

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

Joint Report 2023

This report relates to the financial year ending 31 December 2023, and is made in accordance with the Canadian Act to Enact Fighting Against Forced Labour and Child Labour in Supply Chains (“**Canadian FLCL**”).

This is a joint report made on behalf of the Canadian FLCL reporting entities: Hartree Partners, LP and our Swiss operating subsidiary Hartree Metals Sàrl (Hartree Metals LLC) (“**HMS**”). The information provided below generally applies to both Hartree Partners, LP and HMS and these entities have the same policies, issued by Hartree Partners, LP, and similar risk profiles as they primarily transact in commodities. Please see Table 1 in section 9) for additional information on the Canadian FLCL reporting entities.

Unless expressly stated otherwise, references to “Hartree”, “we”, “us” and “our” refer to Hartree Partners, L.P. and its subsidiaries, including HMS and 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. It further sets out the additional steps that we intend to take over the coming year.

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, which includes child labour.

I. Measures to prevent and reduce the risks of Modern Slavery in fiscal year 2023

In the 2023 fiscal year, Hartree took the following measures to prevent and reduce the risk of Modern Slavery in our activities and supply chains:

- In 2023, we implemented a global telephone and web reporting mechanism available to both employees of all Hartree entities and third parties to facilitate the reporting of Modern Slavery issues.
- Hartree also adopted a Supplier Code of Conduct which we will use to develop and strengthen relationships with suppliers who are committed to, and act in accordance with, the principles set out in the code. Hartree believes that all business counterparties should adopt comparable standards and, at a minimum, comply with the international and host country laws and regulations applicable to each counterparty; and,
- We conducted a preliminary, desk-top assessment of our potential Modern Slavery risks for the countries in which we obtain our physical products during 2023.

II. Other Information

1) Our operations, structure and supply chain

Our operations

Hartree is a global energy and commodities trading, consulting and operating company, that operates in both the physical and financial markets, with a primary focus on energy, metals, renewables, agricultural/soft commodities and securities.

HMS is a private, limited company incorporated in Switzerland and is part of the Hartree global energy and commodities trading business. HMS engages in proprietary trading in metal concentrates and semi-refined metals and carries on the business of suppliers, distributors and dealers of such commodities on a global basis.

Our organisation structure

Hartree Partners, LP is a limited partnership duly formed in the State of Delaware, USA with our headquarters in New York City, USA and is the ultimate controlling entity of HMS. At December 31, 2023, Hartree, directly and through our employing subsidiaries, had approximately 960 employees worldwide (excluding the Sprague group of companies) and operated primarily through 17 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 worldwide offices work together to achieve the same goals and adhere to commitments regarding Modern Slavery.

HMS, based in Geneva, Switzerland, is a private limited company incorporated in Switzerland. At 2023 fiscal year end, HMS and its four subsidiaries employed 37 people.

Our supply chains

In 2023, we sourced physical products including energy, metals, renewables, and agricultural/soft commodities (singularly, a "**Product**" and collectively, "**Products**") 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 3) 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 on Modern Slavery

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 corporate compliance programme to reflect our continuing growth as a business.

During 2023, Hartree implemented a global telephone and web reporting mechanism available to both employees and third parties to facilitate the reporting of Modern Slavery issues. Additionally, during 2023, we adopted a Supplier Code of Conduct, which is publicly posted on our website and reflects our zero tolerance to slavery, human trafficking and child labour.

Hartree maintains a policy on Modern Slavery and Human Trafficking as well as an employee Code of Conduct that reinforces our commitment to respecting human rights and reducing the risk of Modern Slavery in all of our business practices.

3) Due diligence processes for Modern Slavery

Hartree conducts due diligence on all of 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 a number of 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. We will continue to refine these processes and look at incorporating human rights, including Modern Slavery, into the risk assessment of our counterparties in a more systematised way.

4) 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 chain 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 supply chain for our sourced Products, we believe that there may be heightened risks associated with the purchase of certain commodities, including metals 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, are sourced.

We continue to develop data collection processes and conducted a preliminary, desk-top assessment of our potential Modern Slavery risks for the countries in which we obtain our Products in fiscal year 2023.

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 and enforcing effective systems and controls that ensure Modern Slavery is not taking place anywhere in our supply chains.

As a result, we continue to identify various steps, as set out in Section 8), to mitigate such risks.

