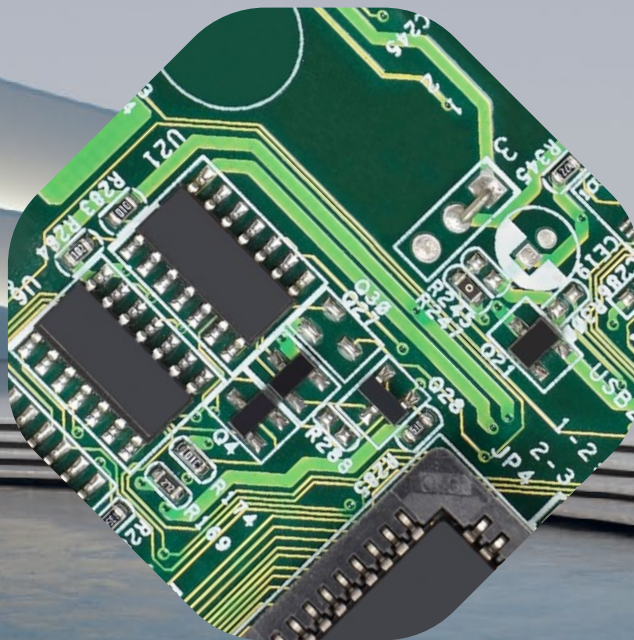


STRENGTH



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Our purpose-led strategy allows us to create value by providing a pathway to decarbonisation and circularity.

Create a world without waste to preserve our planet

We enable the reuse of finite natural resources and foster the decarbonisation of our customers' supply chains, which creates measurable, positive impact for individuals, communities, industries and governments.

Acknowledgement

We acknowledge the Traditional Owners of the land where we operate and work. We recognise their continuing connection to land, waters and culture. We pay our respects to their Elders, past and present.

Forward-looking statements

The material contained in this document is a presentation of information about the Sims Limited business portfolio's current activities at the date of the close of the reporting period, 30 June 2023. It is provided in summary form and does not purport to be complete.

It should be read in conjunction with Sims Limited's periodic reporting and other announcements that have been lodged with the Australian Securities Exchange (ASX). To the extent that this document may contain forward-looking statements, such statements are not guarantees or predictions of future performance and involve known and unknown risks, uncertainties and other factors – many of which are beyond the control of the business portfolio – and may cause actual results to differ materially from those expressed in the statements contained in this release.

This document is not intended to be relied upon as advice to investors or potential investors and does not take into account the investment objectives, financial situations or needs of any particular investor.

Sustainability reporting suite

Sims Limited's sustainability reporting suite, which includes the FY23 Sustainability Report, Climate Report, Sustainability Databook and Modern Slavery Statement, is available at www.simsltd.com/sustainability.

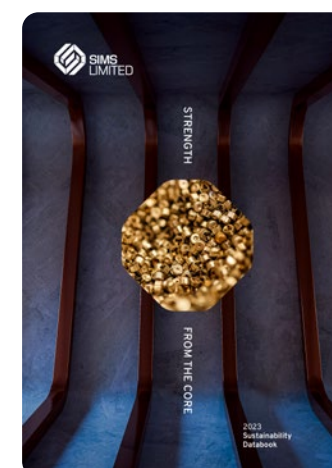
All reporting for the period from 1 July 2022 through 30 June 2023 was done according to the [Global Reporting Initiative \(GRI\) Standards](https://www.gri.org/), and the GRI index is available in the Sustainability Databook. The Annual Report and statement of financial results are available at www.simsltd.com/investors. All currency amounts are in Australian dollars.



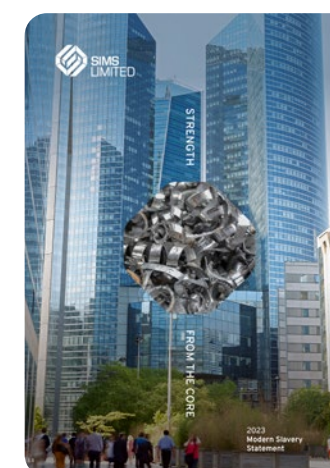
Sustainability Report FY23



Climate Report FY23



**Sustainability Databook
FY23**



**Modern Slavery Statement
FY23
(December 2023)**

CEO and chair statement

This report marks 10 years since our company produced its first sustainability review. Since we published our FY13 Sustainability Overview, the world has evolved, and our company has evolved with it. We are proud of how Sims Limited is innovating sustainable solutions to drive our business growth and working with partners to advance a lower-carbon, circular economy.

