



SIMS
LIFECYCLE
SERVICES

SimsMMway SHECSQS

Booklet



Safety



Health



Environment



Community



Sustainability



Quality



Security

June 2019

The SimsMMway

The SimsMMway is the philosophy by which all Safety, Health, Environment, Community, Sustainability (SHECS), Quality and Security Leadership and Management is delivered within Sims Lifecycle Services globally. The core of this philosophy is described in this short booklet (The SimsMMway). It contains:

- CEO Commitment Letter
- The Sims Metal Management Core Values
- The SimsMMway Golden Rules
- The SimsMMway Strategic Framework
- Global Sims Lifecycle Services EHS Policy
- Global Sims Lifecycle Services Quality Policy
- Global Sims Lifecycle Services Security Policy

Global Sims Lifecycle Services Security Policy

Our 12 Management Standards that support the SimsMMway are contained in a separate document (The SimsMMway Management Standards).

Both documents are endorsed by the Sims Lifecycle Services Global President. They are compulsory requirements and apply to all legal entities within the Sims Lifecycle Services - Globally.

Safety, Health, Environment, Community & Sustainability: Our Commitment

At Sims Limited, sustainability is at the core of who we are and what we do. We aim to be the world's safest and most responsible recycling company by striving to create a zero harm workplace for our employees, being an exemplary member of the communities in which we operate, and being responsible stewards of the environment. We believe excellence in Safety, Health, Environment, Community and Sustainability (SHECS) practices is vital to the wellbeing of our people and essential to all aspects of our global business. By doing these things well, we will earn the respect and trust of our stakeholders and create sustained growth and profitability in an increasingly resource-constrained world.

Our Principles:

Strive for Zero Injuries and Incidents

Sims Limited believes that all injuries and incidents are preventable. We are committed to a goal of zero injuries. We continuously strive to eliminate injuries and illnesses in the workplace and promote the wellness of our employees, customers, contractors, families and suppliers. We aim to eliminate at-risk behavior through demonstrated leadership and training. In our daily activities, we will embrace "think safe; work safe; home safe."

Demonstrate Environmental Stewardship

Our core business of recycling expresses our inherent commitment to the environment. We are committed to conducting our business in a manner that continually reduces the impact of our operations, protects the environment, and supports the ecologically sound and sustainable use of resources. We will strive to minimize our carbon emissions through the efficient use of energy, the use of renewable and cleaner forms of energy, where practicable and economically viable. We strive to minimize our waste generation at the source and apply waste minimization strategies to eliminate, reuse and recycle our wastes whenever possible.

Partner with Communities and Stakeholders

We are committed to being a respected, responsible corporate citizen, working constructively with our communities and other stakeholders and engaging in the honest and ethical conduct of our business. We support volunteerism and provide opportunities for employee involvement both at work and in the community. We openly communicate our stewardship performance, and we encourage partnerships with local organizations, academia, government and other interested stakeholders.

Integrate into our Business Systems

We aim to fully integrate our sustainability principles into our core business systems. We operate our facilities and engineer our processes, products and services to maximize efficiency and reduce safety and environmental risks. Key foundations include a robust, risk-based management system; management of change; and continual learning. We strive to work with our contractors and suppliers to enhance their environmental and safety performance. We will be prepared for and maintain the capability of responding to emergencies.

Demonstrate Leadership and Accountability

Our leaders share ownership of, and accountability for, our safety, health, environmental and community programs. We will drive continuous improvement daily in pursuit of these goals and commitments. We will report pertinent safety, health, environmental and community issues to our Board of Directors, and will ensure that action plans are in place to achieve this commitment. We will measure and regularly report to the public our global progress in meeting the objectives of this policy. Conforming to this policy is the responsibility of every employee and contractor acting on our behalf.

We embrace this policy because it is the right thing to do, it makes Sims Limited a company in which shareholders can be proud to invest, it allows us to meet our customers' needs and expectations, and it helps drive our competitiveness. This policy is what we stand for at Sims Limited



Alistair Field
Group Chief Executive Officer
Sims Limited



Ingrid Sinclair
Global President
Sims Lifecycle Services

Our Core Values



Safety:

We value human life and health above all else and take action accordingly to maintain the safety of our employees, customers and all visitors to our facilities. We are personally accountable for our own safety. In meeting our goals for quality, cost and schedule, we never compromise 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.

Our Commitment

- We are committed to a goal of zero injuries. We will never put financial results or production objectives ahead of our safety commitments.
- We aim to eliminate at-risk behavior through demonstrated leadership and training.
- We will provide an environment where our employees feel empowered to stop any activity if they see an unsafe act or condition.
- We will provide all employees with the relevant training, appropriate working conditions and required personal protective equipment (PPE) to safely perform their work. Attending the training, following the procedures and using the required PPE is a condition of employment.
- We will operate in compliance with our internal Safety, Health, Environment, Community and Sustainability rules and with all applicable laws and regulations.



