



**SIMS
LIMITED**



Modern Slavery Statement 2021

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Our Commitment

We believe 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 Organisation Core Conventions on Labour Standards. Our approach to realising those rights is guided by the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and 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, CEO & Managing Director

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 (“Sims”)* to address modern slavery risks in our business and supply chain for the financial year ending 30 June 2021 (“FY21”).

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

In accordance with the UK Modern Slavery Act 2015, the following Sims UK entities are included in this statement:

- Sims Global Commodities Pte Ltd.
- Sims Group Global Trade Corporation
- Sims Group Holdings 1 Pty Ltd.
- Sims Group Holdings 2 Pty Ltd.
- Sims Group UK Holdings Limited
- Sims Group UK Intermediate Holdings Limited
- Sims Group UK Limited
- Sims Group USA Holdings Corporation
- Sims Lifecycle Services BV
- Sims Lifecycle Services, S.A. de C.V.
- Sims Limited
- Sims Metal Management Finance Limited
- Sims Metal Management USA GP
- Sims Recycling Solutions Holdings, Inc.
- Sims Recycling Solutions, Inc.
- Sims Recycling Solutions Ireland Limited
- Sims Recycling Solutions SP z.o.o.

Reporting entity:

Sims Limited
Level 9
189 O'Riordan Street
Mascot, NSW 2020
Australia

Our Company

Founded in 1917, Sims Limited is a global leader in metal and electronics recycling and an emerging leader in the municipal recycling and renewable energy industries. 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 business divisions include Sims Metal (metal recycling), Sims Lifecycle Services (electronic reuse and recycling), Sims Municipal Recycling (curbside recycling), Sims Energy (harnessing methane from landfills to produce renewable electricity) and our newest venture, Sims Resource Renewal (transforming material left over from metal recycling into useful products).

Sims is an Australian company headquartered in Sydney, New South Wales, and, as of 30 June 2021, has operations in 15 countries located across Asia Pacific, Europe, the UK and North America. Our global workforce consists of 3,881 employees across 144 managed sites. Our personnel are primarily employees, but we also utilise temporary/short-term workers, as well as contractors. We have 22 agents in Asia Pacific, Europe, South America and the Caribbean.

Sims holds a 50 percent interest in four active entities. Sims manages two of these entities, Richmond Steel Recycling (Canada) and Rondout Iron and Metal Co. (United States). The other two, SA Recycling LLC (United States) and LMS Energy Pty. Ltd. (Australia), are not managed by Sims. These joint ventures have 124 sites located in Canada, the United States and Australia as of 30 June 2021.

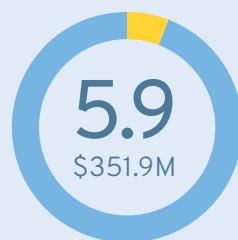


50
FACILITIES
NORTH AMERICA
METAL

Sales to External Customers (%)



