

Human Rights and Responsible Sourcing Policy

Effective date: 2026-10-03

1. Purpose and scope

This policy sets out how Systematic Index Partners Ltd., trading as SIP Global ("SIP", "we"), addresses the risk of forced labour, child labour and other serious human rights abuses, and the related sanctions and trade compliance risks, in the commodity markets we quote and trade. It applies to SIP, its directors, employees and contractors, and to every counterparty, supplier, carrier and agent we deal with ("Counterparties").

2. Our commitments

- We do not tolerate forced labour, compulsory or bonded labour, human trafficking, or the worst forms of child labour, as defined by the International Labour Organization conventions, in any goods we buy, sell, rent or arrange to deliver.
- We will not knowingly trade goods produced, in whole or in part, with forced or child labour, or goods whose import is prohibited for that reason under the Customs Tariff (Canada), section 307 of the United States Tariff Act of 1930, the Uyghur Forced Labor Prevention Act, the EU Forced Labour Regulation (EU) 2024/3015 once it applies, or similar laws at the place of delivery.
- We comply with Canadian sanctions law and screen against the sanctions lists of the United States, the European Union and the United Kingdom, as described in our [SIP Standard Terms and Conditions](#).

3. How we assess risk

Many of the commodities we quote are produced in regions or sectors that public sources, including the United States Department of Labor List of Goods Produced by Child Labor or Forced Labor, identify as higher risk. Before we approve a Counterparty for credit or confirm a trade, we consider the commodity, the stated origin, the route to market and the parties involved. Where risk is elevated, we may ask for more information, such as ownership details, origin documentation, certificates or the Counterparty's own supplier policies.

4. What we expect from Counterparties

- Comply with all applicable labour, human rights, sanctions, export control and import laws.
- Not use, and take reasonable steps to ensure their own suppliers do not use, forced labour, trafficked labour or child labour.
- Provide accurate origin and ownership information, and tell us promptly if they become aware of a breach affecting goods traded with SIP.
- Cooperate with reasonable requests for information about the goods and their supply chain.

These expectations are binding on trading Counterparties through section 5 of the SIP Standard Terms and Conditions.

5. When concerns arise

If we have reasonable grounds to suspect that goods or a Counterparty are linked to forced labour, child labour or a sanctions breach, we may decline, suspend or cancel the trade, end the relationship, and report to the relevant authorities. We do not take on new business with a Counterparty while a credible concern is unresolved.

6. Limits of this policy

SIP is a small trading business. We rely on screening, documents and representations from our Counterparties, and we do not audit farms, mills, mines or other production sites. This policy describes our standards and process. It is not a guarantee that any supply chain is free of abuse. SIP is not currently required to file a report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada), the UK Modern Slavery Act 2015 or the Australian Modern Slavery Act 2018, and publishes this policy voluntarily. We will report under those laws if we come within their scope.

7. Raising a concern

Anyone, inside or outside SIP, can raise a concern about forced labour, child labour or other abuse connected to goods we trade by emailing brayden@sipglobally.com. Concerns can be raised in confidence. We will not retaliate against anyone who raises a concern in good faith.

8. Review

We review this policy at least once a year and when our business or the law changes. The effective date above shows the current version.