

Report Under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

The following is Hartree Partners, LP's report for the financial year ending 31 December 2024, to fulfill its requirements under the Canadian *Act to Enact Fighting Against Forced Labour and Child Labour in Supply Chains* ("**Canadian FLCL**").

Unless expressly stated otherwise, references to "Hartree", "we", "us" and "our" refer to Hartree Partners, LP and its subsidiaries, excluding the Sprague group of companies ("**Hartree**"). This report 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.

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 fiscal year 2024

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

- We acquired a learning management system which includes modules on slavery and human trafficking to provide relevant training to higher risk staff as appropriate.
- Hartree also updated its 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.
- Hartree expanded the team covering ESG matters, which includes Modern Slavery.

II. Other Information

1) Our structure, activities and supply chains

Our organisational structure

Hartree Partners, LP is a limited partnership duly formed in the State of Delaware, USA with our headquarters in New York City, USA. At December 31, 2024, Hartree, directly and through our employing subsidiaries, had 1,032 employees worldwide (excluding the Sprague group of companies) and operated primarily through 18 offices with locations in the US, Europe, Asia, South America, South Africa and the Mid-East. Hartree's business is conducted through Hartree Partners, LP and our various subsidiaries on a global basis.

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

Our activities

Hartree 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, renewables, agricultural/soft commodities and securities. During the 2024 fiscal year, Hartree imported energy and agricultural products into Canada.

Our supply chains

In 2024, we sourced physical products including energy, metals and minerals, renewables, and agricultural/soft commodities (singularly, a “**Product**” and collectively, “**Products**”) on a global basis and our supply chains primarily involved trading counterparties, producers and other intermediaries. Hartree does not have a separate procurement function. Product suppliers are engaged by the various business units and KYC checks are performed by the compliance team as described in Section 2) below.

Contractors we employ are subject to processes administered by our Human Resources team; ensuring that any employee has a right to work in 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 and due diligence process in relation to Modern Slavery

Our Policies

As Hartree is committed to ensuring that there is no Modern Slavery in our supply chains or in any part of our business, we continue to review our practices as we build out our human rights due diligence programme to reflect our continuing growth as a business. Our policies can be found on our website at <https://www.hartreepartners.com/documents/>.

In our Modern Slavery and Human Trafficking Policy, Hartree maintains a zero-tolerance policy regarding modern slavery in any form. Hartree has a Code of Conduct that 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. Our Supplier Code of Conduct prohibits slavery, human trafficking and child labour and requires suppliers to respect human rights. The Supplier Code of Conduct 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.

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.

Hartree has 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**”).

Due diligence processes

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 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.

3) Modern Slavery 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 human rights related risks, including the risk of forced labour and child labour, in the supply chains 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 subsidiaries and our onboarding of trading counterparties pursuant to our KYC checks.

Regarding Hartree’s global supply chains for our sourced Products, we believe that there may be heightened risks associated with the purchase of certain commodities including metals and minerals and agricultural/soft commodities, as well as carbon credits and solar panels. We also recognize that there may be heightened risk due to the particular countries in which some of our Products, particularly metals and minerals, are sourced.

In 2024, we continued to evaluate our systems and the associated data required to assist in our assessment of Modern Slavery risks as they relate to our Products and the countries in which we obtain our Products.

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) Remediation measures

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 (i) remediate any forced labour or child labour or (ii) remediate any loss of income to the most vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour.

5) Training

In 2024, Hartree acquired a 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 effectiveness in combating Modern Slavery

As Hartree builds out our ESG programme, we envision putting 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 Canadian FLCL regulations. 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 as well as additional vetting of higher-risk trading counterparties. We also envision periodic self-assessments of our programme practices to evaluate our effectiveness in addressing potential Modern Slavery risks.

7) Other relevant information

Hartree Partners, LP will submit a Modern Slavery statement pursuant to the United Kingdom’s *Modern Slavery Act 2015* for the fiscal year 2024.

	Hartree Partners, LP
Description	U.S.-based energy and commodity trading entity
Categorization	Entity
Canadian Business Number	83342 6141
Sector/Industry	Wholesale Trade
Location	New York, NY, USA

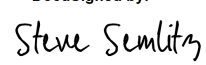
8) Approval and attestation

Hartree Partners, LP

This report has been approved by the Managing Director of Hartree Partners, LP, in accordance with subparagraph 11(4)(a) of the Canadian FLCL.

In the capacity of Managing Director, I attest that I have reviewed the information contained in the report on behalf of the governing body of Hartree Partners, LP. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canadian FLCL for the 2024 reporting year.

By: Hartree Partners, LP

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I have the authority to bind Hartree Partners, LP

Name: Stephen M. Semlitz

Title: Managing Director

Date: May 16, 2025