AUSTRALIA



BANGLADESH



CHINA

124

JOINT VENTURE FACILITIES
NORTH AMERICA &
AUSTRALIA

28
FACILITIES
UK METAL

18 FACILITIES
SIMS LIFECYCLE
SERVICES

48
FACILITIES
AUSTRALIA &
NEW ZEALAND
METAL

16.5
\$976.1M

TURKEY

20.8
\$1,227.7M

UNITED STATES

42.1
\$2,492.7M

OTHER

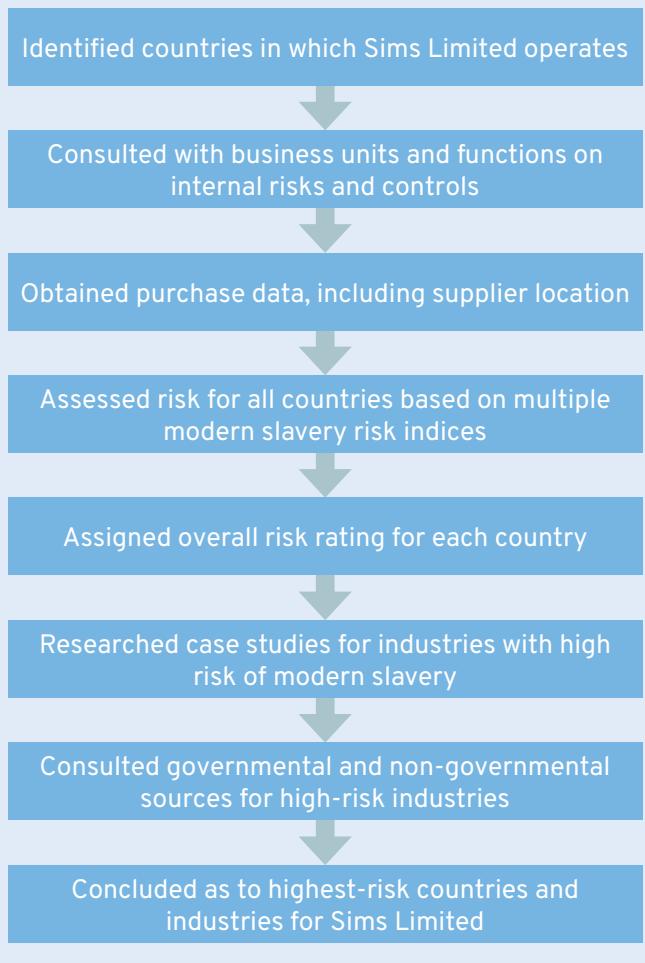
Our Supply Chain

Our trade supply chain is flat, and it solely consists of metal and electronics recycling suppliers and subcontractors.

The suppliers for our Metal division generally fall into three categories. The first is casual suppliers, who recover scrap materials from discarded goods. These are usually sole proprietors or family businesses. The second is scrap dealers, such as auto wreckers, which purchase scrap material and resell it with minimal processing. The third is industrial suppliers, such as tool and die machine shops, which sell us the waste of their operations.

Materials for our electronics recycling division are supplied primarily by multinational corporations and original equipment manufacturers. Sims Lifecycle Solutions engages subcontractors to help process some of the material.

Modern Slavery Risk Assessment



Sims Municipal Recycling's suppliers are limited to collection service providers in the municipalities in which we operate. For our operations producing renewable energy through methane capture, the trade suppliers are the owners of the landfills.

We also utilise the services of agents around the globe to facilitate the sale of our materials.

Our non-trade supply chain consists of equipment providers, transportation and shipping providers, uniform and personal protective equipment suppliers, maintenance and construction providers, and general administrative support providers, including landlords, temporary employment placement firms, security services, cleaning services and recruiters, etc.

The bulk of our trade and non-trade suppliers continue to be in North America, followed by APAC then EMEA. Our high-risk vendors by location are in APAC and represent 0.1% of our total purchases.

Areas of Risk

High-Risk Factors

We conduct business with suppliers and customers in various industries and locations and understand that the risk of modern slavery can vary across geographies and operations. We endeavour to avoid being complicit in or encouraging activities that may cause or contribute to human rights abuses. In FY21, we utilised the same world indices as in FY20 to perform the risk assessment of our global operations and supply chain. We consulted rankings from the Global Slavery Index, the International Labour Organization Composite Score, and the Global Rights Index. In FY21, we refined our analysis by expanding beyond those countries in which we had existing operations to include all available country data in order to be able to identify if new suppliers and operations were located in high-risk locations prior to conducting business with them.

Based on our analysis, ninety-nine percent of our suppliers are still located in 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
- Turkey

Our research into high-risk supplier types based on guidance from NGOs, governments and the media identified the following high-risk supplier types in our operations that are often associated with modern slavery risks of deceptive recruiting, debt bondage and forced labour:

- Recruitment/placement agencies
- Contractors
- Cleaning services
- Personal protective equipment/uniform providers
- Construction
- Shipping vessels

Operations Risk

Our operations are largely the same as they were last year, as are the associated risks.

