



Business Continuity Plan – Pandemic Statement of Preparation

As we continue to closely monitor the widespread effects of COVID-19, Belle Haven Investments, L.P. (“Belle Haven” or the “Firm”) have taken necessary steps to ensure the Firm is in a position to fully service and maintain the critical functions that support business operations. 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 such other highly contagious 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 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 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.

PLANNING APPROACH

The Firm's Re-Occupancy Plan continues to incorporate industry and governmental best practices and recommendations by the New York State Health Department. Should the Governor reinstate any 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 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 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;
- 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.

PROTECTING YOURSELF AND OTHERS - SYMPTOMS

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. The Chief Compliance Officer ("CCO") and Head of Investor Relations ("Head of IR") have been designated to monitor and coordinate events around information concerning COVID-19, or other such

widespread disease outbreak, as well as to create office procedures that could be implemented to promote safety through infection control.

COVID-19 is a respiratory virus which spreads primarily through contact with an infected person through respiratory droplets generated when a person, for example, coughs or sneezes, or through droplets of saliva or discharge from the nose. The virus that causes COVID-19 is spreading very easily and sustainably between people. Information from the ongoing COVID-19 pandemic suggests that this virus is spreading more efficiently than influenza, but not as efficiently as measles, which is highly contagious. In general, the more closely a person interacts with others and the longer that interaction, the higher the risk of COVID-19 spread.

It is important that everyone practice good respiratory hygiene. Employees who have symptoms of 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 COVID-19 have had a wide range of symptoms reported that may appear 2-14 days after an initial exposure to the virus. 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.

Should an employee test positive for COVID-19, experience symptoms consistent with COVID-19, or have been in close contact with someone who has tested positive for the virus, they will be instructed to remain at home and quarantine for a period of up to fourteen (14) days. Employees should contact the Firm's designated individuals within six (6) hours of notification of such exposure.

"Close Contact" is further defined to include:

- You were within six (6) feet of someone who has COVID-19 for a total of fifteen (15) minutes or more over a 24-hour period.
- You provided care at home to someone who is sick with COVID-19.
- You had direct physical contact with the person (hugged or kissed them).

- You shared eating or drinking utensils.
- They sneezed, coughed, or somehow got respiratory droplets on you.

PREVENTION

The best way to prevent illness is to avoid being exposed to the virus. As per the CDC and World Health Organization, 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 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.

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/>

Belle Haven is firmly committed to maintaining the health, safety, and well-being of our employees and clients. We are 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 of us, we will need to continue adjusting protocols and procedures as we learn more. Belle Haven continues to remain confident in its ability to remain responsive to the needs of employees and clients throughout any additional shutdowns or quarantines that may be required.