



2022
MODERN SLAVERY STATEMENT



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ACKNOWLEDGEMENT

Sims Limited acknowledges the First Nations people of the lands where we live and work. We recognise their continuing connection to land, waters and culture. We pay our respects to their Elders, past and present.

OUR COMMITMENT

Commitment Statement

Sims Limited believes that upholding human rights is vital to ethical business conduct. It drives our development of a responsible supply chain and creation of a safe and fair workplace. We are committed to respecting, promoting, and upholding fundamental human rights as defined in the Universal Declaration of Human Rights and the International Labour Organization Core Conventions on Labour Standards. Our approach to realising those rights is guided by the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

Compliance Statement

This statement, pursuant to section 14 of the Australian Modern Slavery Act 2018 (Cth) and section 54 of the Modern Slavery Act 2015 (UK), sets out the actions taken by Sims Limited,¹ Level 9, 189 O’Riordan Street, Mascot, NSW 2020 Australia, and the entities it controls to address modern slavery risks in our business and supply chain for the financial year ending 30 June 2022 (FY22). The detailed list of Sims Limited’s entities can be found in the Appendix of this report.

¹ This statement is a joint statement on behalf of Sims Limited and Sims Limited Group Australia Holdings Limited in accordance with section 14 of the Australian Modern Slavery Act 2018 (Cth).





CEO STATEMENT ON HUMAN RIGHTS

“

At Sims Limited, we believe that every human being is deserving of respect, and it is our social responsibility to speak up and act on anything that infringes on the rights of another.

”

Alistair Field, Managing Director and Chief Executive Officer, Sims Limited



Watch Mr. Field share the company's Human Rights Statement

OUR COMPANY

About Sims Limited

Founded in 1917, Sims Limited is a global leader in sustainability and an enabler of the circular economy. Our purpose, create a world without waste to preserve our planet, drives us to constantly innovate and offer new solutions in the circular economy for consumers, businesses, governments, and communities around the world.

Our portfolio of businesses includes Sims Metal (metal recycling), Sims Lifecycle Services (IT asset disposition, destruction and decommissioning), Sims Municipal Recycling (curbside recycling), and Sims Resource Renewal (transforming auto shredder residue into useful products).

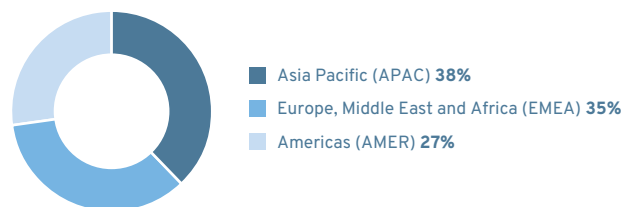
Founded in Australia, Sims Limited is headquartered in Sydney, New South Wales, and, as of 30 June 2022, manages 186 facilities in 15 countries located across Asia Pacific (APAC); Europe, the Middle East, and Africa (EMEA); and the Americas (AMER).

Our Global Workforce

Sims Limited's 4,071-person global workforce is comprised of regular employees, contractors, and temporary/short-term workers. We supplemented our personnel in FY22 with 480 temporary/short-term workers and contractors. We have 22 agents covering Asia Pacific, Europe, South America, and the Caribbean.

Sales to External Customers

Our customers consist of steel mills, smelters, multinational corporations, municipalities, and industrial manufacturers across the globe:



SIMS LIMITED'S BUSINESS DIVISIONS



Returning ferrous and non-ferrous metals to the circular economy, providing an alternative to using new raw materials and their associated environmental impacts.



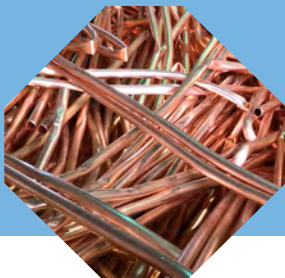
Providing circular solutions for IT hardware by helping businesses redeploy, repurpose, and recycle electronics. This extends their useful life, provides access to technology across the globe, and when function is no longer viable, frees up parts and the precious and rare metals they contain for future use elsewhere.



Providing full-service recycling to urban centers, enabling residents to participate in and contribute to the circular economy while reducing landfill waste.



Utilising innovative technology to divert unrecyclable materials from landfills and convert them into useful products such as clean hydrogen and building materials.




SIMS LIMITED'S MANAGED FACILITIES AND AGENTS BY REGION




Global workforce:

4,071

employees

 = Facilities

 = Agents

FY22 WORKFORCE COMPOSITION

Geographic Region	Total Workforce (#)	Total Workforce (%)	Employees (#)	Employees (%)	Contingent Labour ¹ (#)	Contingent Labour (%)	Contingent Labour as % of Total Workforce
North America	2,291	50%	2,012	50%	279	58%	12%
Australia Pacific	1,032	23%	975	24%	57	12%	6%
United Kingdom and Europe	947	21%	874	21%	73	15%	8%
Global ²	281	6%	210	5%	71	15%	25%
Total	4,551	100%	4,071	100%	480	100%	11%³

1 Temporary labour and others working longer-term in Sims Limited's operations and paid by a third party.

2 Global refers to employees who are supporting the global business.

3 Average percentage of contractors across Sims Limited.

OUR SUPPLY CHAIN

Our Global Supply Network

TRADE

Our trade supply chain is flat and solely consists of metal and IT hardware suppliers, and businesses with whom Sims Limited has contracted to perform part or all the performance obligations of a contract with a customer, referred to here as subcontractors.





Sims Metal's suppliers generally fall into three categories: casual suppliers, scrap dealers, and industrial suppliers. Casual suppliers recover materials from discarded goods. They are usually sole proprietors or family businesses. Scrap dealers, such as auto wreckers, purchase scrap material and resell it with minimal processing. Industrial suppliers, such as tool and die machine shops, sell us the waste of their operations.

Sims Lifecycle Solutions provides circular solutions for IT hardware. The materials we process are supplied primarily by multinational corporations and original equipment manufacturers. We engage subcontractors to help process some of the material.

Sims Resource Renewal has not yet commenced operations.

Sims Limited sold controlling interest in Sims Municipal Recycling during FY22, and it is managed by our joint venture partner at 30 June 2022. Sims Municipal Recycling's suppliers are the New York City Department of Sanitation and the Solid Waste Authority of Palm Beach County, as well as other municipalities where it operates.

SIMS LIMITED'S SUPPLIERS

 SIMS METAL	 SIMS LIFECYCLE SERVICES	 SIMS RESOURCE RENEWAL	 SIMS MUNICIPAL RECYCLING
<ul style="list-style-type: none"> Casual suppliers Scrap dealers Industrial suppliers 	<ul style="list-style-type: none"> Multinational corporations Original equipment manufacturers (OEM) Subcontractors 	<ul style="list-style-type: none"> Not yet commenced operations 	<ul style="list-style-type: none"> Collection service providers



Sims Limited manages

186

facilities across 15 countries

NON-TRADE

Our non-trade supply chain provides goods, services, and equipment across a range of categories in support of our operations and related back-office functions.