We continue to supplement our workforce by hiring temporary workers and contractors. We recognize that there is an increased risk for poor labour practices to exist if we do not manage our relationships with third-party labour-hire agencies and contractors well.

In FY21, we continued to have operations in Papua New Guinea, which we have identified as a high-risk country. We have been working on expanding our understanding of modern slavery and mitigating risks there.

Supplier Risk

Our supply chain and associated risks also remain largely the same as last year.

Trade

Modern slavery risks could manifest in our supply chain in many ways. A casual supplier may control the rights of an individual they have “helping” them. Dealers and industrial customers could be paying less than a fair wage, or using forced or child labour in their facilities. The same is true for our subcontractors and service providers. The original equipment manufacturers and multinational corporations that supply the majority of the materials for our e-recycling business are subject to a high level of scrutiny due to their global profiles but may still harbour human rights issues in their supply chains.

SALES IN HIGHER RISK COUNTRIES:

APAC Region

PAPUA NEW GUINEA –

<0.1% of Total Sales

CHINA/HONG KONG –

6.7% of Total Sales

EMEA Region

EGYPT –

3.4% of Total Sales

PAKISTAN – 0.8% of

Total Sales

TURKEY – 16.5% of

Total Sales

Non-Trade

Non-trade suppliers are a source of risks on two fronts. In addition to the location-based risks, the nature of their work can create its own opportunities for abuse. Modern slavery flourishes when the workers are unskilled, unseen and unable to communicate well. Our temporary labour providers, cleaning services, those who furnish 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 of these traits (e.g., those not highly skilled, migrants, and those of low socioeconomic, culturally and linguistically diverse backgrounds).

Agent

Sims utilizes agents to help identify sales into countries in which we do not operate. Overall, Sims has 22 agents providing this service. These agents are sometimes located in or identifying sales in high-risk countries.

In FY21, we had suppliers or agents operating in the following high-risk countries:

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

Customer Risk

Our customers consist of steel mills, smelters, multinational corporations, municipalities and industrial manufacturers. As with our trade supply chain, we perceive the more significant risk of modern slavery to derive from their location.

In FY21, our sales to customers in the following high-risk countries totaled 27% of our total sales:

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



Our Actions

Governance

We work hard to stay abreast of developments in the area of human rights, such as safety in the workplace, fair wages and equal treatment. At a minimum, we comply with all applicable local laws, regulations and standards of the countries in which we operate, and we strive to exceed basic compliance.

Sims' global governance of human rights is overseen by its Board of Directors. The Group Chief Human Resources Officer is responsible for designing and implementing policies and procedures that protect human rights in our workforce, including temporary labour. The Group Chief Risk and Compliance Officer's group provides centralised leadership and guidance around safety, health, environment, sustainability, and ethics and compliance across all of Sims. It is

CASE STUDY

In consultation with operational leadership in Papua New Guinea and local human resources personnel, we determined that the first step we would take to address the higher risk posed by operations in this country would be to improve access to our anonymous grievance system. While our personnel all speak English, visitors to our sites may not. Being able to report in their native tongue, Tok Pisin, was key to making our grievance process accessible to everyone in Papua New Guinea.

Our global hotline could not provide operators that were fluent in this language, so we worked with a local provider to create a new, supplemental hotline that met three key requirements: independence from Sims, anonymous reporting, and operators fluent in Tok Pisin.

We supported the launch of the local hotline by providing training in Tok Pisin by local leadership. The training covered the kinds of things that should be reported, and how to report them. The training was reinforced with posters in Tok Pisin on filing grievances. These were posted in highly trafficked areas of the site, including places that would be visible to visitors and other third-parties.

We rounded out the implementation of the Papua New Guinea hotline by establishing a process for capturing the reports in our centralized report database, which is hosted by our global hotline provider.



this Risk and Compliance group that spearheads our modern slavery response and drives future improvements to and training on policies and procedures.

