

Modern Slavery Statement pursuant to section 54(1) of the Modern Slavery Act 2015

Joint Statement 2023

This statement relates to the financial year ending 31 December 2023 and is made pursuant to the UK Modern Slavery Act 2015 (“**Act**”).

This is a joint statement made on behalf of the following reporting entities under the Act: Hartree Partners, LP (“**HPLP**”) and two UK operating subsidiaries Hartree Partners (UK) Limited (“**HPUK**”) and Hartree Partners Power & Gas Company (UK) Limited (“**HPPG**”). The information provided below generally applies to HPLP, HPUK and HPPG as these entities have the same policies, which are issued by HPLP.

This statement sets out the steps that Hartree¹ has taken to manage the risks of modern slavery, including forced labour, child labour, human trafficking, servitude and slavery (“**Modern Slavery**”) occurring in our business and in our supply chains. It further sets out the additional steps that we intend to take during 2024.

Hartree 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-Corruption. These principles enable us to manage risk in the markets, activities and jurisdictions in which we operate. We are committed to acting with integrity when conducting our business and to improving our practices to prevent Modern Slavery.

I. Measures to prevent and reduce the risks of Modern Slavery in financial year 2023

In 2023, Hartree took the following measures to prevent and reduce the risk of Modern Slavery in our activities and supply chains:

- We implemented a global telephone and web reporting mechanism available to both employees of all Hartree entities and third parties to facilitate the reporting of Modern Slavery issues.
- Hartree also adopted a Supplier Code of Conduct (“**Supplier Code**”) which we will use to develop and strengthen relationships with suppliers who are committed to, and act in accordance with, the principles set out in such Supplier Code. 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; and,
- HPLP conducted a preliminary, desk-top assessment of its potential Modern Slavery risks for the countries in which physical products were obtained during 2023.

¹ Unless expressly stated otherwise, references in this statement to “Hartree”, “we”, “us” and “our” refer to HPLP and its subsidiaries, including HPUK and HPPG, and excluding the Sprague and Ampyr groups of companies, BIOX Canada Limited and World Energy Harrisburg LLC (“**Hartree**”).

II. Other Information

1) Our operations, structure and supply chain

Our operations

Hartree is a global energy and commodities trading company that operates in both the physical and financial markets with a primary focus on energy, metals, renewables, agricultural/soft commodities and securities. Hartree also invests in global energy infrastructure and provides energy market consultancy services.

HPUK and its subsidiaries engage in proprietary trading in physical commodities, including, but not limited to, crude oil, petroleum products, base metals, soft and agricultural commodities and carry on the business of suppliers, distributors and dealers of such commodities.

HPPG and its subsidiaries engage in proprietary trading of 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.

Our organisation structure

HPLP is a limited partnership duly formed in the State of Delaware, USA with its headquarters in New York City, USA and is the ultimate controlling entity of HPUK and HPPG. At December 31, 2023, Hartree, directly and through its employing subsidiaries, had approximately 960 employees worldwide and operated primarily through 17 offices with locations in the US, Europe, Asia, South America, South Africa and the Middle East. Hartree's business is conducted through HPLP and its various subsidiaries on a global basis.

Hartree strives to ensure that our worldwide offices work together to achieve the same goals and adhere to commitments regarding Modern Slavery.

HPUK and HPPG are part of a global energy and commodities trading business. The current jurisdictional remit of both HPUK and HPPG is primarily limited to the UK and Europe. At 31 December 2023, HPUK had approximately 190 employees and HPPG had no employees.

Our supply chains

In 2023, HPLP sourced physical products including energy, metals, renewables, and agricultural/soft commodities (singularly, a "**Product**" and collectively, "**Products**") and its supply chains primarily involved trading counterparties, producers and other intermediaries. HPLP does not have a separate procurement function. Product suppliers are engaged by the various business units and know your counterparty ("**KYC**") checks are performed by the compliance team as described in Section 3) below.

In 2023, HPUK's supply chains primarily involved sourcing agricultural/soft energy commodities and metals from trading counterparties. HPPG's supply chains during this same period primarily involved sourcing energy commodities and renewables from trading counterparties. HPPG also purchased limited volumes of physical metals and agricultural commodities, which were not purchased at source or in high-risk jurisdictions but from trading counterparties.

The contractors we employ are subject to processes administered by our Human Resources team; ensuring that any employee has a right to work in a specific location(s) is part of those processes. Where external agencies are utilised to provide staff, these agencies are subject to due diligence processes.

We have zero tolerance for Modern Slavery in our supply chains.

2) Our policies on Modern Slavery

As Hartree is committed to ensuring that there is no Modern Slavery in its supply chains or in any part of its business, we continue to review our practices as we build out our corporate compliance programme to reflect our continuing growth as a business.

During 2023, we adopted a Supplier Code, which is publicly posted on our website and reflects our zero tolerance to slavery, human trafficking and child labour.

Hartree also maintains a policy on Modern Slavery and Human Trafficking as well as an employee Code of Conduct that reinforces our commitment to respecting human rights and reducing the risk of Modern Slavery in all of our business practices.

Additionally, to support reporting under our policies, Hartree implemented a global telephone and web reporting mechanism during the reporting year to facilitate the reporting of Modern Slavery and other issues by employees and third parties.