NON-TRADE CATEGORY SPEND*



- Transportation and related services 27%
- Building site equipment and maintenance services 11%
- Industrial services 9%
- Manufacturing components and supplies 7%
- Fuels, fuel additives, lubricants and anti-corrosive materials 7%
- Temporary personal and other services 7%
- Engineering and research and technology-based services 6%
- Financial and insurance services 5%
- Material handling and conditioning and storage machinery and their accessories and supplies 5%
- Commercial vehicles and their accessories and components 5%
- Other 12%

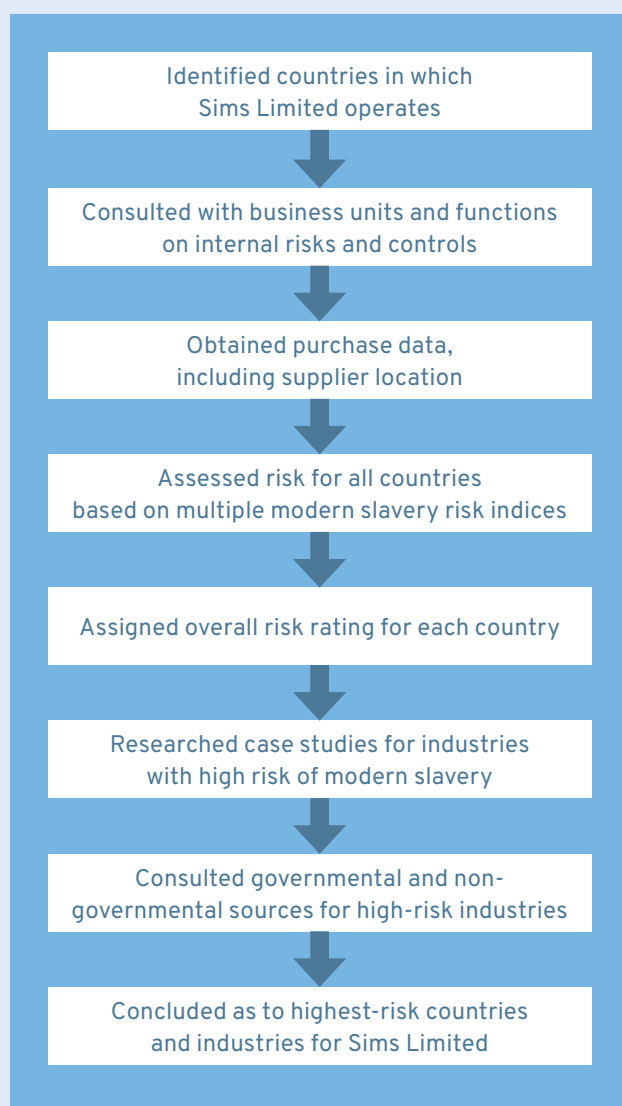
*Does not total 100% due to rounding.

AREAS OF RISK

Risk Assessment Process

We consider both geography and industry when assessing the risks in our global operations and supply chain. We rely on world indices, such as the Global Slavery Index, the International Labour Organization Composite Score, and the Global Rights Index as well as guidance from NGOs, governments, and media coverage. Our methodology for assessing this information remained the same in FY22 as it was in FY21.

MODERN SLAVERY RISK ASSESSMENT



High-Risk Factors

OPERATIONS RISK

Our operations have not changed significantly since last year.

Within our labour force the highest area of risk is associated with the temporary labour we engage to supplement our workforce. The best way we can control this risk is by thoroughly vetting the third-party labour-hire agencies that provide them.

We continue to operate in one country we have assessed as high risk for modern slavery – Papua New Guinea – and are taking ongoing actions to address these risks. (See page 13 for more information.)

SUPPLIER RISK

We have found that the risks identified as being represented by our supply chain remain largely the same as last year.

We spent AU\$9.26 billion with trade and non-trade vendors in 67 countries in FY22. Based on our analyses, 98.76 percent of our purchases are from lower-risk countries. The high-risk countries in which we have current operations and/or suppliers are listed below:

- China
- Hong Kong
- Pakistan
- Papua New Guinea
- Thailand
- Turkey

We have identified high-risk supplier types that are often associated with modern slavery risks of deceptive recruiting, debt bondage, and forced labour:

- Cleaning services
- Computer equipment and electronics
- Construction
- Personal protective equipment and uniform providers
- Security services
- Shipping vessels
- Subcontractors performing work in Sims Limited's name
- Temporary labour agencies/recruiters



98.76%

of purchases are from countries
at lower risk for modern slavery

ADDRESSING CHILD LABOUR RISK IN PAPUA NEW GUINEA

There is a risk of child labour in our workforce in Papua New Guinea because establishing the true age of an employee is difficult. Most residents do not have birth records because they were not born in a hospital. Residents can obtain official identification if they choose, but birthdays are not culturally significant in Papua New Guinea, so the identification will simply reflect the birth date chosen by the applicant.

Our Actions

- We have adopted common sense controls to prevent employing child labour in Papua New Guinea. We assess applicants' demeanor for agreement with their reported age. We also ask context questions, such as how many Christmases they remember or where they were when a significant event happened. If their demeanor or answers leave us with doubt that they are of legal age, we will err on the side of caution and will not employ the individual.
- We have reviewed our labour force in Papua New Guinea and do not believe there are any instances of child labour. Papua New Guinea's Employment Act 1978 establishes a minimum working age of 16. Our youngest employee is 28 and the average age overall is 41.



AGENTS

In FY22, Sims Metal had 22 agents working to identify business opportunities for Sims Metal globally, nine of whom provide coverage in at least one of the following high-risk countries by region:

EMEA

Egypt
Turkey

APAC

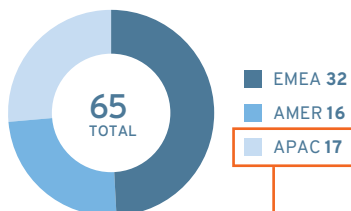
China
Pakistan*
Thailand

* Pakistan had previously been reported as part of EMEA, but we now consider it to be part of APAC.

SIMS LIFECYCLE SERVICES SUBCONTRACTORS

In FY22, Sims Lifecycle Services maintained relationships with subcontractors as follows.

SUBCONTRACTORS BY REGION:



HIGH-RISK COUNTRIES

THAILAND – 1
CHINA – 2
HONG KONG – 4

CHARTERED VESSELS

VESSELS

In FY22, Sims Metal screened

194

bulk vessels between 1 July 2021–30 June 2022 (FY22)

TRADE

The primary modern slavery risks posed by our trade suppliers are the use of forced or child labour and paying less than fair wages. These could manifest differently depending on the supplier's size, but size alone is no guarantee they do not exist. Our casual suppliers are self-employed individuals who often appear to be helped by friends or family members. The suppliers could be controlling these "helpers," forcing them to perform manual labour and paying them little or nothing.

Dealers, industrial suppliers, and landfills are generally larger in size with more employees, but they too could be using forced or child labour, either directly or indirectly through contracted labour. They could be systematically paying less than a living wage or causing people to work unreasonable hours in unhealthy and/or unsafe conditions.

The original equipment manufacturers and multinational corporations that supply materials for our Sims Lifecycle Services business are subject to a high level of scrutiny due to their global profiles but still may harbour these and other human rights issues in their operations and supply chains.

NON-TRADE

Our non-trade supply chain is diverse in its nature and tends to mirror our operations with regard to geographies.

Some of our non-trade suppliers also may be a source of increased risk due to the nature of their workforce or the distance from Sims Limited at which they operate.

They may utilise workers who are unskilled, unseen, or unable to communicate well. These traits make workers vulnerable to modern slavery, including forced labour. Temporary labour providers, cleaning services, those who produce personal protective equipment and uniforms, those who supply construction and maintenance services, and the vessels we use to transport our export materials may utilise workers with some or all these traits (e.g., those not highly skilled, migrants, and culturally and linguistically diverse people from low-income backgrounds).

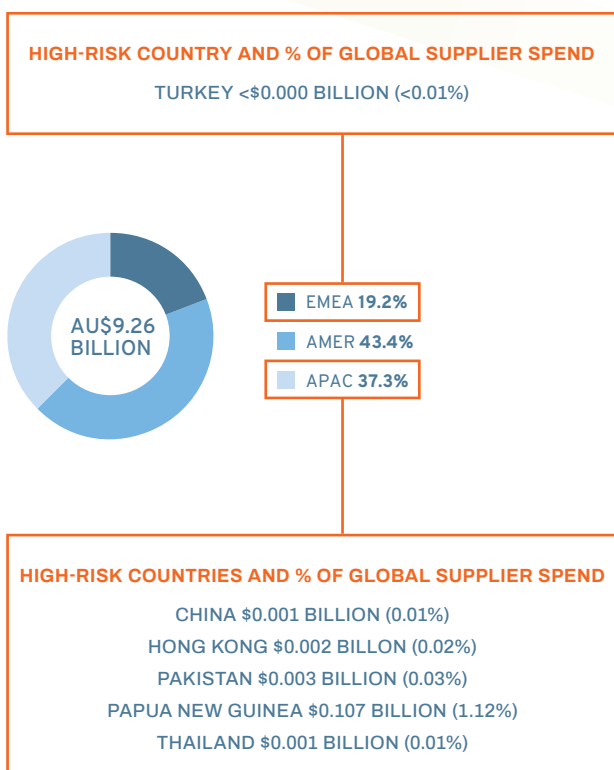
Other vendors present a risk due to the distance at which they operate from our oversight. Lack of visibility can allow them to infringe on the human rights of their workers by physically controlling their movement, retaining workers' personal identification, and use of violence. These vendors include e-recycling subcontractors, and the vessels we charter for transporting bulk cargo. Lack of oversight may also increase the risk of unethical behavior such as bribery and corruption, which may contribute to the conditions that promote modern slavery. This is of specific concern where our agents are concerned.