Our Code of Conduct details our commitment to human rights. This includes specific policies for 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 each and every employee, regardless of status;
- the right to competitive remuneration, supporting the concept of competitive pay for work performed; 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. The annual training includes a link to the Code of Conduct, and we strive to keep employees engaged by highlighting key topics on a rotational basis each year while always reinforcing how to report issues, including both the hotline and open-door reporting options, as well as emphasizing Sims' protection from retaliation for Whistleblowers.

2021 Progress



Issued revised Human Rights Governance Policy to reflect our focus on human rights.



Performed additional due diligence on existing high-risk suppliers with no adverse outcomes.



Embedded Supplier Code of Conduct in our standard terms and conditions and existing high-risk supplier agreements.



Piloted additional due diligence procedures for new high-risk suppliers.



Increased awareness of human slavery risks through employee training and communications.

FY21 Improvements

Sims Board of Directors approved our updated human rights policy effective December 2020. This policy conveys Sims' commitment to respecting, promoting and upholding fundamental human rights and emphasizes the responsibility of senior executives to embed these concepts and processes in our business. Our Human Rights Governance policy can be found on the Governance page of our website at: <https://www.simsltd.com/governance/>

Leveraging the implementation of its new human capital management (HCM) system, Sims was able to

include capturing conflicts of interest and administering and tracking modern slavery training and code of conduct training into its global onboarding process.

Our Supplier Code of Conduct notes that Sims expects its suppliers and business partners to respect human and civil rights by not participating in child labour, inhumane treatment of employees, forced or compulsory labour, or discrimination.

Addressing Operational Risks

Grievance Mechanisms

Sims provides multiple channels of reporting so employees may use the one with which they are most comfortable. They may report locally to their line manager, human resources, or other members of management. They may report to resources at the Group level, including Global Ethics & Compliance, Legal, Human Resources and the Chief Executive Officer. They can make their report in person or via post, email, telephone or our independent hotline. The independent hotline is available to Sims' employees, agents, contractors, consultants, partners, customers, suppliers, visitors, shareholders and other affected persons.

Our goal is to make our hotline as accessible as possible for those who wish to use it. It is available in all jurisdictions in which we operate and has operators representing a majority of languages spoken at our sites. Reports may be made anonymously. We promote our hotline at our sites and offices by making sure the contact information is posted in areas frequented by employees and in areas seen by visitors and service providers. We also include our hotline information in our Supplier Code of Conduct.

Sims' Global Ethics & 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. All reports are investigated, and the identity of the reporter is treated confidentially.

Investigators who address grievances associated with vendors or treatment of employees, temporary workers

and visitors completed the expanded modern slavery training, which included guidance on how to identify and respond to human rights and modern slavery concerns.

Freedom of Association & Right to Collectively Bargain

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

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

In Australia & New Zealand Metal and North America Metal, 41 percent and 32 percent of employees are under collective bargaining agreements, respectively.

All these percentages provide us with a rough estimate that approximately 27 percent of our global workforce is represented by these labour agreements.

COLLECTIVE BARGAINING AGREEMENTS – FY21	
Region	% of employee population
North America	32
Australia, New Zealand	41
UK	~5
Europe/ROW	<5

CASE STUDY



The screenshot shows a news article with the title "Do You Think Slavery is History?". Below the title is a small image of a hand bound in ropes. The article discusses modern slavery, stating that it is estimated there are over 40 million people enslaved around the world. The page includes standard news navigation links like Print, Edit, and Share, along with a "Page Analytics" section.

We reinforced the messages from our training on our Ethics & Compliance global intranet page, devoting an entire page to modern slavery. It was also referenced during our inaugural Ethics & Compliance Month. This new campaign focused on launching new content on the first four Mondays in November 2020, highlighting multiple ethical and human rights topics. In addition to modern slavery, we addressed diversity and inclusion, bribery, bias and acting ethically using videos, stories, comics, quotes, polls, puzzles and other microcontent. Our content was very well-received by the employees and the Ethics & Compliance Month campaign recorded the most hits of any in the history of our intranet. Due to its popularity, it has been approved as an annual event to be held every November.