We are also proud of what remains the same – our commitment to our core values, to the communities in which we operate, and to transparently reporting our progress. We both agree that it has been a privilege to work together, with the Board, executive leadership team and all employees at Sims Limited, as we advance our purpose-led strategy.

Our purpose, to create a world without waste to preserve our planet, is integrated into our FY25 sustainability strategy and continues to be the lens by which we consider every aspect of our business.

In FY23, we continued to make strong progress against our strategy and the FY25 goals we have set for ourselves. The three pillars of our sustainability strategy – operate responsibly, close the loop and partner for change – continue to guide our efforts.

Operate responsibly

For the third consecutive year, our company experienced the lowest number of critical risk injuries, recordable injuries and lost-time injuries on record, and we were fatality-free for the fourth consecutive year. We also saw strong results this year in our safety culture survey. The survey informs our approach as we begin our “Commit to Care” leadership program, which focuses on creating an environment of trust, learning and psychological safety.

We also used the insights that we gained from employees through our first diversity and inclusion survey to build our strategy and a five-year roadmap. We have made substantial progress on our current goals, which include closing our gender pay equity gap, maintaining our representation of women in senior roles, and in Australia, launching our second Reconciliation Action Plan.

We also continued to advance in our commitment to ethical and transparent operations. We have conducted training on human rights, including

targeted training to improve our ability to respond to and remediate any detected incidents. We have grown our capability by completing the United Nations Global Compact Human Rights Accelerator program and joining the Business Ethics Leadership Alliance. In 2022, we also published our first tax transparency report to help stakeholders better understand our company's tax strategy, governance and compliance with relevant taxation laws.

Close the loop

We have made strong progress against our climate goals, which were strengthened in ambition in FY22. More than 80% of electricity consumed is now matched with renewable sources, and we have exceeded our FY25 target of 23% emissions reduction against our FY20 baseline.¹

Sims Resource Renewal, which aims to close Sims Metal's operating loops, progressed its demonstration plant into the commissioning phase in FY23. Meanwhile, as a key enabler of the circular economy, Sims Limited continues to divert valuable resources from landfill, reduce demand for virgin raw materials and bring benefits to our value chains in a number of ways, including mitigating greenhouse gas emissions. This year, Sims Limited contributed toward 11.6 million tonnes of avoided emissions compared to making the same amount of steel from raw materials, and Sims Lifecycle Services contributed to a further 0.8 million tonnes of avoided emissions.

Partner for change

Achieving our purpose requires genuine partnership with our communities, customers and stakeholders. During the year, we extended our social licence framework to provide resources and support for leaders and their teams to work collaboratively with local stakeholders. We also began deploying our new community impact framework and identified those purpose-aligned areas where we will

concentrate our future efforts. In FY23, Sims Limited supported Türkiye, our second largest export market (18.3% sales to external customers, with a \$200,000 donation to on-the-ground earthquake relief efforts, led by AHBAP and UNICEF.

As in years past, we were recognized by notable organizations and ratings agencies for our sustainability leadership in FY23. We are proud that Sims Limited debuted on the FTSE4Good index, returned to the Dow Jones Sustainability Indices Australia index, and received a leadership score of A- from CDP for our climate disclosure during the reporting year. In addition, Sims Limited ranked 14th on the Corporate Knights 2023 list of the World's Most Sustainable Companies, was included

on the Carbon Clean200 list, was named to the Asia-Pacific Climate Leaders 2023 list by the Financial Times, and was among Newsweek's List of America's Most Responsible Companies.

We are immensely proud to have participated in building upon Sims Limited's heritage of more than 100 years of contributing to the circular economy. We are confident that Sims Limited's industry-leading position and knack for innovation will continue under the leadership of Stephen Mikkelsen, the incoming chief executive officer and managing director. On behalf of the board and the executive leadership team (ELT), we'd like to thank all our employees for their dedication to, and effort in, making Sims Limited a safe, inclusive and sustainable company.