Customer Risk

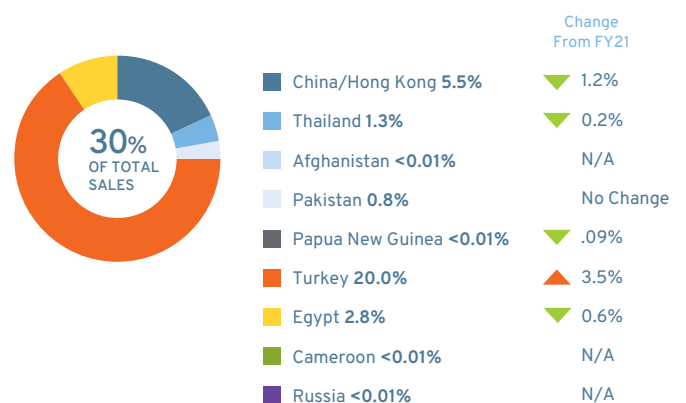
As with our trade supply chain, we perceive the most significant risk of modern slavery derives from customer location.

In FY22, our sales to customers in high-risk countries represented 30 percent of our total sales, up from 27 percent of our total sales in FY21. The increase was largely attributable to an increase in sales to Turkey.

FY22 SUPPLIER SPEND



FY22 SALES TO HIGH-RISK COUNTRIES



Values do not total 100% due to rounding.

OUR ACTIONS

Governance

CORE VALUES

Sims Limited's core values reflect our commitment to ethical behavior including protecting human rights. A key priority for Sims Limited is protecting the safety of our personnel and visitors to our properties. We conduct our business with integrity while respecting each other and the communities in which we operate. We strive for excellence as we pursue initiatives that support our social responsibility agenda, transparently reporting on our progress and challenges in our journey.

STRUCTURE

Sims Limited knows that it is not enough to stay abreast of developments around human rights, such as safety in the workplace, fair wages, and equal treatment. We also must have effective mechanisms in place to embed compliant behavior into our culture. This is made possible through strong leadership, centralised focus, detailed guidance, accessible training, and reinforcement.

Our Board of Directors oversees the global governance of human rights at Sims Limited. The responsibility for designing and implementing minimum standards via policies, procedures, and training that protect human rights is entrusted to the chief executive officer and his team. Group Human Resources addresses labour-related human rights including fair wages, collective bargaining, and equal opportunity employment. Group Risk and Compliance focuses on the non-labour elements, including physical and environmental safety, social license, sustainability, and modern slavery. Functional leadership embeds practices compliant with these human rights-related policies and procedures into day-to-day activities. Internal Audit and Global Ethics and Compliance periodically assess the effectiveness of human rights-related controls. Managers at all levels are expected to always lead by example.

Policies

HUMAN RIGHTS GOVERNANCE

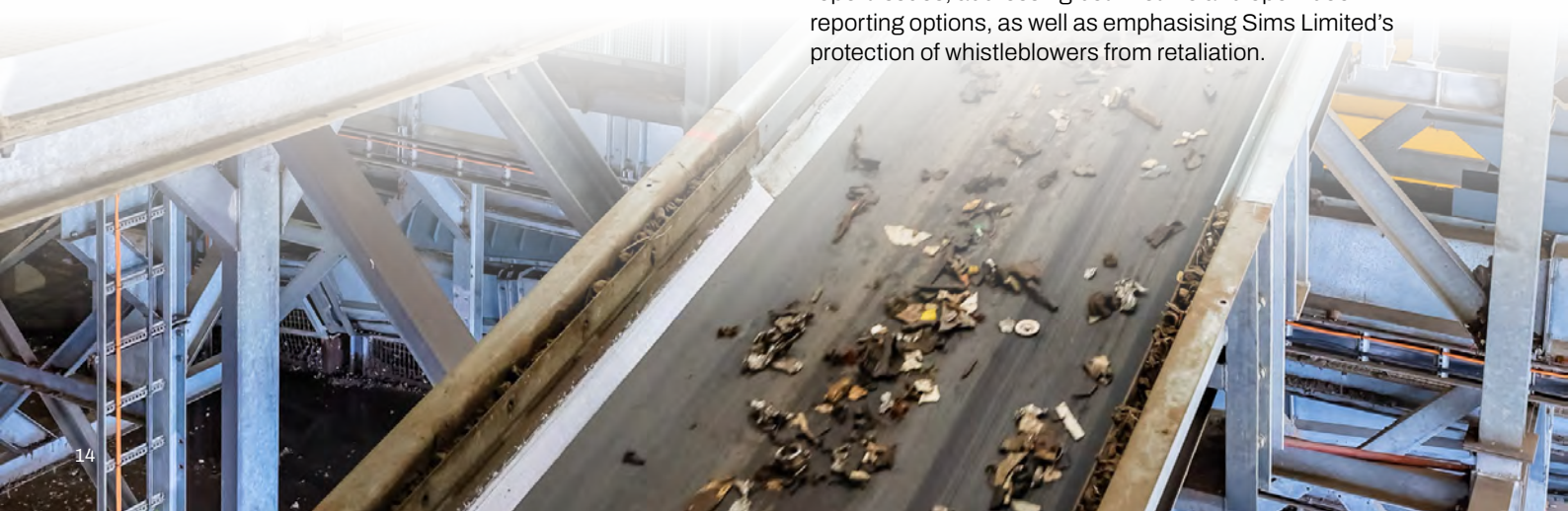
Our approach to protecting human rights begins with Sims Limited's [Human Rights Governance Policy](#), which outlines our commitment to respect and uphold fundamental human rights in the way we conduct business. These rights are set out in the Universal Declaration of Human Rights and further defined for business in the United Nations Guiding Principles on Business and Human Rights and in the International Labour Organization Core Conventions on Labour Standards.

CODE OF CONDUCT

Our [Code of Conduct](#) communicates to our employees our commitment to human rights. This includes the protection of rights for employees, including:

- The right to equal opportunity and non-discrimination, regardless of ethnicity, gender, religion, age, sexual orientation, health status or other such protected classifications;
- The right to personal security, including protection against improper and unlawful harassment, as well as against retaliation for employees who report non-conformance with government regulations, company policies and codes of conduct;
- The right to a safe and healthy workplace for every employee, regardless of status;
- The right to competitive remuneration;
- Freedom of association; and
- All other legal rights in respect of the workplace granted to our people in the regions in which we operate.

Our employees are trained in our Code of Conduct during onboarding, reinforced by annual training. We strive to keep employees engaged by highlighting key topics on a rotational basis. The training always reinforces how to report issues, addressing both hotline and open-door reporting options, as well as emphasising Sims Limited's protection of whistleblowers from retaliation.





OUR CORE VALUES



SAFETY

Safety will always be our first priority. We believe that all injury incidents are preventable, and we are committed to a goal of zero injuries.



INTEGRITY

We conduct all business with integrity and adhere to the highest standard of ethical business conduct.



RESPECT

We will treat each other, our customers, visitors, and community members with respect and dignity.



TRANSPARENCY

We ensure a sense of appropriate transparency in everything we do.



