

Hartree Partners, LP
Responsible Business Policy
January 2026

INTRODUCTION

This document contains Hartree's Responsible Business policy framework. It establishes our high level priorities and commitments, as reflected in three key principles:

1. Commitment to the environment and innovation that helps meet society's demand for reliable, sustainable energy, metals, and food systems
2. Respect for our people and the communities in which we operate, at home and abroad
3. The highest levels of integrity, ethics, and compliance in how we conduct business activities

We believe Environmental, Social, and Governance ("ESG") considerations are fundamental to creating long term value for our business, employees, the environment, and society.

We strive to align ourselves with the principles-based approach to doing business as outlined in the Ten Principles of the UN Global Compact across Human Rights, Labor, Environment and Anti-Corruption. These principles enable us to manage risk across activities and jurisdictions in which we operate. Our framework also allows us to protect value and ensure alignment with stakeholder expectations. These include our employees, financial institutions, counterparties, suppliers, and customers, as well as the communities which we impact.

This global policy and the framework it establishes applies to all Hartree businesses and wholly-owned subsidiaries. Individual trading desks and/or assets may continue to develop more tailored approaches to their operations, supply chains, and customer needs – particularly those in metals and agricultural segments – recognizing the fundamental differences between these commodity types and encouraging specific efforts to increase ambition where it is possible.

POLICY GOVERNANCE

Hartree is a global merchant commodities firm with a diverse activity set focused on traded products. We seek to promote engagement and transparency through this policy (the "Policy") whilst implementing industry best practices.

Our ESG Steering Committee (the "Committee") is comprised of senior leaders from across the firm representing commercial, assets, and functions. Currently, the Committee is led by the Global Head of Compliance & ESG. The Committee is responsible for reviewing the firm's ESG-related strategy and policies, recommending goals, evaluating best practices, and monitoring applicable regulatory requirements. Policy commitments and goals are reviewed annually by the Team.

Hartree is committed to the ongoing assessment of our policies, to ensure they reflect core principles and evolution of both business activities and external stakeholder requirements.

OUR GUIDING PRINCIPLES AND COMMITMENTS

I. Commitment to the environment and responsible innovation that helps meet society's demand for reliable, sustainable energy, metals, and food systems

We recognize that actively managing sustainability and environmental impact is important to the success of our business and long-term value creation for our stakeholders. In line with environmental responsibility, Hartree is committed to the following:

Facilitating the energy transition as part of ongoing core business activities

- A growing part of our business focuses on lower-carbon energy sources and environmental commodities, reflecting our belief that markets will play an active role in transitioning the world away from a predominantly fossil fuel-based economy
- We are active players in the development of carbon markets, as well as trade biofuels and many of the metals necessary for the energy transition
- We have dedicated businesses and joint ventures related to renewable energy and power generation
- We track low-carbon investments with the ambition to maintain or increase our share of energy transition-related capital deployed, including through our dedicated cleantech & climate fund

Minimizing and reducing our environmental impacts over time

- We measure our operational (Scope 1 and 2) emissions and assess options to mitigate or reduce these. Recognizing our active acquisition strategy, we are evaluating the use of dynamic baselines to ensure environmental reporting accurately reflects efficiency and performance relative to our growth.
- We are actively expanding our Scope 3 emissions accounting and developing appropriate methodologies to assess and quantify material categories. We seek to actively participate in shaping the best methodological approaches for addressing value chain impact as commodity traders.
- Active tracking and management of energy consumption at owned or operated facilities
- We maintain the highest levels of HSE compliance and proactive management including spill prevention, water and waste management, and biodiversity assessments across relevant assets

We continue to evaluate opportunities to better manage our greenhouse gas footprint (including the potential for setting specific emission reduction targets) and embed carbon neutral technology throughout our portfolio. We support the goals of the Paris Agreement and role that private sector participants like ourselves can play in enabling the transition to a lower-carbon world.

II. Respect for our people and the communities in which we operate, at home and abroad

Hartree is committed to providing a safe workplace and attaining the highest achievable standards of occupational health, safety, and environmental protection. 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.

In line with the growth of our business activities into both more diverse and physically traded products, Hartree is invested in improving value chain transparency and ensuring that appropriate safeguards are in

place. We continue to develop learning and training programs to support employee growth and engagement and actively seek engagement of stakeholders to strengthen our positioning. In line with these commitments, we:

Promote transparency and resiliency in our supply chains

- We are committed to protecting human rights and engaging responsibly with counterparties and suppliers (as outlined in our [Supplier Code of Conduct](#) and responsible sourcing-related policies for [Agricultural Commodities](#) and [Metals Concentrates](#))
- We are actively engaged in a programmatic roll-out of enhanced supply chain initiatives, including systems implementation for due diligence. This includes working towards greater visibility in our supply chains, with the objective of mapping key suppliers to better understand our broader value chain impacts and risk profiles.
- We will continue implementing specific objectives and initiatives that prioritize areas directly influenced by Hartree's operations

Support our people and keep them safe

- We adhere to the Ten Principles of the UN Global Compact and comply with all global labor standards, including anti-modern slavery and child labor
- Through our global incident management system for Hartree assets, we track incident and safety data and actively measure health and safety Key Performance Indicators (KPIs). We consistently strive to minimize and/or reduce total recordable injury rates and fatalities.
- Grievance mechanisms are in place at all operated facilities, combining a centralized global hotline (NAVEX) with local asset-specific policies where required. We regularly conduct labor and occupational health & safety training across our operations.
- In-house rotational and internship programs encourage development of the next generation(s) of talent, alongside increased roll-out of regular staff trainings
- We conduct quarterly HR reporting and annual employee engagement surveys
- Local offices and subsidiaries are encouraged to support their local communities through volunteer initiatives, designing programs that align best with specific operational and cultural contexts.

We aim to actively engage with and support our communities, contributing positively to their well-being and aligning with our broader sustainability goals.

III. The highest levels of integrity, ethics, and compliance in how we conduct our business activities

Integrity is at the core of Hartree's culture. As a US-headquartered company, we differentiate ourselves on the basis of strong oversight and a 25+ year track record of ethical business operations. The company 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 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 AML requirements set out in our trading counterparty 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 Anti-Corruption Policy is required of all our employees

Operating as an integrity-driven organization

- Our strategy framework is regularly reviewed and updated in line with business evolution and stakeholder expectations
- We maintain governance of these topics via our ESG Steering Committee and executive level representation via the Global Head of Compliance & ESG. A Corporate Responsibility team manages daily oversight and coordinates execution amongst relevant stakeholders.
- Hartree also applies a commercial lens to these topics, reflective of our belief that beyond ESG compliance, one of the most significant roles we can play is applying our knowledge of global energy, food, and trade systems to enable a low carbon transition through data-driven, market-based approaches