



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

Belle Haven Investments, L.P. (“Belle Haven” or the “Firm”) has implemented measures to ensure continuity of critical business functions in the event of a global pandemic, such as COVID-19, or any other highly contagious airborne infectious disease. The Firm has established a Pandemic Mitigation and Airborne Infectious Disease Prevention Guidance and Procedures framework, in addition to its comprehensive Business Continuity Plan, which outlines the steps taken and ongoing efforts to mitigate potential impacts to business operations. This framework addresses responses to airborne infectious diseases, designated as highly contagious by the New York State Department of Health. Belle Haven remains committed to providing reliable, up-to-date information on the nature and transmission of such diseases, including symptoms, preventive actions, and necessary steps in the event of illness or an outbreak in the workplace. The health, safety, and well-being of both employees and clients are the Firm’s highest priority.

The purpose of the Pandemic Mitigation and Airborne Infectious Disease Exposure Prevention Plan (the “Plan”) is to safeguard employees from exposure during an airborne infectious disease outbreak. The Plan is activated when an airborne infectious disease is designated by the New York State Commissioner of Health as a highly contagious communicable disease that poses a significant risk to public health. The Plan may also be subject to further measures should a state of emergency be declared due to an airborne infectious disease, in addition to any relevant federal guidelines.

The Plan applies to all employees of Belle Haven and covers the Firm’s primary office located at 800 Westchester Avenue, Suite N607, Rye Brook, NY 10573, where all business activities are conducted. Employees are encouraged to direct any questions or concerns regarding the implementation of the Plan to the Firm’s Chief Compliance Officer (“CCO”) or Chief Operating Officer (“COO”).

### BUSINESS CONTINUITY PLAN AND PROCEDURE

The Firm has developed a Business Continuity Plan and Procedure (“BCP”) to define how the Firm will respond to events that could significantly disrupt its business operations. Given the unpredictable nature of the timing and impact of catastrophes, pandemics, and other significant business disruptions, the Firm remains adaptable in its approach to handling such events.

The Firm’s BCP is structured to ensure that business operations can resume as quickly as possible, given the scale and severity of any disruption. The BCP outlines the Firm’s protocols for mitigating both internal and external disruptions, including data backup and recovery procedures, financial and operational assessments, identification of mission-critical systems, and alternative communication channels for clients, employees, and regulators. The BCP also provides contingency measures for relocating employees in the event of an office closure, while ensuring clients can promptly access their funds and securities should the Firm be unable to continue critical business operations.



### RISK BASED FACTORS

Significant business disruptions may vary in scope, location, and severity. These disruptions can range from internal issues, such as network outages, to external events beyond the Firm's control, such as global health pandemics, natural disasters, or terrorist attacks. The severity of these disruptions may range from minor to catastrophic. Belle Haven ensures that employees retain full access to mission-critical functions through web-based applications, VPN, and cloud infrastructure (virtual machines) while working remotely. Access to the Firm's network is safeguarded with enhanced security protocols, including multi-factor or risk-based authentication, to prevent unauthorized access.

### WORKPLACE SAFETY MEMBERS

Belle Haven fosters an environment of open communication, encouraging employees to raise concerns related to health and safety, and to evaluate the effectiveness of the Firm's mitigation efforts. The CCO and COO are responsible for monitoring developments regarding COVID-19, or any similar airborne infectious disease outbreak. They collaborate with other team members to implement necessary workplace safety protocols and infection control procedures.

### PLANNING APPROACH

Belle Haven's Occupancy Plan adheres to best practices as recommended by industry guidelines and the New York State Department of Health. The Firm will adjust protocols and procedures in accordance with any state or federal mandates.

A pandemic, defined as a widespread infectious disease outbreak, can vary in severity and duration. As part of its Business Continuity Plan, Belle Haven has proactively implemented several strategic actions, including:

- Daily health screenings
- Increased remote work capabilities
- Enhanced use of remote meeting and conference call technology
- Implementation of social distancing measures
- Requirement for face coverings, regardless of vaccination status
- Distribution of hand sanitizers, masks, gloves, and hygiene products
- Increased cleaning and disinfecting of facilities
- Installation of partitions between workstations
- Touchless temperature screening upon office entry
- Use of air filters throughout the office
- Onsite COVID-19 testing
- Expanded communication channels to disseminate health and safety information
- Enforced travel restrictions and quarantines based on federal, state, local, and CDC guidelines

### PROTECTING YOURSELF AND OTHERS - SYMPTOMS

Employees must adhere to proper respiratory hygiene practices and stay home if they are experiencing symptoms of acute respiratory illness. Employees should remain at home until they are



symptom-free for at least twenty-four (24) hours without the use of fever-reducing or other symptom-altering medications. Symptoms of concern include, but are not limited to:

- Fever or chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea
- Sore throat
- New loss of taste or smell

Employees exhibiting symptoms should contact the Firm's designated representatives within six (6) hours of exposure to an airborne infectious disease.

#### OFFICE EXPOSURE

In the event of suspected exposure to an airborne infectious disease within the office, the following measures will be enacted:

- Notify all employees of the potential exposure
- Instruct exposed individuals to remain home and work remotely for a specified period
- Conduct a deep cleaning and sanitation of the office
- Review and communicate updated safety and disinfection protocols
- Provide ongoing updates regarding employee well-being, contact tracing, and office status
- Communicate return-to-work procedures and any additional safety measures in place

#### EXPOSURE CONTROL READINESS, MAINTENANCE AND STORAGE

The Firm ensures that all controls, including PPE and sanitizing materials, are properly stored and maintained to facilitate rapid deployment during an airborne infectious disease outbreak. The Plan will be regularly updated to comply with the latest requirements from New York State and other regulatory bodies. Belle Haven prohibits discrimination, retaliation, or adverse actions against any employee who exercises their rights under this Plan, including reporting potential violations that may present a health risk.

#### SUMMARY

Belle Haven is committed to maintaining the health, safety, and well-being of its employees and clients. The Firm's CCO or COO will communicate the implementation of this Plan, including employee rights, activation circumstances, and any additional policies or procedures required. Belle Haven remains dedicated to adhering to best practices, industry standards, and local and state guidelines,



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and will adjust protocols as necessary to ensure business continuity during any airborne infectious disease outbreak.

**FOR MORE INFORMATION**

For questions about our Pandemic Mitigation and Airborne Infectious Disease Exposure Prevention Plan please contact us at (914) 816-4633 or [compliance@bellehaven.com](mailto:compliance@bellehaven.com).