

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

Joint Statement 2024

This statement relates to the financial year ending 31 December 2024 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**"), two UK operating subsidiaries Hartree Partners (UK) Limited ("**HPUK**") and Hartree Partners Power & Gas Company (UK) Limited ("**HPPG**") as well as Hartree Metallia (UK) Limited ("**Hartree Metallia**"). The information provided below generally applies to HPLP, HPUK, HPPG and Hartree Metallia as these entities have the same policies, which are issued by HPLP.

This statement sets out the steps that Hartree 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 2025.

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 2024

In 2024, Hartree took the following measures to prevent and reduce the risk of Modern Slavery in our activities and supply chains:

- Acquired a learning management system which includes modules on slavery and human trafficking to train higher-risk staff appropriately.
- Updated our Environmental Social Governance ("ESG") Policy which includes our commitment to respect people and communities. Specifically, with regard to our offices and operations and in the communities with which Hartree interacts, we are committed to protecting human rights, which includes Modern Slavery.
- Expanded the ESG team, which includes responsibility for Modern Slavery issues.
- Conducted internal consultations across Compliance, Finance, Legal and Trading to identify priority areas for enhanced supply chain due diligence.

II. Other information

1) Our organisational structure, business and supply chains

Our organisational structure

HPLP is a limited partnership duly formed in the State of Delaware, USA with our headquarters in New York City, USA. Hartree engages in trading, distribution and storage, and investing activities which are conducted through various subsidiary entities with 18 offices located in North America,

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South America, Europe, Asia, Australia, and Africa. On December 31, 2024, Hartree, directly and through our employing subsidiaries, had 1,032 employees worldwide (excluding the Sprague group of companies).

HPLP is privately held by management and various Oaktree Capital Management L. P. entities. It is the immediate parent undertaking of both HPUK and HPPG. Hartree Metallia is a wholly owned subsidiary of Hartree Metallia, LLC, a limited liability company incorporated in the State of Delaware, United States of America, which in turn is wholly owned by HPLP. HPUK, HPPG and Hartree Metallia are part of our global energy and commodities trading business and primarily active in the UK and Europe. On 31 December 2024, HPUK had 249 employees (excluding overseas subsidiaries) and HPPG and Hartree Metallia had no employees.

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

Our business

HPLP is a global energy and commodities trading, consulting and operating company, that participates in both the physical and financial markets, with a primary focus on energy, metals and metals concentrates, renewables, emission credits, agricultural and soft commodities as well as securities.

HPUK and its subsidiaries engage in proprietary trading in physical commodities, including 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 credits, 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 credits. From time to time, HPPG also trades in physical metals, agricultural commodities, equities, exchange traded indexes, oil and refined products.

Hartree Metallia engages in merchant international trading of physical steel products in Europe and the UK. It also carries inventories of steel to help customers with Just-In-Time inventory management needs and assists in price risk management.

Our supply chains

In 2024, HPLP sourced physical products including energy such as petroleum, natural gas, and electricity, metals and minerals such as aluminium, copper and iron, biofuels, emission credits and offsets such as RECs and RINs, and other commodities such as corn, (singularly, each a “**Product**” and collectively, “**Products**”) on a global basis from trading counterparties, which include both producers and intermediaries. HPUK’s supply chains primarily involved sourcing energy commodities such as crude oil, biofuels, base metals such as aluminium and agricultural/soft commodities such as sun seed from trading counterparties, producers and other intermediaries. HPPG’s supply chains during this same period primarily involved sourcing energy commodities such as natural gas, LNG and electricity and emissions credits such as EUAs from trading counterparties and producers. Hartree Metallia’s supply chain centred on various steel products sourced from producers during 2024.

