



Belle Haven Investments, L.P. - Business Continuity Disclosure Statement

Belle Haven Investments, L.P. (“Belle Haven”, or the “Firm”) has developed a Business Continuity Plan and Procedure (“BCP”) to define how it plans to respond to events that could significantly disrupt business operations. Since the timing and impact of catastrophes, pandemics or other significant business disruptions are unpredictable, the Firm remains flexible in responding to actual events as they occur. With that in mind, the Firm discloses the Business Continuity Plan and objective below.

CONTACTING BELLE HAVEN

If after a significant business disruption, you are unable to contact Belle Haven using the main telephone number of (914) 816-4633, you are advised to call the Firm’s alternative number of (914) 816-4622. If you are unable to access the Firm through either of those means, you are advised to contact the Firm’s clearing firm, Pershing, LLC (“Pershing”), directly at (201) 413-2000, or access their website, www.pershing.com, or contact the custodian where your account is held for instructions on prompt access to funds and securities, or other account related inquiries. For accounts held at Pershing, the specific procedures and requirements for trade related transactions, cash disbursements and security transfers are listed on Pershing’s website under Business Continuity & Other Disclosures.

BELLE HAVEN’S BUSINESS CONTINUITY PLAN

The goal of Belle Haven’s Business Continuity Plan and Procedure (“BCP”) is to respond to any and all significant business disruptions by safeguarding employees’ lives and the Firm’s property, while maintaining the ability to conduct business to the best of our capability. This is accomplished by making a financial and operational assessment of such business disruption, quickly recovering and resuming operations, and protecting the Firm’s book and records. The Firm’s Business Continuity Plan and Procedure is designed to enable the Firm to resume business operations as quickly as possible, given the scope and severity of the disruption to business operations.

The Firm’s BCP addresses how it currently mitigates for both internal and external significant business disruptions by outlining data backup and recovery procedures; listing financial and operational assessment objectives; identifying mission critical systems; providing alternative means of communication with clients, Firm employees, and regulators; providing an alternate physical location plan for Firm employees in the event of an office closure; and ensuring clients prompt access to their funds and securities in the event the Firm is unable to continue critical business operations. While every emergency situation poses its own unique challenges based on internal and/or external factors, such as time of day and the severity of the disruption, for accounts held at Pershing, Pershing’s Critical Business Service recovery time objective for all business resumption, including those involving a relocation of personnel or technology, is four (4) hours or less, depending upon the availability of external resources. Pershing’s objective is to restore their operations, be able to complete existing transactions, and accept new transactions and payments within a four (4) hour time period. Orders



and requests for funds and securities could be delayed during this period. For clients with accounts not held at Pershing, you are advised to contact the custodian where their account is held for information regarding their specific Business Continuity Plan.

Additionally, the Firm has adopted Pandemic Mitigation Guidance and Procedures in addition to the Firm's BCP to address the steps the Firm has taken in mitigating the potential impact to business operations in response to a widespread disease outbreak, such as COVID-19. The health, safety and well-being of Belle Haven's employees and clients are the Firm's top priority. 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 workplace.

VARYING DISRUPTIONS

Belle Haven is located at 800 Westchester Avenue, Suite N607, Rye Brook, NY 10573. The Firm's main telephone number is (914) 816-4633.

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 wide-spread health pandemic, a terrorist attack, a city flood or other large-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. In the event of a disruption that is only affecting Belle Haven, the Firm will transfer its business operations to a local site, if needed, and expect to recover and resume business within four (4) hours. In the event a disruption is affecting the Firm's location, city, or region, the Firm will transfer operations to a site outside of the affected area, and recover and resume business within four (4) hours. In either situation, the Firm intends to continue its business operations to the best of its capabilities. If deemed necessary, the Firm will transfer limited business operations to its clearing firm, Pershing, and communicate with clients by all means available during such time for additional information on the Firm's business operating procedures. Such communication means include, but are not limited to, accessing the Firm's website, www.bellehaven.com, or utilizing the Firm's alternative telephone number, (914) 816-4622. If there is significant business disruption that is so severe that it prevents the Firm from continuing business operations, Belle Haven will ensure clients prompt access to their funds and securities.

SUMMARY

On an annual basis, the Firm's Business Continuity Plan and Procedure is reviewed and tested to ensure that it can be implemented in the event of a significant business disruption. Such testing is used to validate the Firm's incident response capabilities of mitigating real-world events having the potential to disrupt business operations. Belle Haven is confident that it will continue to be responsive to all client needs throughout any potential disruption to normal business operations.