



Business Continuity Plan – Pandemic Mitigation and Airborne Infectious Disease Exposure Prevention Plan Statement

On May 5, 2021 Governor Cuomo signed the New York Health and Essential Rights Act, or "NY HERO Act" (the "Act"), into law. The Act adds workplace health and safety protections for airborne infectious diseases. On September 6, 2021, the Commissioner of Health designated COVID-19 as an airborne infectious disease under the HERO Act. As we continue to monitor the widespread effects of COVID-19, we wanted to ensure employees understand that their safety and well-being is our top priority.

Belle Haven Investments, L.P. ("Belle Haven" or the "Firm") has taken necessary steps to ensure the Firm is in a position to fully service and maintain the critical functions that support business operations throughout the COVID-19 pandemic. The Firm has adopted pandemic mitigation guidance and procedures in addition to the Firm's Business Continuity Plan and Procedure to address the steps the Firm has taken, and will continue to take, in mitigating the potential impact to business operations in response to COVID-19, or any other highly contagious airborne infectious disease, designated as such by the New York State Department of Health. Belle Haven is committed to providing authoritative information about the nature and spread of any such pandemic, including symptoms and signs to monitor for, as well as the required steps to be taken in the event of an illness or outbreak in the office. The health, safety and well-being of Belle Haven's employees and clients are the Firm's top priority.

The purpose of the Airborne Infectious Disease Exposure Prevention Plan (the "Plan") is to protect employees against exposure and disease during an airborne infectious disease outbreak. The Plan will go into effect when an airborne infectious disease is designated by the New York State Commissioner of Health as a highly contagious communicable disease that presents a serious risk of harm to the public health. The plan is subject to additional or greater requirements arising from a declaration of a state of emergency due to an airborne infectious disease, as well as any applicable federal standards.

The plan applies to all employees of Belle Haven, and to the Firm's main office location of 800 Westchester Avenue, Suite N607, Rye Brook, NY 10573. The Firm engages in all business activity at this location. Employees should report any questions or concerns with the implementation the Plan to the Firm's Chief Compliance Officer, or Head of Investor Relations.

BUSINESS CONTINUITY PLAN AND PROCEDURE

The Firm maintains a Business Continuity Plan and Procedure designed to respond to any and all significant business disruptions, addressing how the Firm currently mitigates for both internal and external disruptions by making financial and operational assessments of such potential disruptions, being able to quickly recover and resume business operations, and protect the Firm's books and records. In the event of a pandemic, such as COVID-19, which results in office closure, Belle Haven maintains contingency plans that enable the Firm to continue to provide uninterrupted service. Firm



employees will be instructed to remain at their home residence and operate remotely from that location. Employees have the ability to access both VPN and cloud-based functionality to effectuate necessary business functions. All mission critical systems necessary for the Firm to continue business operations are tested remotely on a regular basis.

RISK BASED FACTORS

Significant business disruptions can vary in their scope, location, business type, and the region affected. This can vary from an internal disruption, such as a network outage or loss of phone service, to external disruptions that take place out of the control of Belle Haven such as a global health pandemic, a terrorist attack, a city flood or other wide-scale regional disruption affecting the operation of the financial markets. Within each of these areas, the severity of the disruption can also vary from minimal to severe. Belle Haven ensures employees maintain full capabilities in accessing mission critical functions via web-based applications, VPN and the cloud-based environment while working remotely. External access to the Firm's network is obtained through enhanced controls that include multi-factor authentication, or risk-based authentication, to protect against unauthorized access to the Firm's internal network from an external source. Testing such controls and processes ensures the Firm is able to continue its business operations to the best of its capabilities.

On an annual basis Belle Haven conducts a risk-based review to ensure that the Firm's contingency plans can be implemented in the event of a significant business disruption, such as the COVID-19 global health pandemic. Belle Haven utilizes a risk-based approach to ensure preparedness by addressing the wide range of possible aspects including, but not limited to:

- Absenteeism;
- Telecommunications and Power Disruptions;
- Remote Work Arrangements; and
- Commuting/Transportation.