EXCELLENCE

We commit to excellence in everything we do and champion continuous development and sharing of best practices across the company.



SOCIAL RESPONSIBILITY

We aim to be the world's safest and most responsible recycling and recovery company.



SIMS LIMITED HUMAN RIGHTS RESPONSE COUNCIL

Sims Limited's Human Rights Remediation Process establishes a Human Rights Response Council, comprised of our Group's chief risk and compliance officer, chief human resources officer, chief general counsel and secretary. For each allegation, the Council is charged with creating, supporting, and empowering a Response Team with appropriate skills based on the circumstances. The Response Team investigates the allegation, coordinates efforts to remediate the harm done, and conducts a root cause analysis. The Council ensures the Response Team has the support needed to do so effectively.

Key to the process is stopping the impacts as soon as possible, returning those impacted to a state as close as possible to that which they were in prior to the impacts, and consulting with those impacted on how best to provide remediation where practical.

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

A primary purpose of any government should be to protect its citizens, including those who are vulnerable. Bribery and corruption inhibit legitimate and fair governance by removing protections from those who most need it and by shifting the efforts of the governmental bodies from representing the best interests of the people to representing the best interests of specific individuals. Those who lose protection become more vulnerable to modern slavery and its attendant abuses.

Sims Limited's [Anti-Bribery and Anti-Corruption Policy](#) clearly lays out our expectations that our employees conduct business ethically, without resorting to bribery or corruption. The policy supports Sims Limited's compliance with applicable regulations while also reflecting our

determination to support justice. The policy includes examples of what behaviors contributing to bribery and corruption might look like at Sims Limited, and how our employees should respond if they are faced with it.

WHISTLEBLOWER POLICY

Our [Whistleblower Policy](#) affirms Sims Limited's commitment to maintaining an open working environment in which individuals can report instances of unethical, unlawful, or undesirable conduct without fear of intimidation or reprisal. It outlines our investigation process and the protections available to those with the courage to speak up, including Sims Limited's refusal to tolerate retaliation against those who do.

FY22 Improvements

WHISTLEBLOWER POLICY

We updated our Whistleblower Policy to keep Sims Limited's global approach consistent with best-in-class practices across the world, including recent changes in the European Union. Key changes included committing to acknowledging reports within seven days and providing an update within 90 days when the reporter can be contacted; emphasising the ability to report anonymously; and reinforcing Sims Limited's commitment to confidentiality when a reporter's identity is known. We also reminded employees that if they ever felt they were being retaliated against because they had reported a concern or cooperated with an investigation, they should contact Global Ethics and Compliance for help.

HUMAN RIGHTS REMEDIATION

Sims Limited may not be able to prevent all negative human rights impacts in our operations and supply chain. Recognising this, we identified the need to position the company and our personnel to respond swiftly and effectively to allegations of negative impacts to human rights in Sims Limited's operations and supply chain.

We enlisted the aid of modern slavery experts to develop global guidance and mechanisms supporting a quick and effective response should we learn of such possible impacts. To that end, we created our Human Rights Remediation Process Policy.

The policy establishes both the authority and guidance needed for effective response. The authority is imbued in our Human Rights Response Council, which is comprised of business leaders with the necessary skills and authority to properly oversee the process. The guidance outlines the necessary elements for effective investigation and remediation.

Addressing Operational Risks

GRIEVANCE MECHANISMS

Sims Limited provides multiple channels of reporting so employees may use the one with which they are most comfortable. They can speak to their line manager, Human Resources, or other members of management locally. They also may report to resources at the Group level, including Global Ethics and Compliance, Legal, Human Resources, and the chief executive officer. These reports may be made in person or via post, email, telephone, or through our independent hotline. The independent

hotline is available to Sims Limited's employees, agents, contractors, consultants, partners, customers, suppliers, visitors, shareholders, and other affected persons.

We increase the accessibility of our hotline service by making it available in all operating regions in the local languages, and facilitating anonymous reporting. We promote our hotline at our facilities and offices by posting the contact information in areas frequented by employees, visitors, and service providers. We also include our hotline information in our Supplier Code of Conduct.

Sims Limited's Global Ethics and Compliance function oversees reports and their investigations. When a report is filed, the case is assigned to an investigator based on its nature and scope within regulatory requirements. All reports are investigated, and where the identity of the reporter is known it is treated with utmost confidentiality.

FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVELY BARGAIN

Freedom of association and the right to collectively bargain provide employees an additional voice in our company and increase their bargaining power, enabling advocacy. It also provides additional protection from retaliation.

In Sims Metal Australia and New Zealand, and Sims Metal North America, 34 percent and 44 percent of employees, respectively, are under collective bargaining agreements.

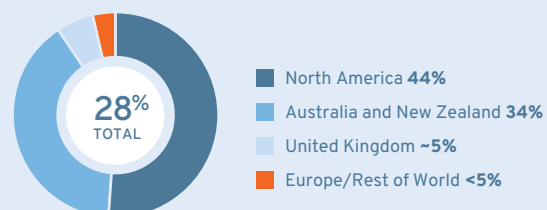
Our European workers are free to be represented by works councils and/or unions without obligation to report or inform their decision to the company. Given the levels of voluntary disclosure, we estimate approximately a 5 percent representation among our UK employee population and less than 5 percent representation for the rest of Europe.

Overall, we estimate that approximately 28 percent of our global workforce is represented by these labour agreements.

DIVERSITY AND INCLUSION

One of the best ways to combat modern slavery is to make the same opportunities and benefits available to everyone. We developed a five-year diversity, equity and inclusion strategy with the support of our executive leadership team. In 2022, we achieved the target of at least 25 percent of women in senior leadership roles and are working on addressing the gender pay gap.

PARTICIPATION IN OR REPRESENTATION BY COLLECTIVE BARGAINING AGREEMENTS AS PERCENTAGE OF TOTAL EMPLOYEES IN EACH REGION



FY22 Improvements

HUMAN RIGHTS AWARENESS

In FY22, Sims Limited determined that training our employees on human rights issues, including modern slavery, should occur annually but may be targeted to specific groups, based on risk. At a minimum, all employees will receive training every three years to promote continuing awareness.

Additionally, in FY22, we administered targeted training to those who were best positioned to identify, detect, and prevent modern slavery due to their roles. This included operations management, Human Resources, Procurement, Security, and others, representing 16 percent of the employee population. The training reinforced what modern slavery is and how to spot it, as well as how to respond when you suspect it is happening. It also provided detailed case studies using real-world situations and discussed how modern slavery could happen in our operations or supply chain. The training was completed by 100 percent of those assigned it.

PAPUA NEW GUINEA

Sims Limited's risk assessment process has identified Papua New Guinea as a country that poses a higher risk of modern slavery. This is the only high-risk country in which Sims Limited maintains operations, and we are sensitive to the impact it could have on our workforce and have continued to focus on local outreach. Through internal engagement, we found because the FY21 training was delivered only in English and included scenarios that were not relevant to the local audience, the training was not as effective as desired. In FY22, we worked with local leadership and human resource teams to increase the relevance and accessibility to the employees, including translating it into the local dialect, Tok Pisin.

EMPLOYEE ENGAGEMENT

In FY21, Sims Limited administered a global employee engagement survey. The survey asked employees to rate their comfort level on knowing how to file a report, their level of trust that they can file anonymously, and their trust that Sims Limited will prevent retaliation. The weighted average score of 3.75 on a 5.00-point scale indicated a reasonable level of understanding, with room for improvement.

In FY22, we emphasised these elements in our annual Code of Conduct training, including a screen shot from the hotline system of what it looks like when a reporter has chosen to remain anonymous.

We leveraged Sims Limited's Compliance Month to reinforce these concepts.

Compliance Month content also highlighted information on anti-competitive practices, unconscious bias, the importance of accurate books and records, and conflicts of interest including gift giving.

