



ENVIRONMENT, HEALTH + SAFETY (EHS) POLICY

Our EHS Policy

Sims Limited's purpose is to create a world without waste to preserve our planet.

While working to fulfill our purpose, the safety of our employees, suppliers, contractors, and visitors comes before all other considerations. Anyone who visits a Sims site should leave in the same condition in which they entered: free from harm or illness. Sims also strives to protect and preserve the environment in the areas where we operate. The EHS Management System defines the actions we implement to continuously improve as we work toward these aims. While we comply with all applicable environmental, health, and safety laws, we strive to achieve levels of performance that exceed basic compliance requirements.

This policy demonstrates Sims Limited's commitment to health, safety, and environmental excellence and articulates our commitments in these areas – which are incorporated into our day-to-day business operations. This policy applies to and governs the conduct of all directors, officers, and employees within all jurisdictions.

Our EHS Commitments

The success of EHS at Sims Limited will be measured by achieving the following commitments:

- Protecting individuals by providing a safe and healthy work environment and conditions to prevent work-related injury and ill health for all workers, contractors, and visitors. Sims Limited empowers all employees and contractors with the right to refuse unsafe work;
- Conducting our business in a manner that prevents pollution, protects the environment, reduces waste, and promotes the ecologically sound and sustainable use of resources;
- Complying with all applicable safety, health, and environment laws, regulations, standards, and other requirements in all of the jurisdictions where we operate as a minimum but will strive to exceed these levels of performance through standardized best practices and controls;
- Continuously improving all safety, health, and environmental aspects of our operations through measured leading performance indicators;
- Seeking to eliminate hazards and the risk to safety, health, and the environment through the evaluation of all facilities supported by appropriate risk management principles and tools;
- Educating, training, and motivating our employees (including contractors) to conduct tasks in an environmentally responsible and safe manner; and
- Consulting and engaging worker representatives and contractors to ensure effective participation in matters involving safety, health, and the environment.

Our EHS Framework

The framework to achieve the above commitments is our EHS Management System. The system provides the pillars of our EHS strategies, solutions, and programs. The EHS Management Guide details the system structure and how the consistent and focused use of the Sims EHS Management System and associated requirements are achieved through online delivery mechanisms and data capture software, employee training, and EHS tools. Expectations are outlined in EHS Standards and a verification system, which sets clear goals and targets, increases transparency, achieves accountability and improves performance.

This policy and applicable EHS standard requirements and their impact and importance to Sims' business reputation are communicated to all employees, contractors, and suppliers. The document is also publicly available on the Sims Limited website.

This policy will be maintained through periodic review from the EHS & Sustainability Committee of the Sims Limited Board of Directors.

Handwritten signature of Victoria Jones in black ink.

Victoria Jones,
EHS Director - Europe

Handwritten signature of Steven van Wyk in black ink.

Steven van Wyk,
Chief Operating Officer - Sims Metal, UK

JANUARY 2022