Geoff Brunson,
Chairman

Alistair Field,
Group CEO &
Managing Director

¹ Market-based emissions

Sustainability highlights

Making strong progress toward our goals.



84%

renewable electricity
consumption



BEST-EVER

year in safety performance
on record



26%

of executive and senior
leaders are women,
surpassing our
FY25 goal



Lowered
emissions

32%²



Asia-Pacific
Climate Leader 2023



WE SUPPORT



Became UN Global
Compact signatory

Sims Limited has been
included in the following indices:

Member of

**Dow Jones
Sustainability Indices**

Powered by the S&P Global CSA



FTSE4Good

² Scope 1 and 2 (market-based) emissions. Based on FY20 baseline

How we create value

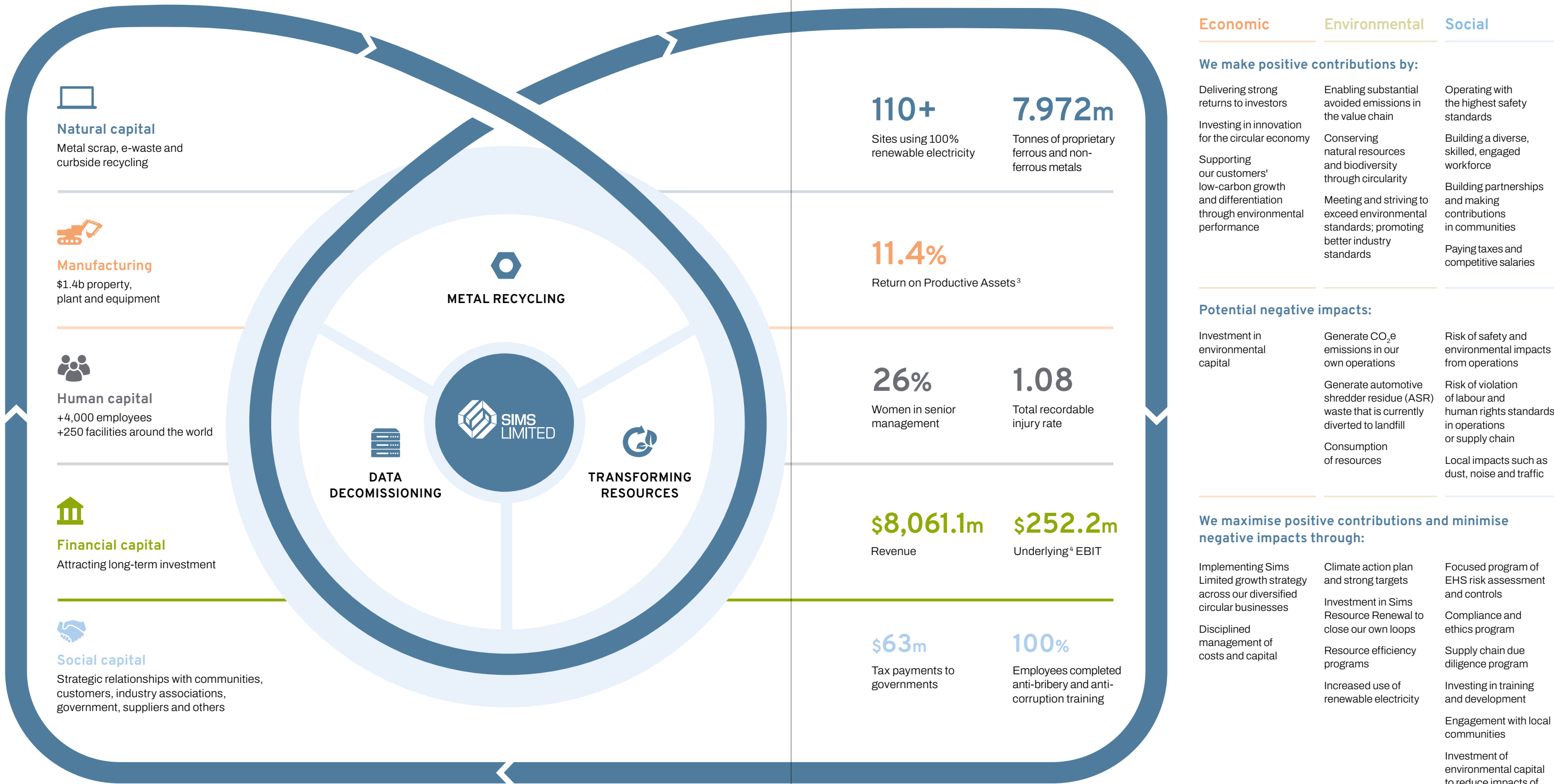
Our purpose, create a world without waste to preserve our planet, is what drives us to constantly innovate and offer new solutions in the circular economy for consumers, businesses, governments and communities around the world.

