



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

Belle Haven Investments, L.P. (“Belle Haven” or the “Firm”) has taken necessary steps to ensure the Firm is able to fully service and maintain the critical functions that support business operations in the event of a global pandemic, such as COVID-19. The Firm has adopted Pandemic Mitigation and Airborne Infectious Disease Prevention 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 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 Pandemic Mitigation and Airborne Infectious Disease Exposure Prevention Plan (the “Plan”) is to protect employees against exposure in the event of an airborne infectious disease outbreak. The Plan will go into effect when an airborne infectious disease, as 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, has been declared. The Plan is subject to additional requirements should there be a declaration of a state of emergency due to an airborne infectious disease, as well as any applicable federal standards imposed.

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 about 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 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 global 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 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 in a 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.

### 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 CCO and COO 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 incorporates industry and governmental best practices and recommendations by the New York State Health Department. The Firm will adjust protocols and procedures in accordance with any state or federal mandates.

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 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.

### PROTECTING YOURSELF AND OTHERS - SYMPTOMS

It is important that all employees practice good respiratory hygiene. Employees who have symptoms of an acute respiratory illness are recommended to stay home and not come to work until they are free of fever (100.4°F or greater using an oral thermometer), signs of a fever, and any other symptoms listed below for at least 24 hours, without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). People with acute respiratory illness report a wide range of symptoms – ranging from mild symptoms to severe illness. Such symptoms 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; or
- New loss of taste or smell.

Many times, with the best of intentions, employees report to work even though they feel ill. During an airborne infectious disease outbreak, such as the COVID-19 virus, it is critical that employees do not report to work while they are ill and/or experiencing any of the symptoms noted above.

Employees should contact the Firm's designated individuals within six (6) hours of notification of any such exposure to an airborne infectious disease to discuss their specific situation.

### OFFICE EXPOSURE

The following procedures below will be enforced should the Firm determine that employees may have been exposed in the event of an airborne infectious disease outbreak. Such procedures may include, but are not limited to:

- Communicate to all employees of the workplace exposure;
- Instruct all identified directly exposed individuals to stay home and work remotely for a prescribed period of time.
- Schedule a deep cleaning and sanitation of the office.



- Detail any new workplace safety and disinfection protocols that will be implemented.
- Communicate up-to-date information concerning the well-being of employees, contact tracing and any office closures, as applicable.
- Communicate return-to-work timetables, safety protections in place, and other initiatives the Firm implemented to support employees.

#### 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 airborne 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.

#### SUMMARY

The implementation of this Plan, training concerning the circumstances in which it can be activated, additional policies and procedure in response to such activation, and employee rights will be communicated to all employees by the Firm's CCO or COO. 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. In the event on an airborne infectious disease outbreak, the Firm will adjust protocols and procedures in accordance with information and guidance released. Belle Haven is confident in its ability to remain responsive to the needs of employees and clients throughout any such state or federal mandated shutdowns or quarantines that may be enforced.

#### FOR MORE INFORMATION

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