

HARTREE SUPPLIER CODE OF CONDUCT

ABOUT THIS CODE

Corporate integrity, responsible sourcing and the safety and wellbeing of workers in the countries where we do business are of paramount importance to Hartree Partners LP and its subsidiaries (**Hartree**). These core principles are reflected in this Supplier Code of Conduct (**Code**), which provides a comprehensive set of expectations of any entity that supplies products or services to Hartree. These expectations are not replacements or substitutes for applicable laws, nor do they amend contracted obligations.

Hartree's approach to corporate responsibility is set out in its Code of Conduct and Environmental Social Governance Policy. We seek to develop and strengthen relationships with suppliers who are committed to and act in accordance with the principals set out in each. Hartree believes that all business counterparties should adopt comparable standards and, at a minimum, comply with the international and host country laws and regulations applicable to each counterparty.

DEFINITIONS AND SCOPE

In this Code:

Supplier means a company, partnership or individual that provides goods or services to Hartree.

worker means any individual whom the Supplier employs, hires or engages, or otherwise uses to conduct its business.

Representative means the Supplier's suppliers, vendors, agents, and subcontractors who are involved in Hartree's supply chain.

WHO MUST COMPLY WITH THIS CODE?

By acceptance of this Code, the Supplier agrees to comply with the Code and shall ensure that its employees, suppliers and business partners who may provide goods or services to Hartree are aware of this Code and act in accordance with it.

1. Compliance with laws and regulations

1.1 In carrying out its agreement(s) with Hartree, the Supplier shall support the values and commitments set out in the Hartree Partner's Code of Conduct, which is available at <https://www.hartreepartners.com/documents/>.

1.2 The Supplier shall, in addition to complying with the standards set out in this Code, comply with all relevant applicable laws and regulations that govern their operations, business, industry, trade and personnel, and respect contractual obligations (and if applicable, the laws and regulations of any other

jurisdiction where it or its Representatives operate) including but not limited to the laws and regulations relating to issues addressed in this Code.

2. Updating this Code

Hartree has the right to modify this Code from time to time, with or with our notice, as determined in its sole discretion.

3. Workforce issues

3.1 Slavery, human trafficking and child labor. The Supplier shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes such as the Modern Slavery Act 2015, or equivalent country legislation in any part of its supply chain. This includes, but is not limited to, not supporting or engaging or requiring any forced labor, the use of child labor, bonded labor, indentured labour and prison labour.

3.2 Human rights. The Supplier shall respect the conventions and principles of all internationally recognised human rights understood, at a minimum, as those expressed in the UN Guiding Principles on Business and Human Rights.

3.3 Equal opportunities. Hartree is an equal opportunities employer and is committed to providing a work environment that is free from all forms of discrimination, harassment, and violence. Suppliers shall maintain an inclusive work environment that avoids any form of discrimination; and shall ensure that all forms of harassment, including sexual harassment, intimidation, and abuse or threat are not permitted.

3.4 Employee concerns. Suppliers shall have mechanisms to allow workers to speak up or raise grievances without fear of retaliation.

3.5 Freedom of association and collective bargaining. The Supplier shall respect the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining ;unless prevented by local applicable laws.

3.6 Working environment. The Supplier shall provide a safe, healthy, and sanitary working environment and comply with health and safety laws and any other relevant laws where it operates. This includes, but is not limited to, implementing general and relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries.

4. Environmental responsibility

4.1 The Supplier shall ensure that its operations comply with all relevant applicable environmental laws and regulations, including laws and international treaties.

4.2 The Supplier shall have in place a suitable environmental management system for managing its environmental risks.

5. Bribery and corruption

5.1 The Supplier shall comply with all applicable laws, statutes and regulations relating to the prevention of bribery and corruption such as the Foreign Corrupt Practices Act and UK Bribery Act 2010 or equivalent country legislation. To that end, the Supplier shall not accept, offer, promise, pay, permit, or authorise:

- (a) bribes, facilitation payments, kickbacks or illegal political contributions;
- (b) money, goods, services, entertainment, employment, contracts, or other things of value, in order to obtain or retain an improper advantage; or
- (c) any other unlawful or improper payments or benefits.

6. Unfair business practices

The Supplier shall comply with all applicable competition laws, including but not limited to those relating to collaborating and sharing information with competitors, price fixing and rigging bids.

7. Procuring and managing Representatives

7.1 With regard to prospective Representatives, the Supplier shall carry out appropriate due diligence on prospective Representatives that will form part of Hartree's upstream supply chain. At a minimum, the due diligence must include the prospective Representative's ability to meet the requirements and principles that are covered in this Code.

7.2 In its dealings with Representatives, the Supplier shall ensure that agreements with Representatives include provisions that require the Representatives to comply with applicable provisions of this Code, having due regard to the risk profile of the transaction, the Representative's ability to comply with those provisions and the consequences where the Representative fails to meet those requirements.

8. Self-monitoring and reporting breaches

8.1 The Supplier shall monitor its compliance with the Code and shall report any material issues arising from adhering to this Code as soon as possible to: <https://www.hartreepartners.com/ethics-hotline/>.

8.2 Where Hartree becomes aware of any issues related to Code by the Supplier or its workers, particularly with regard to respect for human rights, child labor, forced and compulsory labor, and health and safety Hartree may contact the Supplier to understand the nature of the issue and any remediation plans, if applicable.

8.3 The Supplier shall not retaliate or take disciplinary action against any worker that has, in good faith, reported breaches of this Code or questionable behaviour, or who has sought advice regarding this Code.

9. Version control

Code version	Date of revision and publication
1.0	June 26, 2023
2.0	August 29, 2023

Schedule 1 Supplier Declaration

As required by Hartree's Supplier Code of Conduct (**Code**), please select one of the following options a) or b) and sign and date below:

We, the undersigned Supplier hereby confirm:

_____ a) that we will act in accordance with the expectations in this Code.

or:

_____ b) that the Supplier's own code of conduct with which it must comply, is consistent with this Code.

Signed by:

Signed:

[NAME OF SIGNATORY] on behalf of [SUPPLIER]

Date:

Please send a copy of this executed certificate to compliance@hartreepartners.com