

Hartree Metals Sàrl (Hartree Metals LLC)

Supply Chain Policy on Child Labour

Hartree Metals Sàrl (Hartree Metals LLC) is a private, limited company incorporated in Switzerland and is part of the Hartree Partners, L.P. (“**Hartree**”) global energy and commodities trading business.

Hartree Metals Sàrl, together with its subsidiaries (“**HMS**”), engages in proprietary trading in metal concentrates and semi-refined metal and mineral products (individually, each a “**Product**” and collectively, “**Products**”) and carries on the business of suppliers, distributors and dealers of such Products on a global basis. HMS is committed to acting with integrity when conducting its business and to improving its practices to prevent child labour in its supply chains.

This Supply Chain Policy on Child Labour (“**Policy**”) applies to HMS’ sourcing of the Products. This Policy is based on the requirements of the Swiss *Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO)*.

HMS aligns itself with the principles-based approach to doing business outlined in the Ten Principles of the UN Global Compact: Human Rights, Labor, and Environment and Anti-Corruption¹. These principles assist HMS in managing its risk in the markets, activities and jurisdictions in which it operates.

HMS’ commitment to children’s rights and supply chain risk assessment is guided by the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct² and the International Labour Organization (ILO) Conventions 138 (Minimum Age) and 182 (Worst Form of Child Labour)³.

Our Commitment

HMS is committed to continuously striving towards the prevention, remediation, and the elimination of child labor in its supply chains and will suspend business with counterparties or service providers we have identified as using child labour in their supply chain. This commitment is reflected in HMS’ Supplier Code of Conduct and the systems and controls used to identify the risks of child labour in its supply chains. To minimize the risk of child labour in its supply chains, HMS endeavors to:

- Conduct business with high ethical and social responsibility standards, reflecting a core culture of integrity, fairness and ethics;
- Ensure that its business activities are conducted in compliance with health, safety and environmental regulations;
- Do business with likeminded business partners who share a commitment to integrity in business dealing; and
- Raise internal awareness and increase capabilities around identification and management of potential child labour risks.

¹ <https://unglobalcompact.org/what-is-gc/mission/principles>

² <https://www.oecd.org/investment/duo-diligence-guidance-for-responsible-business-conduct.htm>

³ [ILO Conventions 138 & 182](#)

Prohibited Child Labor

HMS supports the minimum working ages and child labour prohibitions set out below:

ILO Convention No. 138

ILO Convention No. 138 establishes fifteen years as the minimum age for work in general and requires that the age at which a child leaves compulsory education align with the minimum age for work. The convention sets eighteen as the minimum age for hazardous work, which is defined as work that, due to its nature or the circumstances in which it is carried out, is likely to jeopardize children's health, safety or morals. Work that is mentally or morally dangerous and harmful to children and/or interferes with their schooling can occur by either (i) depriving them of the opportunity to attend school; (ii) obliging them to leave school prematurely; or (iii) requiring them to attempt to combine school attendance with excessively long and heavy work.

ILO Convention No. 182

Additionally, HMS has zero tolerance for activities outlined in ILO Convention No. 182, which prohibits the worst forms of child labor as follows:

1. All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
2. The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
3. The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; and,
4. Work which, by its nature or the circumstances in which it is conducted, is likely to harm the health, safety or morals of children.

Risk Management

HMS' child labour risk management structure consists of the following components: (i) know your trading counterparty ("KYC") reviews; (ii) supplier expectations via the Supplier Code of Conduct; (iii) a child labour risk assessment; and (iv) a grievance mechanism.

HMS conducts desktop due diligence on the country in which the Product is sourced from its Product suppliers to assess the risk of child labour in its supply chains. Where either the trading counterparty or Product profile carries a higher risk of child labour, enhanced due diligence will be conducted. Enhanced due diligence may include the following actions: (a) reviewing information, in particular from internet searches of news articles, legal proceedings, and other publicly posted activities in which the trading counterparty or mine owner is involved; (b) obtaining assurances from trading counterparties; (c) consulting with experts and/or specialist literature; (d) carrying out on-site checks; and (e) utilizing, if available, recognized standards and/or certification systems.

Another component of HMS' child labour risk management is the Hartree Ethics Hotline⁴ - an anonymous, secure, web and telephone-based service delivered by an independent, third party. The service is available twenty-four hours a day, seven days a week. Through the Ethics Hotline, concerns pertaining to child-labour

⁴ <https://www.hartreepartners.com/ethics-hotline/>

within HMS' supply chains can be reported by suppliers, business partners, employees and others. HMS and Hartree will take all reports made through this system seriously.

Reporting

HMS communicates publicly on the key aspects of its responsible supply chain framework in its annual DDTrO report and through this Policy. Through the DDTrO report, HMS describes its risk management process related to child labour risks in its supply chain.

HMS reserves the right to revise or amend this Policy as necessary to ensure its ongoing effectiveness and alignment with legal and regulatory requirements as well as HMS' business activities.

Approval Date: 28 June 2024