

HARTREE PARTNERS, LP

SUPPLIER CODE OF CONDUCT

ABOUT THIS CODE

Corporate integrity, responsible sourcing, and the safety and well-being of workers in the countries where we do business are important to Hartree Partners, LP and its wholly owned subsidiaries ("Hartree"). These principles are reflected in this Supplier Code of Conduct ("Code"), which explains what Hartree expects from you when you supply products or services to Hartree.

This Code does not replace or override applicable laws, regulations, or your contractual obligations to Hartree.

Hartree's approach to corporate responsibility is set out in its Code of Conduct and Responsible Business Policy. You should understand that environmental, social, and governance ("ESG") considerations are fundamental to creating long-term value for our business, our employees, the environment, and society. We strive to align our business with a principles- and risk-based approach guided by the principles enumerated in the Ten Principles of the UN Global Compact across human rights, labor, environment, and anti-corruption ("Ten Principles").

We encourage you to apply international standards, such as the Ten Principles, in your own operations and in your relationships with your suppliers and subcontractors. We seek to build long-term relationships with suppliers who are committed to acting in accordance with these principles and applicable laws.

RESPONSIBLE BUSINESS CONDUCT

You are expected to conduct your business in compliance with all applicable laws governing your operations, including laws related to labor and employment, human rights, health and safety, environmental protection, competition, anti-money laundering, and anti-bribery and corruption. You should maintain policies or practices appropriate to your size, sector, and the nature of your operations.

SOCIAL RESPONSIBILITY

Slavery, human trafficking, and child labor. You must comply with all applicable anti-slavery and human trafficking laws, including the UK Modern Slavery Act 2015 or equivalent legislation. You must not use or support forced labor, child labor, bonded labor, indentured labor, or prison labor.

Human rights. In your operations, you are expected to respect internationally recognized human rights, such as those listed in the Ten Principles.

Equal opportunities. You are expected to maintain an inclusive work environment that is free from discrimination, harassment, violence, intimidation, abuse, or other threats.

Employee concerns. You should have processes that allow employees and others to raise concerns or grievances without fear of retaliation. Concerns may also be reported to Hartree through its anonymous reporting line at <https://www.hartreepartners.com/ethics-hotline/>.

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Freedom of association and collective bargaining. You are expected to respect the lawful rights to freedom of association and collective bargaining, unless restricted by applicable local law.

Working environment. You are expected to provide a safe, healthy, and sanitary working environment and to comply with applicable health and safety laws. You should implement reasonable safeguards to prevent workplace hazards, accidents, and injuries.

ENVIRONMENTAL RESPONSIBILITY

You are expected to comply with all applicable environmental laws and regulations relevant to your operations. You should maintain policies or practices appropriate to your operations to manage environmental risks and maintain a suitable environmental management system.

BRIBERY AND CORRUPTION, MONEY LAUNDERING & UNFAIR BUSINESS PRACTICES

You must comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act 2010, or equivalent laws. You must not offer, promise, authorize, accept, or provide improper payments, bribes, kickbacks, or other unlawful benefits. You are expected to apply proportionate, risk-based processes when engaging agents or other third parties and to communicate relevant principles of this Code where appropriate. Additionally, you must comply with all applicable U.S. and international laws and regulations pertaining to the detection, prevention, and reporting of potential money laundering and terrorist financing activities and applicable competition laws, including laws related to information sharing with competitors, price fixing, and bid rigging.

ACKNOWLEDGEMENT

You may acknowledge the principles stated above or demonstrate your commitment via compliance with your own comparable code of conduct or company policies that embrace these principles.

If Hartree becomes aware of issues related to your compliance with the principles contained in this Code, Hartree may contact you to understand the issue and any remediation plans, if applicable. You remain solely responsible for identifying, assessing, and managing risks associated with your operations, workforce, and business relationships.

This Code does not represent or commit Hartree to conduct independent investigations, audits, or due diligence beyond what is required by applicable law or Hartree's internal risk-based compliance framework. Additionally, this Code does not replace or override applicable laws, regulations, or your contractual obligations to Hartree.

UPDATING THIS CODE

Hartree may modify this Code from time to time, with or without notice, at its sole discretion.

Date: 21 July 2026