GRIEVANCE MECHANISMS

Sims Limited has been tracking hotline and open-door reporting for many years. However, where hotline reports are captured regardless of outcome, open-door reporting has always been limited to only those reports that were substantiated. In FY22, a team led by Global Ethics and Compliance working with Human Resources agreed that all significant open-door reports would be captured going forward. Significant reports are those related to:

- Discrimination, harassment, and sexual harassment
- Wages and hours abuses
- Environmental issues
- Trade/customs
- Misappropriation of company assets
- Bribery or corruption
- Books and records issues
- Undisclosed conflicts of interest
- Inappropriate disclosure of confidential information
- Inappropriate gifts and entertainment
- Misuse of company assets or services
- Abuse of power
- Workplace violence or threat of violence
- Controlled substance abuse
- Third-party complaints
- Bullying, abusive language or actions by supervisors and managers
- Retaliation when these behaviors have been reported

These guidelines should be fully in place for FY23 and beyond.

OFFERING TRAINING IN THE LOCAL DIALECT

Our Global Ethics and Compliance team worked with local leadership and human resource teams serving Papua New Guinea to tailor the FY22 Code of Conduct and Modern Slavery Awareness training courses for those employees.

The refined content was incorporated into the presentation in both English and Tok Pisin. It was also narrated in Tok Pisin by a native speaker. Having the content in both languages side-by-side facilitates understanding and communication between employees with these different primary languages.



TRAINING EMPLOYEES WITH REAL-WORLD CASE STUDIES

This year's modern slavery training described instances of real-world abuses in the recycling industry in the United Kingdom.

Three men and one woman were arrested for allegedly running a slavery ring in the West Midlands of England that exploited 11 men in September 2016. The workers reportedly worked shifts of up to 12 hours for GBP10 per shift. When rescued, they were malnourished, and one had a badly injured shoulder that had not received medical treatment.

Four men in Newcastle ran a GBP £1 million operation between June 2014 and September 2016 that systematically brought workers over from their native country with the promise of well-paid work, then housed them in squalid conditions and forced them to work in local recycling plants. The gang signed the men up for bank cards then stole them, allowing them access to the men's wages.

A gang of 10 men and women trapped approximately 350 victims from the Polish community into slave labour in the West Midlands, England. The workers were isolated, housed in crowded and unsanitary conditions, and controlled through threatened and actual violence and humiliation. The gang worked with a British co-conspirator to secure legitimate employment at a local recycler, amongst other businesses, then stole the men's wages, estimated as totaling GBP £2.46 million between June 2012 and October 2017.

By highlighting actual cases of slavery in the recycling industry, we showed our employees how close modern slavery may be and how it could happen at Sims Limited if we are not diligent.

DIVERSITY AND INCLUSION

Sims Limited launched the first cohort of its Women Leading @ Sims development program. This program is specifically designed to support the unique learning opportunities of women leaders across all business divisions. The initiative was developed in response to learnings from the Women Working @ Sims focus groups, which were held previously to better understand the needs of female employees.

The response to this first year of our program was very positive and a second cohort is scheduled for FY23.



~200

vessels screened for modern slavery risks in FY22

Addressing Supply Chain Risks

Sims Limited currently approaches detecting and preventing modern slavery in our supply chain through communicating our expectations and conducting due diligence.

SUPPLIER CODE OF CONDUCT

To accomplish our purpose, it is important that we partner with companies that have similarly aligned priorities. Together, we can continue to develop sustainable performance throughout our supply chains.

Our [Supplier Code of Conduct](#) communicates to those with whom we conduct business our minimum expectations with regard to ethical behavior, regulatory compliance, and protection of human rights.

Due Diligence

NEW VENDORS

New supplier due diligence varies across the company and between trade and non-trade. It includes validating the entity's existence and legal state. Additional due diligence steps are tailored to the needs of the company and may include facilities visits, and website and location validation as well as critical questions concerning labour practices.

We are currently implementing an enterprise resource planning system that will facilitate more consistency in our approach. This will create opportunities to improve our processes to identify, address, and prevent human rights violations, including modern slavery risks in our operations and our supply chain.

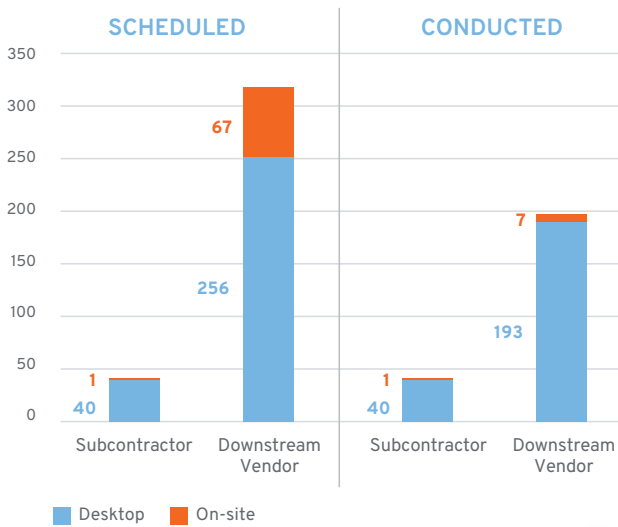
We charter vessels to transport bulk materials to our international customers. These vessels are screened using a third-party platform that identifies the countries of ownership and operation, the registered and beneficial owners, commercial operators, technical managers and if there are any European Union, Her Majesty's Treasury (UK), Office of Assets Control (OFAC) and OFAC Non-Specially Designated Nationals (SDN) sanctions against these parties or the vessel. We include our customers in this selection process so they may determine if the vessel meets their standards as well. In FY22, we screened 194 vessels. Not all vessels were booked, but when they were not, it was due to contractual restrictions or timing issues, not due to adverse information.



SUBCONTRACTORS AND DOWNSTREAM VENDORS

Sims Lifecycle Services performs vendor audits annually through a combination of desktop and on-site audits. These audits cover subcontractors, logistics providers, and downstream service providers. The cadence of on-site versus desktop audits is based on risk factors, including data privacy, environmental impact, materials value, and certification levels.

This cadence establishes the audit goals each fiscal year. In FY22, this consisted of:



Sims Lifecycle Services prioritised the scheduled subcontractor audits in FY22 and 100 percent were completed. Multiple elements prevented us from completing all the downstream vendors audits, particularly recurring and unpredictable travel restrictions. The pandemic also caused delays to the desktop audit program due to downstream vendor personnel being unavailable and consequent delays in obtaining responses. Overall, we were able to complete 66 percent of the scheduled audits in FY22.

Travel restrictions and COVID-19 considerations meant we focused on desktop reviews over on-site audits again in FY22. Due to the uncertainties around the ability to travel in future, we are reassessing our audit cadence to make the most effective use of our resources and address risks.

AGENTS

As part of our efforts to prevent causing or contributing to practices of modern slavery, we screen and train the agents we use. Agents are thoroughly vetted via a third-party system for possible sanctions as well as risks of corruption prior to contracting their services. We provide them with our Code of Conduct and provide in-depth training on key risk areas such as bribery and fraud. They are required to acknowledge their understanding of our Code and their obligation to comply with it. We periodically recertify our agents to ensure they continue to meet our standards.



FY22 DOWNSTREAM VENDOR AND SUBCONTRACTOR AUDITS

FY22 Improvements

LABOUR PROVIDERS

Our temporary labour force represents the largest number of people who could be impacted by high-risk suppliers. Sims Limited utilises temporary labour across all regions and seeks assurance that our partners are providing us with these individuals in a fair and ethical manner. In pursuit of this assurance, Sims Limited began a long-term project in FY22 to understand how they protect human rights and prevent abuses in their supply chain.