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. They are required to complete a due diligence questionnaire and sign off on our Code of Conduct.

FY21 Improvements

Realising that effective prevention and detection first requires understanding, we focused on educating our personnel about the realities of modern slavery. We rolled out training that included general awareness of modern slavery and the forms it can take. We included case studies based on real world examples to humanize situations that can seem unreal to those not affected. We also described what slavery might look like at Sims and in our supply chain.

The training included expanded content for personnel in roles that are more likely to impact Sims' detection and prevention of human rights abuses. This included detailed information about specific risks and red flags, as well as how to respond if suspected abuses were occurring. The targeted roles included purchasing, human resources, sales, site management and security.

Sims shifted from a regional to functional alignment for support functions across the company in FY21. This increased the independence of the functions at the local level as they now report to their functional lead instead of local management. This also reduced the impact of local variations and styles on global processes, increasing consistency of experience and access for our personnel.

You can find more information about Sims' initiatives in our [FY21 Sustainability Report](#).

Our core values underpin everything we do – how we act and behave.

SAFETY



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

TRANSPARENCY



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

INTEGRITY



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

EXCELLENCE



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

RESPECT



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

SOCIAL RESPONSIBILITY



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

Addressing Supply Chain Risks

Sims' activities for detecting and preventing modern slavery in our supply chain focuses primarily on due diligence. Sims Lifecycle Services, for example, performs downstream vendor audits annually through a combination of desktop and on-site audits. These audits cover subcontractors, logistics providers and downstream service providers, many of which involve the same high-risk supplier industries and geographies facing Sims. In FY21, 192 vendors were audited remotely and 26 via site visits across the globe, providing 68% percent coverage. On-site audits are usually conducted every three years for essential vendors, with desktop audits conducted when on-site audits are not scheduled. Audit activity was limited by travel and other restrictions due to the COVID-19 pandemic, so we shifted our focus to desktop reviews.

When chartering vessels, our due diligence focuses on ethics and compliance red flags, including 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 to validate the vessel meets our standards for quality and is operated in a manner that respects human rights. We include our customers in this selection process so they may check the vessel meets their standards as well.

New suppliers are subject to due diligence, which varies across the business. We always validate their existence and legal compliance. Additional due diligence steps are tailored to the needs of the business and may include site visits, and website and location validation as well as critical questions concerning labour practices.

We continuously look to improve our processes to identify, address and prevent human rights violations, including modern slavery risks in our operations and our supply chain. Our Supplier Code of Conduct codifies our expectations for the business conduct of our suppliers and partners and can be found at www.simsLtd.com/governance/.

FY21 Improvements

Our Supplier Code of Conduct communicates our expectation that our suppliers share our respect for human rights and take measures to protect them to at least the extent required by law, and hopefully more.

In FY21, we incorporated our Supplier Code of Conduct into our standard terms and conditions, as well as existing supplier contracts in high-risk regions.

We also screened our existing high-risk suppliers through a global intelligence database to ascertain if there was any negative information not previously identified that might prevent us from continuing to do business with them. The database provides extensive data coverage on global persons and entities, including global sanctions lists, narrative sanctions, global regulatory and law enforcement lists, adverse media, and vessel information. We were pleased to find that our screenings found no adverse results for our existing high-risk suppliers.

Additionally, we expanded the content of the downstream vendor audits conducted by Sims Lifecycle Services to explicitly include other modern slavery risks such as sourcing of employees and conditions of employment. For those audits conducted on-site, we incorporated visual red flags, which included sleeping quarters, unnecessary restrictions on freedom of movement such as locked emergency exits, signs of abuse and inability to make eye contact or speak freely. The expanded audit checklist was put into practice toward the end of FY21.

