

Hartree Partners, LP
Environmental Social Governance Policy
August 2024

I. INTRODUCTION

Hartree recognizes that society’s expectations of how responsible companies explore commercial opportunities are evolving. We believe that Environmental, Social and Governance (“ESG”) considerations are fundamental to creating long term value for our business, employees, the environment and society. Hartree is committed to making ethical business decisions that reflect our core value of integrity.

We believe that in order to maintain the highest standards of integrity we must integrate ESG principles and practices throughout our diverse business activities. We strive to align ourselves with the principles-based approach to doing business outlined in the Ten Principles of the UN Global Compact: Human Rights, Labor, Environment and Anti-Corruption. These principles enable us to manage risk in the markets, activities and jurisdictions in which we operate. ESG also allows us to protect value and ensure alignment with our stakeholder expectations. Our stakeholders include our employees, financial institutions, counterparties, suppliers and customers, and the communities which we impact.

Hartree’s commitment to ESG is reflected in these key principles:

- Commitment to the environment and responsible innovation that helps meet society’s demand for reliable and sustainable energy
- Respect of our people and the communities in which we operate
- Integrity, ethics and compliance in how we conduct our business activities

II. POLICY GOVERNANCE

Hartree is a global merchant commodities firm with a diverse activity set focused on globally traded commodities. We seek to promote ESG engagement and transparency through this ESG policy (the “Policy”) while seeking to implement best practices. This Policy applies to activities undertaken by or on behalf of Hartree and its subsidiaries across the globe.

Our ESG Steering Team (the “Team”) is comprised of senior leaders from across the firm representing commercial, assets, and functions. Currently, the Team is led by the Global Head of Compliance & ESG. The Team is responsible for reviewing the firm’s ESG strategy and policy, recommending policy goals and evaluating best practices. Policy goals and commitments are reviewed annually by the Team. This group reports regularly to Hartree’s senior management and Executive Committee.

III. OUR COMMITMENTS

This Policy is built on the following areas that reflect existing and emerging standards of ESG:

Commitment to the Environment

Hartree recognizes the importance of protecting the planet and natural resources. Actively managing sustainability and ESG issues is important to the success of our business and in creating long-term value for our stakeholders. A growing part of our business focuses on Environmental Markets, in particular carbon offsets. This reflects our belief that markets play an active role in transitioning the world away from a predominantly fossil fuel-based economy. Additionally, we will continue to map our carbon footprint, evaluate opportunities to neutralize operational emissions, and look for ways to embed

carbon neutral technology in our own portfolio. Our Environmental Sustainability & Climate Policy outlines our ambitions across Hartree's business segments.

Respect of People and Communities

Hartree respects the human rights of our employees and the communities in which we operate. Hartree is committed to providing a workplace which is safe for our employees and all others who may be affected by our undertakings and attaining the highest achievable standards of occupational health, safety and protection of the environment where reasonably practicable. In our offices and our operating facilities around the world we adhere to all relevant health and safety standards. Through our global incident management system for all Hartree assets, we track incident and safety data and actively measure health and safety Key Performance Indicators (KPIs) and seek to instill procedures which will continue to enhance safety.

We understand that we benefit from diverse perspectives and strive to ensure that all employees are treated with dignity. Hartree fosters employee development and strives for overall workplace engagement. Importantly, as reflected in our Code of Conduct, we expect our employees will not engage in or tolerate unethical or unlawful workplace conduct, including discrimination, harassment or retaliation.

Outside of our offices and operations, in the communities with which Hartree interacts, we are committed to protecting human rights and engaging responsibly with counterparties and suppliers. Our goal is to implement specific objectives that prioritize areas directly influenced by Hartree's operations. Through these initiatives, we aim to actively engage with and support our local communities, contributing positively to their well-being and aligning with our broader sustainability goals.

Integrity, Ethics & Compliance

Integrity is at the core of Hartree's culture. Hartree is committed to maintaining the highest ethical and legal standards and conducting business in compliance with all applicable laws and regulations wherever we operate. We seek to apply the highest recognized standards across our global activities when managing risks and opportunities that touch business conduct areas such as fraud, corruption, bribery, and other behavior that may have an ethical component. Our robust AML requirements set out in our KYC process are applied globally and ensure a high standard of rigor in our due diligence processes. Adherence to the expectations set out in our Anti-Bribery and Corruption Policy is required of all our employees.

IV. Current Policy Goals

Hartree is committed to the on-going development of policies and procedures which reflect our key ESG principles. Our current ambitions include:

- Implementing a revised Environmental Sustainability & Climate Policy
- Updating our Anti-Money Laundering and Modern Slavery policies
- Evaluating and implementing relevant DE&I metrics
- Implementing GHG accounting software (Scope 5 ESG Reporting & Sustainability software) across all Hartree business units to enhance our ability to accurately track and report greenhouse gas emissions.