



Human Rights Governance Policy

Version 3.0 — Issued Date: November 2023

Issuer: Global Ethics and Compliance

Approver: Sims Limited Board of Directors

Document Type: Policy

Scope:

Business / Function: Global

Applicable Population: Workforce and Third Parties

Governing Document: N/A

Next Review: November 2024

Our Commitment

At Sims Limited (Sims), our purpose is to create a world without waste to preserve our planet. Sims recognises that in the pursuit of its purpose, its activities can directly and indirectly impact people's human rights.

Sims is committed to respecting, promoting and upholding fundamental human rights in the way the organisation conducts its global business, including those of women, children and indigenous peoples. 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.

This Human Rights Governance Policy provides additional detail supporting our commitment.

Our Policy

On an ongoing basis, Sims assesses human rights-related risks associated with its activities and the effectiveness of its business actions in mitigating them. Some of the measures Sims takes include its health and safety program; diversity, equity and inclusion programs; enforcement of decent labour and working conditions; inclusion of contractual terms and requirements; interactions with indigenous people and communities in Sims' areas of operation; and supply chain due diligence practices.

In addition, Sims engages with internal and external stakeholders to obtain information about potential and actual human rights violations. This includes providing and promoting Sims' hotline for reporting grievances or concerns, as well as training employees to be able to identify, report, and address incidents.

Sims expects those with whom it conducts business to share our respect for human and civil rights by not participating in child labour, inhumane treatment of employees, forced or compulsory labour, or discrimination, as well as by providing equal opportunity, freedom of association, decent and safe working conditions, a living wage and fair terms of employment.

If Sims learns that it may have caused, contributed to or been linked to negative impacts to someone's human rights, we will investigate. If confirmed, Sims will seek to stop the transgression and take corrective measures. This may include changes to policies and procedures, education and training, use of Sims' influence within its supply chain and industry to affect positive changes, and lobbying for improved protections by authorities. The goals of Sims' response will be to work towards stopping the impact, preventing future transgressions, and remediating harm where possible.

Employees and third parties who fail to meet our standards regarding modern slavery and other human rights protections will be held accountable for their action, up to and including termination of their relationship with Sims.

Our Support

As Directors, we support all the above through effective leadership, communication, management systems, training and accountability. Our senior executives make employees and contractors aware of this policy, its impact on them and on the reputation of our business by sharing best practices and lessons learned with all facilities globally. This policy is reviewed regularly in accordance with the Risk Committee of the Sims Limited Board of Directors Charter.

Version History

VERSION	ISSUER	APPROVER	APPROVED DATE
1.0	Safety Health Environment Community + Sustainability	Board SHECS Committee	January 2016
2.0	Global Ethics and Compliance	Board of Directors	December 2020
2.1	Global Ethics and Compliance	N/A	December 2021
2.2	Global Ethics and Compliance	N/A	December 2022
3.0	Global Ethics and Compliance	Board SHECS Committee	November 2023