We also crafted additional due diligence procedures for new high-risk suppliers and launched them in a pilot program through one of our export offices. Recognizing that we are responsible for who uses our materials, as well as who supplied them, the export office was selected because it provided an excellent opportunity to test the new procedures on the full value chain. The pilot procedures included a human rights questionnaire, validation of the legitimacy of the customer in terms of legal registration, taxation, and the accuracy of their representations in light of their website and locations, and if there are any sanctions or fines of concern associated with the entity or its owners. It also included a formal assessment and rating system to produce consistent results and objectivity.

Those participating in the pilot program have already begun providing feedback which will be used to refine the due diligence steps before they are rolled out to the rest of the business. We will report on the effectiveness of this pilot program in our next modern slavery statement.

Assessing Effectiveness

A review of the outcomes from Sims' due diligence and monitoring programs – including hotline reporting, site visits and performance reviews for FY21 – did not identify any specific instances of modern slavery harm.

Training is critical to understanding and managing modern slavery risk. More than 99% of our active employees completed both our modern slavery awareness training and our FY21 Code of Conduct training, both of which required a passing grade of at least 80% on the comprehension quiz before employees could exit the program.

We are designing elements to assess the effectiveness of these trainings and will report on these results in our next modern slavery statement.

Another key element of our management approach to modern slavery is our grievance mechanism, especially our independent hotline due to its availability to visitors, vendors and other third-parties as well as our employees. We routinely communicate to our employees during training the various mechanisms available, especially the ability to report anonymously through our hotline.

In order to assess the effectiveness of these communications, we included three questions in the global employee engagement survey administered by Human Resources in the second half of FY21. The questions asked employees to rate their comfort with knowing how to file a report, their level of trust that they can file anonymously, and their trust that Sims will prevent retaliation.

We were pleased to see that the weighted average across the three questions was 3.75 on a 5.00-point scale, with 5 being the best score. This indicates our communications have been effective, and there is a good level of knowledge and trust about our hotline. However, we would like to see improvement. We intend to emphasize these three areas in future communications and training. We will take pulse surveys and include similar questions in the next overall engagement survey (scheduled for FY23) to see the impact these activities have had.

Weighted Scores

3.84

I know how to file a report on Sims Limited's hotline.

3.64

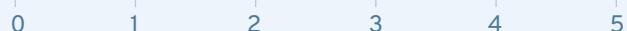
If I file an anonymous report, no one will know it was me.

3.76

If I make a report, I trust that Sims Limited will protect me from retaliation.

3.75

OVERALL



Further Actions

Improving Governance

Should negative impacts be identified in Sims' operations and supply chain, our personnel need to be ready to respond swiftly and effectively. We are committed to developing global guidance on when and how our personnel should respond so people impacted by modern slavery receive fair and just remedies. This will require the development of remediation guidelines and processes, providing the training necessary for our personnel to understand what will be required of them, the resources that are available to them, and the certainty that they are empowered by Sims to take appropriate action. We will begin to progress these actions during the next reporting period.

Addressing Operational Risks

The largest number of people represented by high-risk suppliers is our temporary labour force. Sims utilizes temporary labour to varying degrees across its operations. We need assurance that our partners are providing us with these individuals in a fair and ethical manner. In pursuit of this assurance, during the next reporting period, Sims will begin working with our current and future temporary labour partners across the company to understand how they protect human rights and prevent abuses in their supply chain. This may involve auditing records, updating contracts, providing

training and support, and other steps to validate they have the support they need to be certain their practices are ethical and compliant. This is and should be a detailed process and will likely extend beyond FY22.

Addressing Supply Chain Risks

We will take the lessons learned from our pilot due diligence program for new high-risk suppliers that was launched in FY21 to refine and define our overall approach and embed it across all business units. To support this, we will educate our personnel on the proper performance of the steps and how they contribute to a more fair and equitable world.

Addressing Stakeholder Engagement

The United Nations' Global Compact encourages businesses and organizations across the globe to collaborate and drive a global response to environment, governance, and social issues, giving a human face to a global market. The Global Compact's activities develop operations and strategies that translate the 17 Sustainable Development Goals with the Compact's ten principles into reality, driving peace and security for humanity. Desiring to contribute to this extraordinary and impactful initiative, Sims will become a signatory to the Global Compact in FY22.