WORKPLACE SAFETY MEMBERS

The Firm encourages open communications by employees to raise health and safety concerns, and evaluate the Firm's health and safety efforts and controls, set forth herein. The Chief Compliance Officer and Head of Investor Relations have been designated to monitor and coordinate events around information concerning COVID-19, or other such widespread airborne infectious disease outbreak, as well as to create office procedures that could be implemented to promote safety through infection control. Along with other team members, they assist in the oversight and supervision of workplace safety.

PLANNING APPROACH

The Firm's Occupancy Plan continues to incorporate industry and governmental best practices and recommendations by the New York State Health Department. Should the Governor reinstate any previously issued mandates of the New York on Pause, Belle Haven will comply accordingly. The Firm

will continue to adjust protocols and procedures as more information becomes available. The Centers for Disease Control and Prevention (“CDC”) still considers the coronavirus to be a serious public health threat. It is important that everyone is aware of the disease, and the efforts necessary to prevent its spread and maintain a healthy work environment.

A pandemic occurs when there is a widespread infectious disease outbreak. While a pandemic may vary in severity and duration, in accordance with industry best practices, Belle Haven has implemented many strategic actions as part of its Business Continuity Plan and Procedure. The Firm has implemented and may require the following controls to be enforced during an airborne infectious disease outbreak, as deemed necessary, including, but not limited to:

- Daily health screenings;
- Increased remote work capabilities;
- Enhanced use of remote meeting and conference call capabilities;
- Implementation of social distancing;
- The requirement of appropriate face coverings, regardless of vaccination status;
- Distribution of hand sanitizers, masks, gloves and hygiene products;
- Increased sanitizing and disinfecting of facilities;
- Partitions have been installed between work stations;
- Touchless temperature screening upon entry into the office;
- Air filters throughout the office;
- Onsite COVID-19 testing;
- Increased use of communication channels to disseminate important health and safety information, including protocols for illness or high-risk personnel; and
- Implementation of travel restrictions and quarantines based on federal, state, local and CDC recommendations.

PREVENTION

The best way to prevent illness is to avoid being exposed to the virus. As per the CDC and New York State Department of Health (“NYSDOH”), the Firm has implemented the below best practices in order to maintain a safe working environment for all.

- Maintain social distancing - avoid close contact; keep six (6) feet distance or more where possible.
- Wear a face covering over your mouth and nose when in public areas.
- Wash hands frequently with soap for at least twenty (20) seconds; avoid touching your face; cover your cough and sneeze with a tissue.
- Limit congestion in paths of travel and areas of close quarters, where occupancy should be limited, or in poorly ventilated spaces.
- Monitor your health daily and practice good hygiene.

- Clean and disinfect frequently touched surfaces such as workstations, keyboards, telephones, handrails, and doorknobs.
- Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. Clean and disinfect them before and after use.
- Get vaccinated.

Belle Haven will ensure a clean workplace, including the regular cleaning of objects and areas that are frequently used, such as the kitchen area, conference rooms, door handles and computer equipment.

EXPOSURE CONTROL READINESS, MAINTENANCE AND STORAGE

The controls outlined herein will be properly stored, and maintained so that they are ready for immediate use in the event of an infectious disease outbreak. The Plan will be revised accordingly in order to keep up to date with current requirements set forth by New York State. Belle Haven will not discriminate, retaliate against, or take adverse action against any employee for exercising their rights under this Plan, including reporting conduct the employee reasonably believes in good faith violates the Plan and imposes an unreasonable risk of workplace exposure.

The implementation of this Plan, additional training concerning the circumstances it can be activated, additional policies and procedure in response to such activation, and employee rights under the HERO Act will be communicated to all employees by the Firm's Chief Compliance Officer, or Head of Investor Relations.

ADDITIONAL INFORMATION

- Center for Disease Control: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html>
- World Health Organization: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019>
- New York State Department of Health: <https://health.ny.gov/>
- New York Department of Labor: <https://dol.ny.gov/ny-hero-act>

Belle Haven is firmly committed to maintaining the health, safety, and well-being of all employees and clients. The Firm is deeply focused on ensuring readiness, accountability and delivering best practices that health experts and local and state officials require. As this is a new experience for all, the Firm will need to continue adjusting protocols and procedures as new information and guidance is released. Belle Haven continues to remain confident in its ability to remain responsive to the needs of employees and clients throughout any shutdowns or quarantines that may be required.