Integrity:

We firmly believe that adhering to a strong moral code is a key foundation for earning trust in our company, both internally and externally. We conduct all business with integrity and adhere to the highest standard of ethical business conduct. We recognize our personal obligation to comply with the Sims Limited Code of Conduct and to follow all applicable laws, regulations and company policies. We conduct all business with integrity and adhere to the highest standard of ethical business conduct.

Our Commitment

- We will act honestly and ethically.
- We will act in compliance with the Sims Limited Code of Conduct, all applicable laws, regulations and Sims Limited policies.
- We will manage all conflicts of interest with our Sims Limited Code of Conduct and report any potential conflicts immediately.
- We will take responsibility and be accountable for all our words and actions.
- We will honor our commitments.



Respect:

We value a culture of respect, openness and inclusion in which everyone has an opportunity to contribute. We embrace diversity and diverse opinions. We foster teamwork and collaboration and recognize accomplishment. We will treat each other, our customers, visitors and community members with respect and dignity.

Our Commitment

- We will treat each other with respect and in the manner in which we would like to be treated.
- We will be open to, and accepting of, differing cultures, opinions and points of view.
- We will create and maintain an environment where every employee strives to improve his/her own performance, works to make teammates successful, and feels comfortable to raise differing opinions.
- We will be effective listeners.



Transparency:

We display the appropriate level of transparency about how we operate, to earn the trust and confidence of our customers, employees and stakeholders. We conduct ourselves with openness and candor in all aspects of our work, and seek feedback from all directions. We ensure a sense of appropriate transparency in everything we do.

Our Commitment

- We will share relevant information with those impacted on a timely basis.
- We will share best practices openly across the business without regard to credit or ownership.
- We will honor and respect decisions made in a team environment.
- We will communicate openly across the business without hidden agendas.
- We will communicate important developments on a timely basis to prevent the possibility of surprises.



Excellence:

We will never stop raising the bar. We commit to excellence in all that we do through “first-time” quality, continuous improvement and meeting or exceeding our stakeholders’ expectations. We encourage new and innovative ideas with forward thinking. We stress safety, quality, productivity, growth, best practice, and measurement. We commit to excellence in everything we do and champion continuous improvement and sharing of best practices across the company.

Our Commitment

- We will value the discipline of a process-driven approach that results in effective timely action.
- We will aim to maximize returns on the capital entrusted to us by our shareholders.
- We will stimulate innovation and creativity.
- We will openly share best practices across the company.
- We will promote a diverse global workforce.



Social Responsibility:

Sims Limited will aim to be a leader in sustainability. We are committed to the ecologically sound and sustainable use of resources and we will operate in a manner that minimizes waste and protects the environment. We will act to positively contribute to our community and environment with a commitment to all stakeholders who will feel the future impact of the choices we make today. We aim to be the world’s safest and most sustainable recycling company.

Our Commitment

- We will be responsible corporate citizens and environmental stewards in the communities where we work and live.
- We will work closely with our communities and local organizations to ensure that our company is always a responsible citizen.
- We will undertake Sustainability programs designed to ensure that that we mitigate the impact of our work on the environment.
- We will work continuously to reduce the carbon footprint and energy needs across our businesses.
- We will support volunteerism and provide opportunities for employee involvement both at work and in the community.

Our Golden Rules

Our Golden Rules support our Company's core value of safety. The Company is committed to ensuring that you have proper training in these rules but violating a golden rule is a serious offense that will lead to disciplinary action up to and including termination.



Personal Protective Equipment (PPE):

Always ensure you are equipped with all required PPE and it is used correctly.



Lock Out/Tag Out:

Always ensure a Zero Energy State before working on any piece of equipment or machinery. Ensure all energy sources, including stored energy, have been isolated and locked/tagged out.



Fall Prevention:

Always wear and use prescribed fall prevention equipment when working from heights.



Vehicle/Mobile Equipment and Railcar Safety:

Always ensure when operating vehicles/mobile equipment and railcars that you comply with safe loading, unloading, operating and working distance requirements and never operate any vehicle/mobile equipment or operate or couple any railcar without the required training, qualification/certification and supervisor authorization. Never enter a known "Exclusion Zone" or "Controlled Access Area."



Machine Guarding:

Never operate mobile or stationary equipment without all safeguards installed by the manufacturer and required by our SHECS policies/protocols and procedures in place.

