Hartree

Responsible Sourcing Policy

(Hartree Metals LLC)

Issued: May 2026

Reference: RS v1.1

Hartree

Introduction

This Policy outlines Hartree Metals LLC's commitments and approach to responsible sourcing of its metals and minerals. Hartree Metals LLC is a private, limited company incorporated in Switzerland and is a subsidiary of Hartree Partners. Our business focuses on the sourcing and distribution of upstream base metal and precious metals concentrates, ores, intermediate and semi-refined products.

Scope

This Policy applies to Hartree Metals LLC's upstream sourcing of minerals and metals. It is focused on our relationships with upstream suppliers and other relevant counterparties, including producers, traders and intermediaries, and does not apply to downstream sales.

Our Commitment and Approach

i. We are committed to acting with integrity and responsibility and seek to comply with applicable regulations.
ii. Through this Policy and wider policies and procedures[1] we encourage our suppliers and other relevant upstream counterparties to undertake responsible sourcing and business practices.
iii. Across relevant upstream operations, we aim to identify, assess, and promote the responsible management of adverse environmental, social and governance impacts.
iv. We seek to take a risk-based approach to our due diligence that respects confidentiality and is proportionate to the risk profile of the counterparty, jurisdiction, commodity, transaction type, information available to us, and our role and leverage.
v. We screen counterparties through know-your-trading-counterparty ("KYC") reviews, and red flag assessments. Where we identify elevated and material risk, we will seek to conduct enhanced due diligence and/or targeted follow-up.
vi. We place a focus on Conflict-Affected and High-Risk Areas[2] and supply-chain risks identified in Annex II of the OECD Due Diligence Guidance[3], and with reference to wider environmental and social topics, to the extent they pertain to a given operation.
vii. We aim for efficient due diligence that avoids unnecessary duplication with other credible actors' ESG assessments & assurance schemes.
viii. We favour engagement with our counterparties over counterparty exclusion, which may include communicating areas for improvement. Where material impacts persist and are not being addressed, we may seek to review, suspend or terminate our continued relationship and/or implement other appropriate risk-mitigation measures.
ix. To support accountability, our stakeholders have access to Hartree Partners' independent third-party reporting channel, through which concerns may be raised confidentially[4].
x. We report on relevant due diligence outcomes to internal management and, where required by applicable law, through our Swiss Conflict Minerals and Child Labour Due Diligence Transparency Report.

Alignment to Industry Standards and Regulations

Our approach has been established with reference to relevant components of the:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO)
- Ten Principles of the UN Global Compact[5]

Implementation & Revisions

This Policy is guided by the Hartree Metals Responsible Sourcing Management System. It is a statement of intent and does not create contractual rights or obligations for any person. We reserve the right to revise or amend this Policy as necessary to ensure its ongoing effectiveness, alignment with legal and regulatory requirements, as well as our business activities.

[1] Reflected in Hartree Partners' Responsible Business Policy, Code of Conduct, Modern Slavery and Human Trafficking Policy, and Supplier Code of Conduct.
[2] See: https://www.cahraslist.net/cahras
[3] Including but not limited to: forced labour, the worst forms of child labour, gross human rights violations, support to armed groups or unlawful security force conduct, bribery, and money laundering.
[4] See Hartree Partners' independent reporting channel, available to Hartree Metals LLC stakeholders, at https://www.hartreepartners.com/ethics-hotline/
[5] And with reference to International Labour Organization (ILO) Conventions 138 (Minimum Age) and 182 (Worst Form of Child Labour)