WHAT WE RELY ON

WHAT WE DO

THE VALUE WE CREATE

IMPACT OF VALUE



³ Underlying EBIT/average of opening non-current assets and ending non-current assets, excluding assets relating to adoption of AASB 16 Leases and deferred tax assets
⁴ Underlying earnings excludes significant non-recurring items, the impact of non-qualifying hedges and internal recharges

Sustainability strategy overview

Our purpose, to create a world without waste to preserve our planet, is foundational to our sustainability strategy and embedded in how we do business.

Our strategy includes ambitious goals to minimise our environmental footprint, enable a circular economy and positively impact the communities in which we operate, while also including targets for growth. Through our focus on responsible growth, we will grow the value we create for all stakeholders as we work toward our measurable and ambitious goals across the three pillars of our strategy.

Sims Limited sustainability strategy

PARTNER FOR CHANGE

CLOSE THE LOOP

OPERATE RESPONSIBLY



- Foster a no-harm work environment
- Close the gender gap
- Develop a skilled and energised workforce
- Ensure transparency on how our business is conducted in an ethical manner



- Become carbon neutral by 2030 and achieve net zero by 2050
- Achieve no waste to landfill
- Close materials loops further by expanding capacity and services



- Build trusted relationships with our communities
- Create new business models that further the circular economy

Create a world without waste to preserve our planet



Sims Metal car at the Port Headland, Western Australia site for the 2023 Outback Car Trek, a fundraiser for the Royal Flying Doctor Service.