3) Due diligence processes for Modern Slavery

Hartree conducts due diligence on all of its external trading counterparties prior to entering into any business relationship with them. Depending on the risk profile of the 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 with them and the jurisdiction within which they operate. These KYC checks also comprise screening for risks such as trade sanctions, money laundering and bribery infringements. This screening is undertaken both at initial onboarding and on an ongoing basis. Any issues of concern are escalated within Hartree.

The KYC process also comprises identification and review of adverse media reports and as such will highlight various issues with respect to human rights that may be in the public domain related to our trading counterparties. We will continue to refine these processes and look at incorporating human rights, including Modern Slavery, into the risk assessment of our counterparties in a more systematised way.

4) Risk assessment and management

As we undertake risk assessments and on-going due diligence of our operations globally, we believe that there is low risk of involvement with Modern Slavery in our own operations. This conclusion is based on assessments of relevant business units, our hiring entities and our human resource hiring practices.

We recognise that there may be heightened Modern Slavery related risks in the supply chain pertaining to our sourced Products. Currently, the processes in place to determine the risk of

human rights violations are limited to the personnel of Hartree and our onboarding of trading counterparties pursuant to our KYC checks. Regarding the 2023 supply chains for HPLP, HPUK and HPPG sourced Products, we believe that there may be heightened risks associated with the purchase of certain commodities, including metals and agricultural/soft commodities. We also recognize that there may be heightened risk due to the particular countries in which some of our Products, particularly metals, are sourced.

We conducted a preliminary, desk-top assessment of potential Modern Slavery risks for the countries in which HPLP obtained Products in financial year 2023 and continue to develop data collection processes in respect of such assessments.

Hartree has a strong commitment to acting ethically and with integrity in our commercial relationships; and, in support of this, as our business and footprint expands, we will work towards further implementation of effective systems and controls that ensure Modern Slavery is not taking place anywhere in our supply chains.

As a result, we continue to identify various steps, as set out in Section 8), to mitigate such risks.

5) Our effectiveness in combating Modern Slavery/key performance indicators

As Hartree builds out its corporate compliance programme, we will put in place a set of key performance indicators (“**KPIs**”) that will give us insight into the performance of our organisation. Although we have 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 Modern Slavery and human rights perspective.

6) Training

Hartree’s intention 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 Hartree 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. Any such training will apply to employees based on an assessment of the risk of Modern Slavery they encounter in performing their role.

7) Grievance mechanism and remediation

Hartree is committed to the highest levels of ethics and integrity in the way that it does business. We recognize our responsibility to report unethical behavior and voice any concerns. To facilitate this, Hartree established an Ethics Hotline for employees and third parties to report misconduct, including misconduct related to Modern Slavery and other human rights risks. The Ethics Hotline is an anonymous and 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. Hartree will take all reports made through this system seriously.

Our Supplier Code, introduced during 2023, requires suppliers to monitor their respective compliance with the code and report any material issues arising from adhering to the code to our Ethics Hotline as soon as possible.

During 2023, Hartree did not receive any complaints through the Ethics Hotline which involved allegations related to Modern Slavery nor did Hartree identify any specific instances of Modern Slavery; accordingly, Hartree did not address or remedy any occurrences of Modern Slavery during this period.

8) Next steps

Hartree anticipates taking the following steps to further combat Modern Slavery:

- Continue to build out Hartree’s compliance programme;
- Initiate a more detailed risk mapping exercise of any Modern Slavery risk that Hartree has in our supply chains;
- Continue to work with various Hartree teams to develop data that allows us to better assess the risk of Modern Slavery in our supply chains;
- Build out the integration of the Supplier Code of Conduct into our onboarding process;
- 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.

9) Other relevant information

During 2023, HPLP and HPUK purchased Products from Hartree-related entities listed in Table 1 below. The entities listed in Section A are related entities that are subject to the same processes described in sections 2) –7) above. As such, no additional steps were taken by HPLP or HPUK in respect of Modern Slavery.

The entities in Section B are responsible for their own compliance policies and processes, therefore, neither HPLP nor HPUK took steps in relation to these suppliers during the 2023 financial year in respect of Modern Slavery.

TABLE 1 – Related-entity Suppliers of Product

HPLP	HPUK
Section A	
HPUK Hartree NEC, LLC Hartree Marine Fuels, LLC HP Carbon, LLC	HPLP HPPG Hartree (Germany) GmbH
Section B	
Biox Canada Limited Sprague Operating Resources, LLC	

10) Approval and attestation

Hartree Partners, LP

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 2023. It was approved by Hartree Partners GP, LLC, the general partner of Hartree Partners, LP on 26 July 2024

Hartree Partners, LP

By: its General Partner Hartree Partners GP, LLC

DocuSigned by:

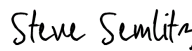
AE077B232204419...

Name: Stephen M. Semlitz

Title: Managing Director
26 July 2024

Hartree Partners (UK) Limited

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 2023. It was approved by the board of HPUK on 26 July 2024

DocuSigned by:

AE077B232204419...

Name Stephen M. Semlitz

Title: Director
Date: 26 July 2024

Hartree Partners Power & Gas Company (UK) Limited

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 2023. It was approved by the board of HPPG on 26 July 2024

DocuSigned by:

AE077B232204419...

Name Stephen M. Semlitz

Title: Director
Date: 26 July 2024