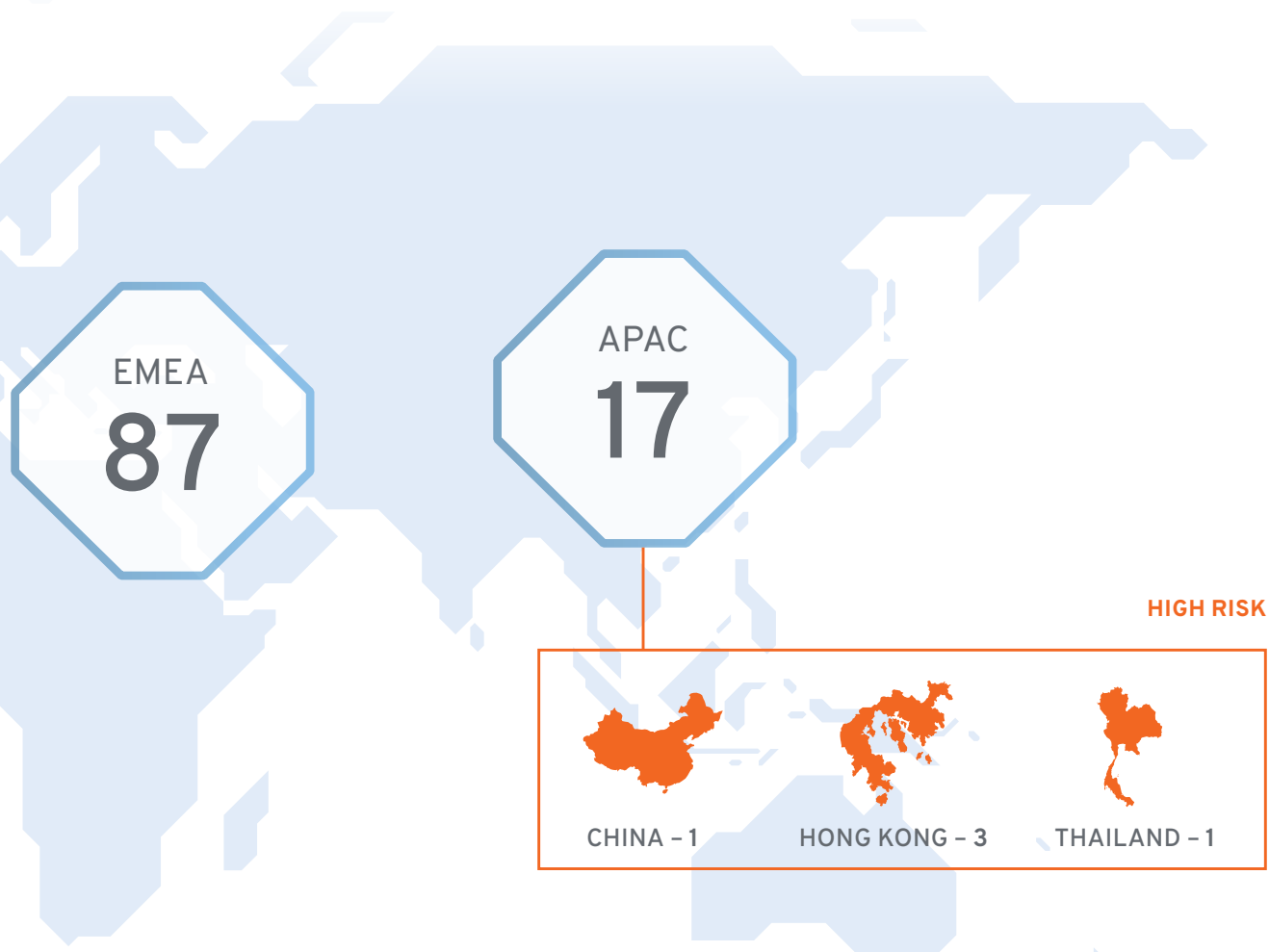
In FY22, we launched the first phase of this program by identifying the population of providers currently in use, and the terms and conditions in the agreements governing our relationships with them.

LABOUR PROVIDERS BY REGION (NONE ARE IN HIGH-RISK COUNTRIES)



HIGH-RISK DUE DILIGENCE

In FY22, we refined the due diligence steps, based on feedback from our FY21 pilot. We then rolled out these additional due diligence steps for new high-risk suppliers across our largest division, Sims Metal. The additional due diligence includes screening businesses/entities against a third-party platform that contains information on sanctions, fines, and adverse media. We also require vendors to complete a self-assessment questionnaire around controls they have in place to protect human rights. Each region designated a person responsible for embedding the process, and Global Ethics and Compliance trained these individuals on the purpose of the new steps and how they will contribute to a fairer and more equitable world. The training also covered how to screen entities and individuals, and helped to identify the points of contact for escalation as needed. Global Ethics and Compliance will provide ongoing support to this process.



ASSESSING EFFECTIVENESS

Sims Limited has established multiple mechanisms for monitoring the effectiveness of our efforts to combat modern slavery. These include accountability to the Board of Director's Safety, Health, Environment, Community and Sustainability Committee including periodic reporting, the establishment of key performance indicators (KPIs), investigation and analysis of complaints and grievances, and the review and assessment of due diligence outcomes and audits.

KPIs

We established KPIs to assess our effectiveness in combating modern slavery. They include:

- Tracking the number of employees who have completed the Code of Conduct and targeted human rights training;
- Reporting on the outcomes of Sims Limited's additional due diligence procedures for high-risk suppliers;
- Tracking the number, type and outcome of audits conducted at subcontractors and downstream vendors;
- Tracking the number and type of grievance reports received, the outcomes, and the resulting disciplinary actions where applicable; and
- Tracking employee perceptions of Sims Limited's ethical culture via biennial employee engagement surveys.



² As discussed under FY22 Improvements Addressing Operational Risks, open-door reports have traditionally been limited to only those that have been substantiated. As such, the percentage substantiated value is limited to our hotline cases as a better representation of outcomes.



TRAINING

Training is critical to understanding and managing modern slavery risk. In FY22, 100 percent of our active employees completed our Code of Conduct training, and 100 percent of the targeted employees completed modern slavery training. Both courses required a passing grade of at least 80 percent on the comprehension quiz.

NEW VENDOR DUE DILIGENCE OUTCOMES

There were no new vendors who failed to pass due diligence procedures, including the additional due diligence procedures applied to high-risk new vendors. Three cases were escalated for further consideration due to red flags, but all were able to be resolved.

GRIEVANCE REPORTING

Sims Limited received 111 grievance reports via the hotline or open-door reporting in FY22. Of these, 58 percent were substantiated.

EMPLOYEE ENGAGEMENT SURVEY

We currently administer our employee engagement survey every two years. It was last administered in FY21. In FY22, we focused on improving employee confidence in being able to report anonymously, and in being protected from retaliation. In the future, these questions will be asked again to assess the effectiveness of these targeted communications.

See *Employee Engagement* under FY22 Improvements Addressing Operational Risks for more details on the steps we took in this area.

FURTHER ACTIONS

Improving Governance

HUMAN RIGHTS REMEDIATION PROCESS POLICY

In FY23, we will submit our proposed Human Rights Remediation Process Policy for review by the Board of Directors. Once approved, we will publish the policy and promote awareness of the process in our annual human rights training.

Addressing Operational Risks

SOCIAL LICENSE TO OPERATE

In FY23, we will continue to improve our processes and systems for community involvement. We anticipate this will include identification of community stakeholders, internal and external engagement via focus groups with employees and communities, and community impact assessments.

HUMAN RIGHTS REMEDIATION PROCESS IMPLEMENTATION

As drafted, our Human Rights Remediation Process requires us to have personnel specifically trained in handling significant human rights allegations on our response teams. We will partner with third-party experts to provide training and related tools for both potential investigators and the Human Rights Response Council members.

Addressing Supply Chain Risks

TEMPORARY LABOUR PROVIDER STANDARDS

We will move on to Phase 2 of our Temporary Labour Provider Standards project, which focuses on developing minimum standards we require in our partners with regards to preventing and detecting modern slavery in their operations and business partners. It will be informed by our analysis of existing terms and conditions, as well as benchmarking and consultation.

ADDITIONAL DUE DILIGENCE

We will complete the roll out of the additional due diligence procedures for new high-risk vendors by working with Sims Lifecycle Services to cover its operations. Sims Lifecycle Services is comprised of smaller facilities spread across a larger geography than Sims Metal. Processing of new vendors is not centralised as it is in Sims Metal, so we are working closely with the local teams to structure responsibilities so the additional steps can be properly supported with available resources.