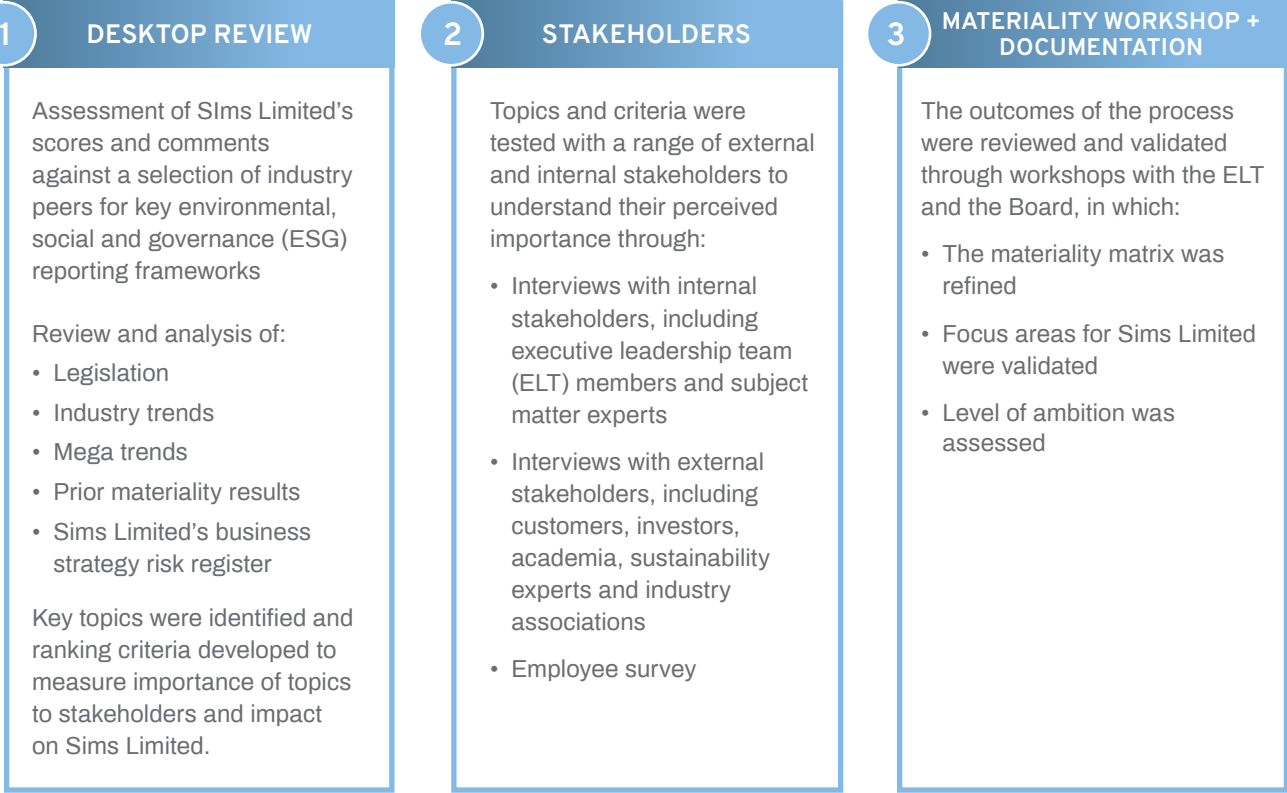
Materiality

Regular materiality assessments are incorporated into a range of processes, including annual sustainability reporting and social licence and risk management reviews, which Sims Limited uses to identify the material topics that should be elevated in our strategy and reporting. These processes help us monitor risks, identify opportunities and connect with stakeholders on topics that matter to them.

During FY22, we conducted a formal materiality process that included research, internal and external stakeholder engagement, and data analysis. The process was carried out by third-party sustainability consultants who engaged with stakeholders. A range of sustainability topics was tested and ranked by the relative importance of each in relation to the impact to Sims Limited and to their organisation. Key internal and external stakeholders

were interviewed, and employees had the opportunity to contribute their views through a survey. Criteria were developed to measure the importance of each topic, including how critical a topic was to the delivery of Sims Limited's strategy and impact on reputation. The importance to relationships with Sims Limited's stakeholder groups also was considered.

The materiality assessment highlighted new and emerging sustainability topics for Sims Limited and our stakeholders. The relevance of most sustainability topics, including health and safety, climate action, environmental stewardship, social licence and innovation in our sustainable businesses, did not vary significantly by either geography or business.