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Hartree does not have a separate procurement function. Our trading counterparties that supply Products are engaged by the various business units and know your counterparty (“KYC”) checks are performed by the compliance team as described in Section **Error! Reference source not found.** below. We acknowledge that visibility below Tier 1 remains limited, especially for commodities such as metals and minerals as well as some energy commodities. We are working to map these complex supply chains and will prioritise high-risk geographies and products. We also recognise that risks may arise not only in product supply chains but also within labour supply chains. 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. The responsibilities for identifying, assessing and responding to Modern Slavery rest with the respective business unit and the ESG function. The ESG function is overseen by the Global Head of Compliance and ESG, who in turn reports to senior management.

2) Our organisational policies

Hartree is committed to ensuring that there is no Modern Slavery in our supply chains or in any part of our business. In 2024, we maintained and/or updated the following policies:

- Modern Slavery and Human Trafficking Policy
- Hartree Partners Code of Conduct
- Hartree Partners Supplier Code of Conduct
- ESG Policy (updated in 2024).

These policies – publicly available at: <https://www.hartreepartners.com/documents/> – reinforce our commitment to respecting human rights and reducing the risk of Modern Slavery in all of our business practices. We align ourselves 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.

Policies are accessible to staff globally as well as suppliers / subcontractors via public posting on our website. In our Modern Slavery and Human Trafficking Policy, Hartree maintains a zero-tolerance policy regarding modern slavery in any form. Our Code of Conduct forms an integral part of the Compliance New Starter training for the Front Office. It sets out minimum expectations for all Hartree employees, including a commitment to supporting efforts to protect human rights and reiterating our zero-tolerance approach to Modern Slavery and applies to every individual working for Hartree, including all subsidiaries and group companies unless the Hartree entity has its own code of conduct. Our Supplier Code of Conduct prohibits slavery, human trafficking and child labour and requires suppliers to respect human rights. The Supplier Code of Conduct, which is available on our website, also requires suppliers to monitor their respective compliance with the code and report any material issues arising from adhering to the code as soon as possible to our Ethics Hotline, a global telephone and web reporting mechanism available to both employees and third parties to facilitate the reporting of Modern Slavery and other concerns (“**Ethics Hotline**”).

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In 2024, we updated our ESG policy which includes, amongst other items, our commitment to respect people and communities. Specifically, with regard to our offices and operations and in the communities with which Hartree interacts, we are committed to protecting human rights. Policies are reviewed at regular intervals. We continue to review our practices while we build out our ESG programme in line with business growth and are exploring the development of additional policies that may be deemed necessary, including ones that will also address Modern Slavery risks.

3) Our risk assessment and management

As we undertake risk assessments and on-going due diligence of our operations globally, we believe that there is limited 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.

Currently, the processes in place to determine the risk of human rights violations are limited to the personnel of Hartree and our subsidiaries as well as our onboarding of trading counterparties pursuant to our KYC checks. We conducted a preliminary, desk-top assessment of potential Modern Slavery risks for the countries in which Hartree obtained Products in financial year 2023 and are determining the appropriate timeframe in which to reassess these risks based on new commercial activity. In 2024, we developed a supplier questionnaire that is being piloted with one of HPLP's subsidiaries.

While we have made progress, our supply chain transparency remains incomplete, and we are working to improve it. Regarding the 2024 supply chains for HPLP, HPUK, HPPG and Hartree Metallia sourced Products, we believe that there may be heightened risks associated with the purchase of certain commodities including metals and minerals, agricultural products / soft commodities, as well as emission credits and solar panels. We also recognize that there may be heightened risk due to the countries from which some of our Products are sourced. Responsibilities for identifying and responding to these risks rest with the respective business unit and the ESG function, to which capacity has been added in 2024, and which report to senior management.

Hartree has a strong commitment to acting ethically and with integrity in our commercial relationships; and, as our business and footprint expands, as part of this commitment, we will work towards further implementing systems and processes that help detect and prevent Modern Slavery risks in our supply chains.