Addressing Stakeholder Engagement

SUBCONTRACTOR ENGAGEMENT

Our Global Ethics and Compliance function will work with Sims Lifecycle Services' Subcontractor Relations function to identify opportunities to engage with our subcontractors around modern slavery and other human rights issues.





FY23 HUMAN RIGHTS PRIORITIES

Governance



Submitting **Human Rights Remediation Process Policy** for Board review



Identifying **community stakeholders** and conducting **community impact assessments** to improve community involvement



Partnering with third-party experts to provide **training and tools** for our Human Rights Response Teams

Supply Chain



Developing **minimum standards for temporary labour providers** to prevent and detect modern slavery



Rolling out **additional due diligence procedures** for high-risk vendors at Sims Lifecycle Services

OTHER RELEVANT INFORMATION

Working with External Stakeholders

Our CEO continued his participation in the World Business Council for Sustainable Development and its Call to Action for Business Leadership on Human Rights to support and promote the realisation of human rights for all.

We are committed to the prohibition and elimination of child, forced, and compulsory labour throughout the communities in which we operate. Our human rights policy reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to avoid purchasing products that rely on inappropriate labour processes.

FY22 Improvements

United Nations Global Compact

Sims Limited became a proud signatory to the United Nations Global Compact in FY22 and began participating in Australia's Global Compact Network. We joined the Australian Modern Slavery Community of Practice, which helps businesses understand and discuss new developments around modern slavery, as well as network with other members to share and leverage lessons learned.

Business Ethics Leadership Alliance

Sims Limited also joined Ethisphere's Business Ethics Leadership Alliance (BELA). This is a community of companies around the world that are focused on working together to help drive ethical practices in our businesses and supply chains. The Alliance includes roundtable events exploring and sharing new ideas and practices;

sharing of surveys, forms and other tools supporting these initiatives; presentations by internal and external subject matter experts to help members stay informed; and forums and online discussions for informal connections and sharing.

Social License

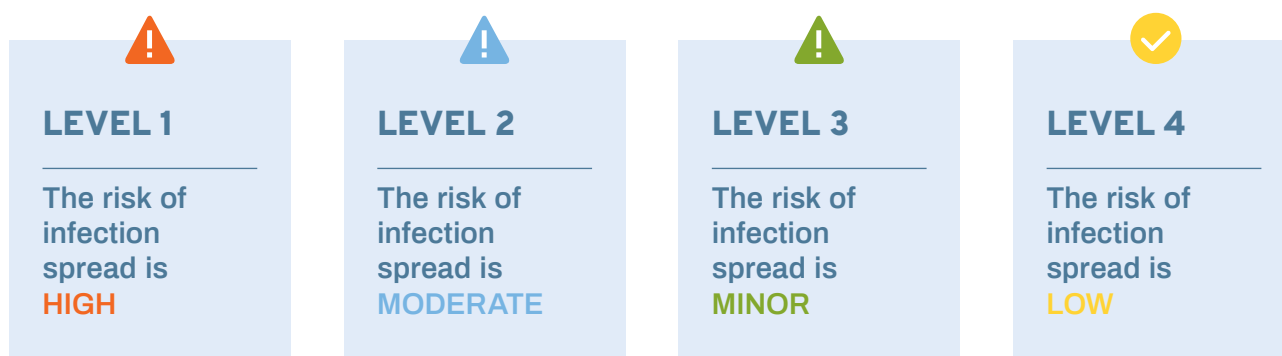
In FY22, Sims Limited recognised the need to continue to invest in processes and systems relating to social license. Our group chief risk and compliance officer is the executive sponsor of this initiative. A working group consisting of our global director of government, stakeholder and community engagement, director of corporate sustainability and corporate responsibility, and global head of risk was created to lead efforts in this area for FY23.

Impact of COVID-19

COVID-19 continued to present a challenge in FY22, but the impact of widespread vaccination enabled Sims Limited to achieve flexibility and stability in operations despite the emergence of new variants globally.

Our Business Continuity Plan was modified in January 2022 leveraging guidance from COVID-response leadership such as the United States Centers for Disease Control and Prevention. Sims Limited incorporated a matrix that identified mandatory controls to be in place based on risk levels. This matrix approach empowered regional leadership to adjust their approach to address local situations and quickly responding to changing conditions in a manner that met Sims Limited's low-risk appetite when it comes to the health and safety of our employees and visitors at our facilities.

MANDATORY CONTROLS IDENTIFIED BASED ON COVID-19 RISK LEVELS





FY22 ACTIONS



Became UN Global Compact signatory



Joined the Australian Modern Slavery Community of Practice and Ethisphere's Business Ethics Leadership Alliance

We continue to offer the possibility of remote work where practical, as well as maintaining access to traditional workspaces for those for whom remote work is not an option.

Sims Limited is aware the COVID-19 pandemic continues to have a serious impact on the health and livelihoods of people across the globe. While we have taken steps to address the risks within our operations, we remain committed to helping to reduce these impacts where we can.

Malaysian Rubber Gloves

Malaysian rubber glove manufacturers like Top Glove have been alleged to be using forced labour and debt bondage. These manufacturers rely on migrant workers from India and Bangladesh. The workers may have to pay heavy recruitment fees to obtain these positions, and once in Malaysia, they are often forced to work long hours for very little pay, while living in squalid conditions.

Sims Limited's standards for personal protective equipment addresses the need for hand protection that is appropriate to the task based on a risk assessment and standard operating procedures. Generally, these require the use of cut-resistance and flame-retardant gloves due to the nature of our operations rather than thin rubber or latex gloves such as those supplied by Top Glove. Low-volume uses include handling chemicals (where specified

by material safety data sheets) or in first-aid kits, but any purchases are minor.

Russian Invasion of Ukraine

Russia's invasion of Ukraine on 24 February 2022 caused more than 9.9 million Ukrainians to flee the country, and a third of its population to be displaced as of 30 June 2022. The invasion caused losses in employment, housing, and health care, and separated children and vulnerable people from their families and caretakers. It also caused turmoil in global food and energy markets, increasing costs for these vital basics. These elements create greater opportunity for modern slavery to thrive.

Sims Limited denounces the actions of the Putin Administration and condemns their violation of international law. As such, we have made the decision to refrain from conducting business with Russia and Russian entities.

Sims Limited donated AU\$200,000 to UNICEF for immediate humanitarian aid and launched an appeal to raise additional funds for those affected by the conflict in Ukraine. UNICEF has been on the ground in Ukraine and neighboring countries providing essential food, water, medicine, and safe shelter for refugees.

The Sims Lifecycle Services team based in Bydgoszcz, Poland, also has rallied to assist Ukrainians seeking refuge in that country. The team collected goods, including food, clothes, and toys at the facility, and donated both goods and money to a local organisation, Polish Humanitarian Action, which coordinated relief on the ground.

Sims Limited established subcontractor relationships in Russia and Ukraine beginning in 2015 to support requests from its customers for processing of information technology equipment in these countries. The volume of activity with the subcontractors has been driven by our customers' requests and do not include contractual minimum volumes.

Like Sims Limited, our customers have chosen to cease activities inside Russia to avoid even the appearance of support for Russia's actions. Only existing materials already in process at the Russian subcontractor, consisting of 334 items, were handled after 24 February 2022.

Sims Limited recognises the loss of business might have a negative impact on the workers at both subcontractor facilities. If the loss of volume leads to layoffs and closures, the resultant loss of income and health care could leave these workers and their families vulnerable to modern slavery. While support exists for the Ukrainians who have been impacted, there is little help being offered within Russia to those who are being impacted indirectly.

We have confirmed the Russian subcontractor business continues to operate as of 30 June 2022.

We cannot estimate the impact of the loss of Sims Lifecycle Services' volume as we do not have access to information that could provide such insights, such as changes in the volumes processed, overall revenue, or number of employees. Use of this business in the future is contingent on de-escalation of the conflict, economic sanction regimes, and customer demand for processing in this country.

