 electronically on the IARD/CRD website to remove Kimball Halsey as an investment advisor representative	Helen Jamieson	Within 2 weeks

## 6. CONTINGENCY MANAGEMENT

<b>Business Continuity risk</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Contingency</b>
Helen Jamieson terminates her employment at Radius Capital Management	Unlikely	High	Kimball Halsey will hire another investment advisor representative to replace Helen Jamieson
At the same time that Kimball Halsey is incapacitated, Helen Jamieson is not capable of implementing the Business Continuity plan due to illness, disability, or death	Highly Unlikely	High	Clients can access their accounts directly through Fidelity.

## 7. 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.

## 8. UPDATES AND ANNUAL REVIEW

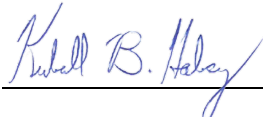
Radius will update this plan whenever we have a material change to our operations, structure, business, or location or to those of the custodian. In addition, Radius will review this Business Continuity plan annually to modify it for any changes in our operations, structure, business, or location or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



## 9. MANAGER APPROVAL

I have approved this Radius Business Continuity Plan as reasonably designed to enable Radius to meet its obligations to clients in the event that I am either temporarily or permanently unable to operate Radius Capital Management.

Kimball Halsey, President of Radius Capital Management, LLC

Signed: 

Date: April 12, 2023