4) Our due diligence in relation to Modern Slavery

Hartree conducts due diligence on our 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 several 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

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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 human rights that may be in the public domain with respect to our trading counterparties. In 2024, we began evaluating the potential for supplier questionnaires and independent third-party reviews for higher-risk Products. This resulted in the roll-out of a supplier questionnaire pilot (embedded into our onboarding process) for one of HPLP's subsidiaries in Q4 2024. The results of the pilot will be analysed during 2025 and next steps defined accordingly. As we continue to build out our ESG programme, we will refine our due diligence processes and look at incorporating human rights, including Modern Slavery, into the risk assessment of our counterparties in a more systematised way.

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 behaviour and voice any concerns. To facilitate this, Hartree established a global Ethics Hotline – a web and phone-based reporting mechanism available to 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 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.

In 2024, Hartree did not identify any instances of Modern Slavery in its supply chains nor were there any reports to our Ethics Hotline, which involved allegations related to Modern Slavery. Accordingly, during 2024, no measures were required by Hartree to remediate any occurrences of Modern Slavery across our operations and/or supply chains.

5) Our training

In 2024, Hartree acquired a third-party learning management system which includes modules on slavery and human trafficking. We seek to implement a training programme for Hartree employees on a global basis based on an assessment of the risk of Modern Slavery they encounter in performing their role. 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 ESG programme matures.

6) Our monitoring and evaluation: understanding and demonstrating effectiveness

As Hartree builds out its ESG programme, we will put in place a set of key performance indicators (“KPIs”) that will give us insight into the performance of our organisation and the effectiveness of our compliance with the UK Modern Slavery Act 2015. 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 such as ‘% of relevant employees completing Modern Slavery training’ as well as additional vetting of higher-risk trading counterparties. Potential KPIs could include ‘number of counterparties assessed as high-risk and subject to enhanced due diligence’ and ‘% of suppliers receiving and acknowledging the Supplier Code of Conduct’. Going forward, the intent is to use findings from future quantitative and qualitative

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metrics to inform risk-based decisions and supplier engagement. Responsibility for monitoring and evaluation of goal setting and KPIs would rest with the respective business unit with support from the ESG function. We also envision periodic self-assessments of our programme practices to evaluate our effectiveness in addressing potential Modern Slavery risks.

7) Other relevant information

During 2024, HPLP, HPUK and HPPG 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 **Error! Reference source not found. –Error! Reference source not found.** above. As such, no additional steps were taken by HPLP, HPUK or HPPG in respect of Modern Slavery.

The entities in Section B are responsible for their own compliance policies and processes, therefore, neither HPLP, HPUK nor HPPG took steps in relation to these suppliers during the 2024 financial year in respect of Modern Slavery.

TABLE 1 – Related-entity Suppliers of Product

HPLP	HPUK	HPPG
Section A		
HET Levelland HP Carbon, LLC Hartree NEC, LLC HPUK	Hartree (Germany) GmbH	Hartree Partners Supply (UK) Limited
Section B		
Hartree Refining Holdco, LLC Sprague Operating Resources, LLC World Energy Harrisburg, LLC		

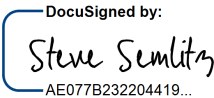
8) Approval and attestation

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 2024. It was approved by Hartree Partners GP, LLC, the general partner of Hartree Partners, LP on 27 June 2025.

Hartree Partners, LP

By: its General Partner Hartree Partners GP, LLC

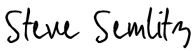
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Name: Stephen M. Semlitz
Title: Managing Director

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Hartree Partners (UK) Limited (“HPUK”)

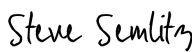
This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2024. It was approved by the board HPUK on 27 June 2025.

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Name: Stephen M. Semlitz
Title: Director
Date: 27 June 2025

Hartree Partners Power & Gas Company (UK) Limited (“HPPG”)

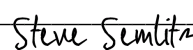
This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2024. It was approved by the board of HPPG on 27 June 2025.

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Name: Stephen M. Semlitz
Title: Director
Date: 27 June 2025

Hartree Metallia (UK) Limited (“Hartree Metallia”)

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Name: Stephen M. Semlitz
Title: Director
Date: 27 June 2025