5) Our effectiveness in combating Modern Slavery/key performance indicators

As Hartree builds out our corporate compliance programme, we will put in place a set of key performance indicators (“KPIs”) that will give us insight not only into the performance of our organisation but also 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 in addition to the selection of potential suppliers, which we believe to be higher risk from a Modern Slavery and human rights perspective.

6) Training

Hartree’s intention is to provide relevant training to higher risk staff as appropriate. This training will need to be developed in conjunction with the review of the Hartree compliance programme. 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 compliance programme matures. Any such training will apply to employees based on an assessment of the risk of Modern Slavery, which includes child labour, they encounter in performing their role.

7) Grievance mechanism and remediation

Hartree is committed to the highest levels of ethics and integrity in the way that we do business. We recognize our responsibility to report unethical behavior or voice any concerns. To facilitate this, Hartree established an Ethics Hotline for 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, web and telephone-based 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 2023, there were no complaints which involved allegations related to Modern Slavery. During 2023, 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.

In June 2022, Hartree implemented a Code of Conduct for all employees that sets out minimum expectations for all Hartree employees.

Our Supplier Code of Conduct, introduced during 2023, 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.

8) Next steps

Hartree anticipates taking the following steps to further combat Modern Slavery:

- Continue to build out Hartree’s compliance programme;
- Initiate a more detailed risk mapping exercise of Modern Slavery risk that Hartree has in our supply chains;
- Continue to work with various Hartree teams to develop data that allows us to better assess the risk of Modern Slavery in our supply chains;
- Build out the integration of the Supplier Code of Conduct into our onboarding process;
- Consider the implementation of a supplier due diligence questionnaire to be completed during the onboarding process; and
- Embed into our KYC processes the additional risks inherent in the human rights area.

9) Other relevant information

Beginning with reporting for fiscal year 2023, Hartree Partners, LP will submit a Modern Slavery statement pursuant to the United Kingdom’s *Modern Slavery Act 2015*. Hartree Metals Sàrl currently reports in Australia under the Australian *Modern Slavery Act 2018* and, as of fiscal year 2023, will submit a report in Switzerland pursuant to the *Ordinance on Due Diligence and Transparency in relation to Mineral sand Metals from Conflict-Affected Areas and Child Labour (DDTrO)*.

TABLE 1 – Reporting Entities

| | Hartree Partners, LP | Hartree Metals Sàrl (Hartree Metals LLC) |
|-----------------|---|---|
| Description | Parent company - U.S.-based energy and commodity trading entity | Subsidiary, metals trading |
| Categorization | Entity | Entity |
| Business Number | 83342 6141 | N/A |
| Sector/Industry | Wholesale Trade | Wholesale Trade |
| Location | New York, NY, USA | Geneva, Switzerland |

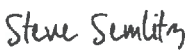
10) Approval and attestation

Hartree Partners, LP

This report is (i) for the entities Hartree Partners, LP and Hartree Metals Sàrl (Hartree Metals LLC) which are subject to the Canadian FLCL as set out in Table 1; and, (ii) has been approved by the Managing Director of Hartree Partners, LP, in accordance with subparagraph 11(4)(b)(i) of the Canadian FLCL.

In accordance with the requirements of the Canadian FLCL, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the reporting entities listed in Table 1. 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 2023 reporting year.

By: Hartree Partners, LP

DocuSigned by:

AE077B232204419...

I have the authority to bind Hartree Partners, LP.

Name: Stephen M. Semlitz


Title: Managing Director

Date: 13 June 2024

Hartree Metals Sàrl (Hartree Metals LLC)

This report (i) is for the entities Hartree Partners, LP and Hartree Metals Sàrl (Hartree Metals LLC) which are subject to the Canadian FLCL as set out in Table 1; and, (ii) has been approved by the board of Hartree Metals Sàrl (Hartree Metals LLC) in accordance with subparagraph 11(4)(b)(i) of the Canadian FLCL.

In accordance with the requirements of the Canadian FLCL, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the reporting entities listed in Table 1. 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 2023 reporting year.

DocuSigned by:

F4F344A0ACB842E...

I have the authority to bind Hartree Metals Sàrl (Hartree Metals LLC).

Name: Pascal Larouche

Title: Managing Officer (Director)

Date: 13 June 2024