

## **Modern Slavery Statement pursuant to section 54(1) of the Modern Slavery Act 2015 in respect of Hartree Partners Power & Gas Company (UK) Limited**

This statement relates to the financial year ending 31 December 2022 and is made pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps that Hartree Partners Power & Gas Company (UK) Limited (“HPPG”) has taken to manage the risks of modern slavery occurring in its business and supply chains. It further sets out the additional steps that it intends to take over the coming year. HPPG is committed to acting with integrity when conducting its business and to improving its practices to prevent slavery and human trafficking.

### **Organisation's structure**

HPPG is part of a global energy and commodities trading business. The current jurisdictional remit of HPPG is primarily limited to the UK and Europe. Its ultimate parent undertaking is Hartree Partners L.P. (“Hartree”), a limited partnership duly formed in the State of Delaware, United States of America and it is a part of the Hartree group of companies (the “Group”). The Group has around 866 employees worldwide (excluding the Sprague group of companies) and operates primarily in the United States of America, the United Kingdom, Singapore, Switzerland, Germany, Norway South Africa, Australia, Dubai, China, Mexico and South America.

### **Our business**

HPPG and its subsidiaries engage in proprietary trading in natural gas, electricity, emissions, and related derivatives; engage in trading as principal in currency and currency derivatives; and carry on the business of suppliers, distributors and dealers of natural gas, electricity, and emissions. From time to time, HPPG also trades in physical metals, agricultural, oil and refined products. HPPG does not have any employees.

### **Our supply chains**

Our supply chains primarily involve sourcing the commodities set out above from trading counterparties. Although HPPG will be purchasing limited volumes of physical metals, agricultural, oil and refined products from time to time, these are not purchased at source or in high-risk jurisdictions but from trading counterparties. We recognise that there may be human rights related risks associated with the purchase of physical metals and, as a result, we continue to identify next steps, as set out below, to mitigate such risks.

### **Our policies on slavery and human trafficking**

The Group is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. As we continue to transition from a small boutique trading house to a larger company, we continue to review our practices in this area as part of a broader and more holistic plan to look at the entirety of our corporate compliance programme. This holistic review resulted, during 2022, in the implementation of a global Hartree Code of Conduct which applies to employees working in

the Group, including HPPG, in addition to the implementation of an Environmental Social Governance Policy. During 2023, we will consider the need to implement a responsible sourcing policy which reflects our zero tolerance to slavery and human trafficking as well as supplier code of conduct and supplier due diligence questionnaire. The Group holds a strong commitment to acting ethically and with integrity in all its commercial relationships and as our business and footprint continue to expand, as part of that commitment, it will work towards implementing and enforcing effective systems and controls that ensure slavery and human trafficking is not taking place anywhere in its supply chains.

### **Due diligence processes for slavery and human trafficking**

The Group conducts due diligence on all its counterparties prior to entering into any business relationship with them. Depending on the risk profile of a counterparty, a varying level of due diligence will be conducted. The risk profile will be determined by a number of factors, including the type of counterparty, nature of their business, the type of relationship we are entering into and the jurisdiction within which they operate. These know your counterparty (“KYC”) checks also comprise screening for risks such as trade sanctions, money laundering and bribery infringements. This screening is undertaken on a regular basis and any issues of concern are escalated within the Group. It also comprises identification and review of adverse media reports and as such will highlight any issues with human rights that may be in the public domain with respect to a counterparty. We will continue to refine these processes and look at incorporating human rights and modern slavery into the risk assessment of our counterparties in a more systematised way.

### **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. HPPG does not have a large supply chain nor a separate procurement function.

### **Training**

Our intention as a Group is to provide relevant training to higher risk staff as appropriate. This training will need to be developed in conjunction with the review of the Group compliance programme. As our business evolves, we will continue to assess the need and relevant audience for training in this area since the target audience may need to expand as our business grows and our compliance programme matures. Such training will not apply to HPPG as it has no employees.

### **Our effectiveness in combating slavery and human trafficking**

As the Group builds out its corporate compliance programme, it will put in place a set of key performance indicators (“KPIs”) that will give it insight not only into the performance of our organisation but also the effectiveness of our compliance with the Modern Slavery Act. Although it has yet to undertake this work, it is anticipated that some of the KPIs would include statistics relating to modern slavery and human rights training and other ethical training in addition to the selection of potential suppliers, which we believe to be higher risk from a slavery and human rights perspective.

## **Next steps**

We anticipate taking the following steps as a Group to further combat slavery and human trafficking which will impact HPPG:

- Continue with a holistic review of the Group's compliance programme;
- Implement, during 2023, a global telephone and web reporting mechanism available to both employees and third parties to facilitate the reporting of modern slavery issues with respect to the Group including HPPG and its subsidiaries;
- Initiate a more detailed risk mapping exercise of any risks that HPPG and its subsidiaries has in the slavery and human trafficking area in any of its supply chains;
- Consider the implementation of a Supplier Code of Conduct which will include principles with which we will expect our suppliers to comply;
- Consider the implementation of a supplier due diligence questionnaire to be completed during the onboarding process; and
- Embed into our KYC processes the additional risks inherent in the human rights area.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022. It was approved by the board of HPPG on 6 March 2024.

**Jonathan O'Neill**

For and on behalf of Hartree Partners Power & Gas Company (UK) Limited

Date: 7 March 2024