**Lifting Operations:**

Never begin any lifting operation either manually or utilizing a crane, hoist or other mechanical lifting device unless the device is certified as safe and unless the employee is properly trained, qualified/certified and authorized by employee's supervisor.

**Modification of Equipment/Safety Systems:**

Never modify safety control equipment or safety systems unless qualified/certified and authorized by employee's supervisor.

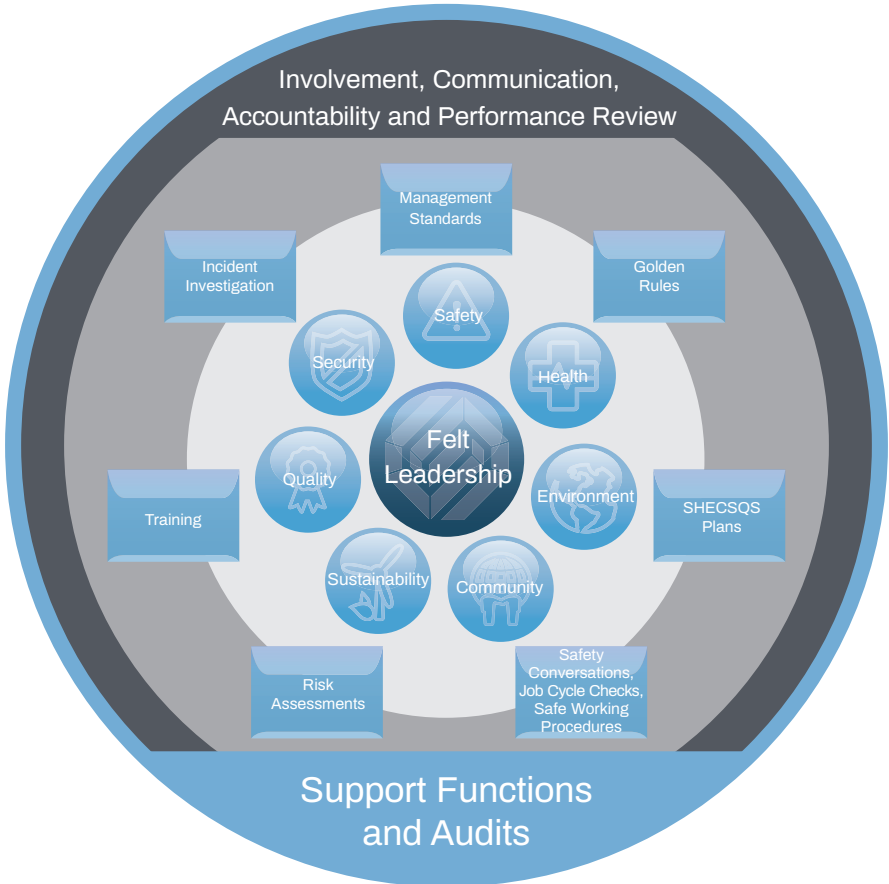
**Permit/Authorization to Work – Confined Spaces and Hot Work:**

Always follow the Permit to Work and Authorization to Work process and procedure. Each employee and contractor must obtain a written permit to work form before conducting hot work confined space entry, work on energy systems or work involving ground disturbance in locations where buried hazards may exist. Non-Routine Operations must be approved by responsible supervision, through the Risk Assessment/Authorization to Work process.

Alistair Field
Group Chief Executive Officer
Sims Limited

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Global President
Sims Lifecycle Services

Our SimsMMway Strategic Framework for Management of SHECSQS



Environment, Health and Safety (EHS) Policy

Sims Lifecycle Services is committed to the goals of sustainable development. We balance social, environmental and economic considerations in how we manage our business. We are committed to the principles of protecting workers' basic human rights, accountability of all materials and by-products to final disposition, prohibition of prison labor use and exports that violate the Basel Convention.

Management has prime responsibility for managing environmental, and health and safety programs. Supervisors are responsible for ensuring a healthy and safe working environment for employees under their direction. All employees are responsible for working safely and in compliance with the law and all Sims Lifecycle Services requirements.

To implement this policy and show its commitments to the protection of the environment, the health and safety of its workers, and its management of end of life electronics according to the reuse, recover, disposal hierarchy, Sims Lifecycle Services will:

STRIVE to be leaders in environment, health and safety management by minimizing our impact on and risks to our employees, the public, our communities, our customers and the natural environment, throughout all stages of our business activities.

MEET or surpass applicable environmental, health, hygiene, safety, emergency preparedness and response legislation, and other requirements to which the company subscribes.

ESTABLISH clear and meaningful objectives and targets for environment, safety and health management activities.

IMPLEMENT management systems to address risks, pollution prevention, environment, health and safety, and energy efficiency and perform regular audits to ensure continuous improvement.