2022 PRIORITIES



Becoming signatory to the
UN Global Compact



Focusing on **temporary labour providers**



Developing **remediation guidelines**



Rolling out **additional due diligence procedures** for new high-risk suppliers

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.

Impact of COVID-19

The COVID-19 pandemic continued to present a challenge in FY21. The risk to health and safety, the loss of income, the inability to access education and health care, and the extended social isolation exacted a huge toll across the globe. Lockdowns and travel restrictions confined people to their homes. However, for maritime and other workers, these prevented them from being able to return to their homes and families. We also

witnessed increasing mental health strain from more than a year of restrictions, isolation, uncertainty and fear.

Sims' top priority continued to be to protect our employees' health and safety, both physically and mentally in FY21. Sims was deemed to be an essential business in many parts of the world. Where possible, we facilitated the shift to remote working for our employees. For workers at our operational sites, we deployed strong protocols and controls to protect the health of our employees and prevent the spread of the disease, such as installing partitions, replacing paper copies with digital versions to reduce paper handling (e.g., scale/weighbridge tickets), staggering shift start and end times to allow for physical distancing during shift changes, just to name a few of the precautionary measures implemented.

Once vaccinations became available, Sims worked hard to facilitate access to them for its employees. Globally, we offered paid time off so employees would not forgo vaccination out of fear of losing income. We communicated with our employees at work and at home, educating them and their families on the safety and efficacy of the vaccines.

Sims' COVID-19 Task Force is comprised of cross-regional representatives from Environment, Health & Safety, Human Resources, Risk, and Operations.



The task force provided strong, centralized guidance and support company-wide in the face of constantly changing conditions. The task force refined the safety and operating protocols in our COVID-19 Business Continuity Plan based on guidance from experts at the World Health Organization (WHO) and Centers for Disease Control and Prevention (CDC) and other health authorities across the jurisdictions in which we operate as well as our internal experience and expertise.

Developing a global response alone could have had disastrous results given the fluctuations and uncertainty prevalent in FY21. Vaccination rates varied not just by country but by regions within countries. The resurgence of exposure risks due to the rise of variants and the ongoing tension between tightening and loosening of social distancing restrictions increased the challenges. Sims embedded decision-making at the local level, enabling managers to respond to their local drivers quickly, knowing that Sims would stand behind their actions. By empowering regional and local leaders to pivot based on their specific situations, Sims was able

to quickly respond to the changing conditions region by region, even site by site, to protect our employees.

Sims maintained its employee assistance programs across our operations. These programs provided free benefits via local providers, including mental health counseling, financial guidance, and legal consulting.

We continued to offer work-from-home options where possible, while also establishing procedures supporting the safe return to offices where needed, be it due to business needs, such as physically handling items, or workers who found working-from-home to be a burden.

Our focus on keeping our sites open and maintaining continuity in our commercial arrangements with suppliers served us well in FY21, building a solid foundation for the increased volumes and acquisition of new sites accomplished in FY21. We were able to continue to support work-from-home for a large portion of our workforce, while offering a return to office options for many for whom remote working was less than ideal.

Consultation

Assessing Sims' operations and supply chain for modern slavery risks required a cross-functional dialogue involving the Directors of Global Ethics and Compliance, Corporate Sustainability, and regional Human Resources, as well as Finance and Operational leadership for all our operating entities.

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 CEO 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.

Sims also sought guidance from non-governmental human rights-focused organisations, such as Walk Free by the Minderoo Foundation, Antislavery International, Liberty Shared, Human Rights Watch and the Human Rights Commission of Pakistan.

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

Recognition and Resolve

At Sims, we know that in pursuit of our purpose to 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 9 December 2021.

Signed by:



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

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

Alistair Field

CEO and Managing Director,
Sims Limited

Geoff Brunsdon

Chairman of the Board,
Sims Limited



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