We have received one request from a customer for processing of electronic equipment in Ukraine and, as of 30 June 2022, confirmed this subcontractor was still operating. Sims Lifecycle Services is currently awaiting the customer's direction about this disposition.

Consultation

Assessing Sims Limited's operations and supply chain for modern slavery risks involves cross-functional dialogue involving Global Ethics and Compliance, Corporate Sustainability, Human Resources, Finance, Procurement, Risk and Operations.

Those who directly lead our businesses, as well as those who lead the functions that support them across the company, participate in our executive leadership team, headed by our chief executive officer and managing director. The team and our Board of Directors are kept apprised of our modern slavery efforts throughout the year and were engaged in the drafting and review of this statement.

Our Global Ethics and Compliance function, which leads our efforts to prevent and detect modern slavery, participates in cross-functional discussions on a routine basis. In 2019, we established our Ethics and Compliance Committee, comprised of representatives from different functions who are charged with providing oversight and consultation to help Global Ethics and Compliance focus on the right areas. The director of Global Ethics and Compliance meets with the Committee quarterly to provide updates on initiatives and receive feedback and input. The Global Ethics and Compliance team also participates in monthly calls with group-level functions to discuss existing initiatives and how they impact governance and risk.

Sims Limited engaged expert consultants while drafting our Human Rights Remediation Process Policy to validate the effectiveness and completeness of the approach.

Sims Limited's employees participate in local, national, and international trade associations, which provide insight into such issues as gender equality, and environmental and sustainability topics, all of which impact modern slavery risks.

We sought to learn from our shareholders about their concerns and expectations regarding corporate responsibility on Sims Limited's part, including activities designed to prevent Sims Limited from contributing to the system of modern slavery.

Externally, Sims Limited explored feedback from the Australian Council of Superannuation Investors (ACSI) and Monash University around our FY20 Modern Slavery Statement. Our statement was well-received, and we have focused on the areas for improvement they identified to refine our approach.

Sims Limited routinely consults guidance from non-governmental organisations focused on human rights, such as Walk Free by the Minderoo Foundation, Antislavery International, Liberty Shared, Human Rights Watch, and United Nations Global Compact Australia. Sims Limited's Director of Global Ethics and Compliance participates in networking groups of compliance officers.

Recognition and Resolve

At Sims Limited, we know that in pursuit of our purpose, create a world without waste to preserve our planet, we can directly, and indirectly impact people's human rights. We believe that all human beings are born free and equal, and should be treated with dignity and respect. While society has made progress to protect underrepresented populations, there is still much work to be done, and, as an organisation, we have a role to play. By working with our employees, shareholders, supply chain, and other stakeholders globally, we can drive further accountability to protect vulnerable people from harm.

This statement was approved by the Sims Limited Board of Directors on 8 November 2022.

Signed by:

A handwritten signature in black ink, appearing to read 'Geoff Brunsdon'.

Geoff Brunsdon,
Chairman of the Board
Sims Limited

A handwritten signature in black ink, appearing to read 'Alistair Field'.

Alistair Field,
Managing Director and CEO
Sims Limited

Compliance Mapping

Australian Modern Slavery Act Reporting Criterion	UK Modern Slavery Act Reporting Criterion	Reference in this Statement
Identify the reporting entity. Describe the reporting entity's structure, operations, and supply chains.	Organisation's structure, its business, and its supply chain.	<ul style="list-style-type: none"> • Our Company • Our Supply Chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	<ul style="list-style-type: none"> • Areas of Risk
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff.	<ul style="list-style-type: none"> • Our Actions
Describe how the reporting entity assesses the effectiveness of such actions.	Organisation's effectiveness in ensuring that slavery is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	<ul style="list-style-type: none"> • Assessing Effectiveness
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	n/a	<ul style="list-style-type: none"> • Other Relevant Information
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	n/a	<ul style="list-style-type: none"> • Consultation

APPENDIX

Sims Limited Active Entities:

- CIM Trucking, Inc. (United States)
- Global Sustainability Insurance Corporation (United States)
- Kaystan Holdings Limited (United Kingdom)
- Metal Management Indiana, Inc. (United States)
- Metal Management Midwest, Inc. (United States)
- Metal Management Northeast, Inc. (United States)
- Metal Management Ohio, Inc. (United States)
- Metal Management, Inc. (United States)
- PNG Recycling Limited (Papua New Guinea)
- Sims Aluminum Pty Limited (Australia)
- Sims Aluminum, Inc. (United States)
- Sims ARG, Inc. (United States)
- Sims E-Recycling Pty Limited (Australia)
- Sims Foundry Limited (United Kingdom)
- Sims Global Commodities Pte Ltd. (Singapore)
- Sims Group Australia Holdings Limited (Australia)
- Sims Group Canada Holdings Limited (Canada)
- Sims Group German Holdings GmbH (Germany)
- Sims Group Global Trade Corporation (United States)
- Sims Group Holdings 1 Pty Ltd. (Australia)
- Sims Group Holdings 2 Pty Ltd. (Australia)
- Sims Group Holdings 3 Pty Limited (Australia)
- Sims Group Recycling Solutions Canada Ltd (Canada)
- Sims Group UK Holdings Limited (United Kingdom)
- Sims Group UK Intermediate Holdings Limited (United Kingdom)
- Sims Group UK Limited (United Kingdom)
- Sims Group UK Pension Trustees Limited (United Kingdom)
- Sims Group USA Corporation (United States)
- Sims Group USA Holdings Corporation (United States)
- Sims Industrial Pty Limited (Australia)
- Sims Lifecycle Services AB (Sweden)
- Sims Lifecycle Services BV (Netherlands)
- Sims Lifecycle Services Global Holdings BV (Netherlands)
- Sims Lifecycle Services GmbH (Germany)
- Sims Lifecycle Services, S.A. de C.V. (Mexico)
- Sims Lifecycle Serviços Ltda (Brazil)
- Sims Metal Management Finance Limited (United Kingdom)
- Sims Metal Management USA GP (United States)

- Sims Pacific Metals Limited (New Zealand)
- Sims Recycling Solutions Holdings, Inc. (United States)
- Sims Recycling Solutions, Inc. (United States)
- Sims Recycling Solutions India Private Limited (India)
- Sims Recycling Solutions Ireland Limited (Ireland)
- Sims Recycling Solutions Pte. Ltd. (Singapore)
- Sims Recycling Solutions SP z.o.o. (Poland)
- Sims Renewable Energy Limited (United Kingdom)
- Sims Resource Renewal Pty Limited (Australia)
- Sims Southwest Corporate (United States)
- Simsmetal East LLC (United States)
- Simsmet Holdings Pty Limited (Australia)
- Simsmetal Industries Limited (New Zealand)
- Simsmetal Properties NSW Pty Limited (Australia)
- Simsmetal Properties QLD Pty Limited (Australia)
- Simsmetal Services Pty Limited (Australia)
- Simsmetal West LLC (United States)
- SMM New England Corporation (United States)
- SMM Southeast LLC (United States)
- Trishyiraya Recycling India Private Limited (India)

The following entities are associated with a joint venture controlled by Sims Limited.

- Export Enterprises, LLC
- Key Export, LLC
- Richmond Steel Recycling Limited (Canada)
- Rondout Iron & Metal Company, LLC (United States)
- Sims E-Recycling (NZ) Limited (New Zealand)

The following entities are associated with a joint venture controlled by Sims Limited's partner. Because Sims Limited does not control operations, this statement does not cover the activities of these entities, and they are not assessed as part of our operations or supply chain.

- Joule Energy Pty Ltd. (Australia)
- LMS Energy Pty Ltd. (Australia)
- LMS Swanbank Pty Ltd (Australia)
- Navitus Pty Ltd (Australia)
- SA Recycling Inc.
- Sims Energy Pty Ltd (Australia)
- Sims Energy USA Holdings Corp (United States)
- Sims Energy USA LLC (United States)
- Sims Municipal Recycling of New York LLC (United States)



SIMS
LIMITED