FACILITATE dialogue with external parties in order to anticipate and address relevant issues of sustainability and the protection of basic human rights.

MAINTAIN and promote stewardship, reuse, recycling and waste minimization programs to benefit and protect employees, the public, customers and the environment.

ENSURE that improvements in safety, health, and well-being of all employees will be a major consideration in all workplace designs, equipment purchases, training programs and work procedures.

PROMOTE employee awareness of this policy, and provide the necessary resources for employees to integrate environment, health and safety into their activities.

COMMUNICATE our progress openly and on a timely basis with employees, the public, governments and other communities of interest, and our data security principles with our customers.

PREVENT injuries and ill health to our employees, contractors, and visitors while working to achieve a zero harm workplace.

Quality Policy

Sims Lifecycle Services specializes in the recycling of waste electrical and electronic equipment, IT asset management involving the secure data eradication and the servicing, refurbishment and reuse of electrical and electronic equipment, including those services provided on-site at Client's facilities.

Our Policy

It is the overall goal of Sims Lifecycle Services to better serve our customer by continuously taking action to improve the quality of our processes, products and services and it is our intention to:

- Implement, maintain and improve our Integrated Management System (IMS) and this Quality Policy;
- Use risk based principles to manage the inputs and outputs to our IMS and all of its components;
- Set defined objectives and targets which are measurable;
- Provide adequate resources to support this Policy;
- Communicate this Policy to all Sims Lifecycle Services employees via training and postings throughout our Facilities;
- Assure procedures are in place to verify the accuracy of test methods, testing equipment, and maintaining records of effective testing methods;
- Utilize sound strategy in determining the sales prices of material, components and equipment;
- Work with our entire recycling chain including clients, downstream vendors, suppliers, customers, and contractors to fulfill our quality, security, environmental, health and safety goals;
- Comply with all relevant regulations of the countries importing equipment, components, or materials that have passed through our facility or control.

We recognize that the responsibilities for Quality are shared by our all of our employees and as such all of our employees must strive to meet and when possible to exceed our customer expectations.

Sims Lifecycle Services suppliers and sub-contractors, who perform services on our behalf, are required to be compliant with the ethos of this Policy. All interested parties may have a copy of this Policy, as a statement of intent on the part of Sims Lifecycle Services to meet Client and Customer expectations.

Our Commitment

We are committed to supporting all of the above through effective leadership, procedures, management systems, training and accountability at all levels and making employees and contractors aware of this Policy, its impact on them and on the reputation of our business. Management will demonstrate its commitment through participation in Management Reviews and will be responsible for monitoring and reviewing performance measures.

Security Policy

Sims Lifecycle Services specializes in the recycling of waste electrical and electronic equipment, IT asset management involving the secure data eradication and the servicing, refurbishment and reuse of electrical and electronic equipment, including those services provided on-site at Client's facilities.

Our Policy

Sims Limited has an over-arching Information Security Policy, designed to protect its Information Assets to ensure:

- the confidentiality of Company, Client and Customer Information,
- privacy of personal information (in accordance with law),
- integrity and availability of Information Assets when needed for Company purposes,
- prevention of inappropriate use of or unauthorized access to Facilities/Information Assets,
- compliance with law and contractual obligations,
- the security of all Information Resources,
- appropriate controls based on the input/output of a formal risk assessment process,
- continual review and improvement through a robust governance process, including the setting of objectives, and
- to provide a framework of management and controls to reduce security risks in the organization.

The purpose of the Sims Limited Information Security Policy is to set forth the Company's expectations of its Employees and requirements regarding the protection of its Information Assets and use of the Internet and Email System, and to clarify responsibility for ensuring those expectations and requirements are being met, as well as to clarify that there should be no expectation of privacy with respect to communication by means of Information Resources.

In support of the SMM Information Security Policy, Sims Lifecycle Services has a set of Protocols and supporting Procedures designed to protect its facilities from unauthorized access and its employees and property from damage or harm. These Protocols/Procedures are approved by management and communicated to employees and external parties.

Prior to using a sub-contractor, and in combination with other evaluations, a physical audit will be carried out to determine the risks associated with the sub-contractor and what security controls they must have in place. Sub-contractors, who perform services on our behalf, are required to be compliant with the ethos of this Policy.

Our Commitment

We are committed to supporting all of the above through effective leadership, procedures, management systems, training and accountability at all levels and making employees and contractors aware of this Policy, its impact on them and on the reputation of our business. Management will demonstrate its commitment through participation in Management Reviews and will be responsible for monitoring and reviewing performance measures.



Think Safe. Work Safe. Home Safe.