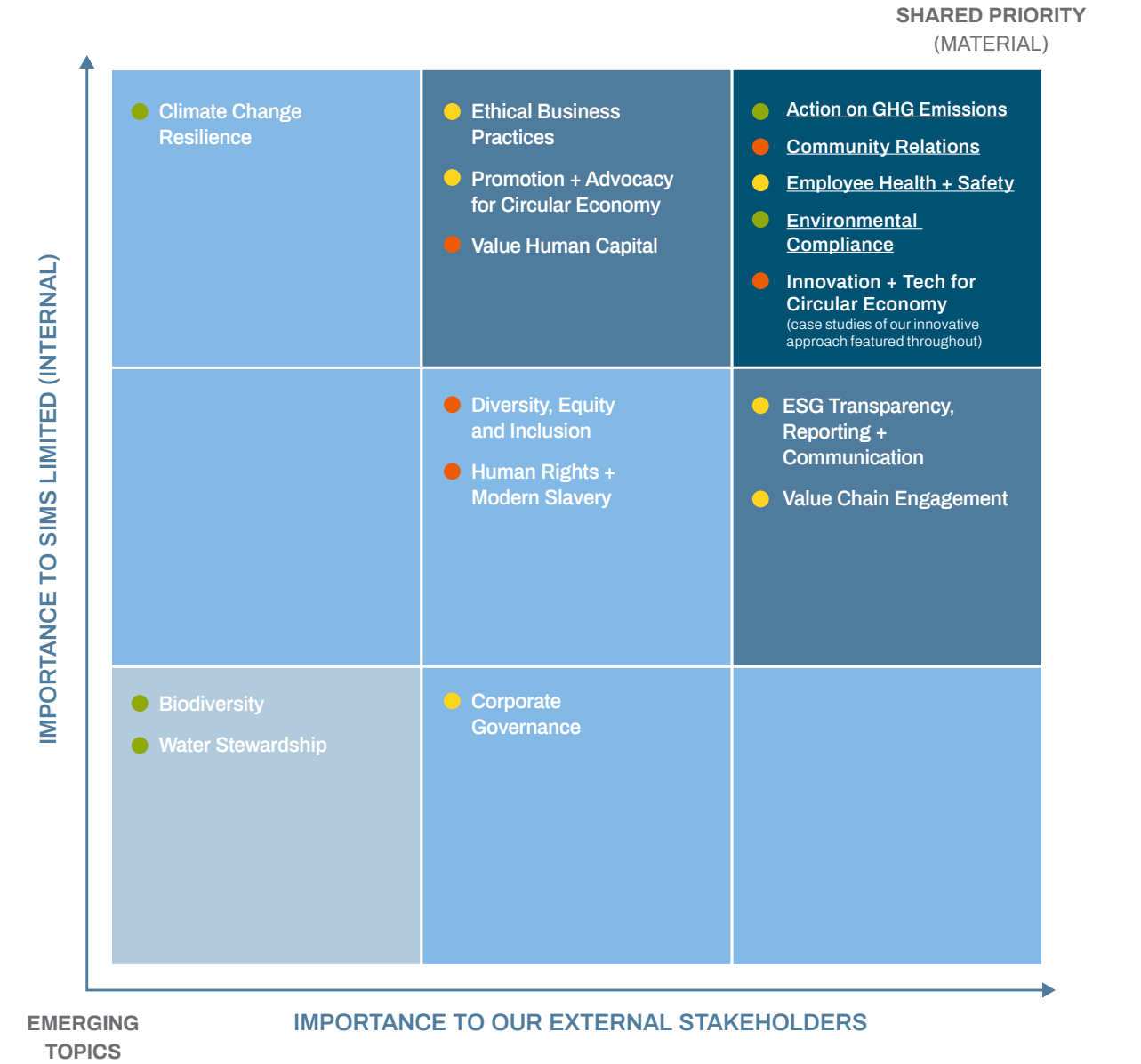


In FY22, we also changed the presentation of the matrix to a grid format and grouped related topics together to help make our matrix easier to interpret. The top-right box shows those topics, presented in alphabetical order, that are the shared priorities of Sims Limited and our stakeholders. Each of the topics has been linked to one of our sustainability strategy pillars: operate responsibly, close the loop and partner for change. Each pillar is aligned to one of three United Nations Sustainable Development

Goals (SDGs). More detail on the materiality process and a definition of each of these topics is available in the Sustainability Databook. The content of this year's report has been aligned to these material topics.

The process followed aligned with the GRI framework and AccountAbility's AA1000 Series of Standards, which are frameworks that demonstrate international best practices for corporate reporting and stakeholder engagement.

MATERIALITY ASSESSMENT



● Environmental

● Social

● Governance

Business Critical

Most Important

Important

Less Important

Stakeholder management

Stakeholder engagement helps create a feedback loop that enhances the way we do business, builds relationships and creates value. We define our stakeholders as those individuals or organisations who most affect or are affected by our company's business. By engaging in meaningful dialogue, we can shape the conversation around sustainability and drive change.

	Employees	Investors and Shareholders	Suppliers	Customers	Communities	Government and Regulators
HOW WE ENGAGE	<ul style="list-style-type: none"> Surveys (DEI, safety culture) Town hall/all-hands meetings (in-person and virtual) and site visits by ELT Internal events (e.g., International Women's Day) Global intranet and app, newsletters, emails, posters, regular team meetings, etc. Annual performance and development review Labour relations dialogues Safety alerts Toolbox talks 	<ul style="list-style-type: none"> Annual General Meeting (AGM) Reporting suite Investor Day Media and website Email, calls, briefings Conferences Responding to ratings indexes and analyst questionnaires (e.g., MSCI, Sustainalytics) 	<ul style="list-style-type: none"> Meetings, emails, calls Supplier Code of Conduct Contracts and purchase conditions 	<ul style="list-style-type: none"> Meetings, emails, calls Site visits and training sessions Media and website Reporting suite Responding to ratings indexes (e.g., CDP) Responding to customer due diligence surveys 	<ul style="list-style-type: none"> Meetings, emails, calls Media and website Local events and sponsorships Community clean-up events Virtual engagement rooms Site visits 	<ul style="list-style-type: none"> Participation in local and global associations (e.g., World Business Council for Sustainable Development) Constructive dialogue with regulators and governments on the circular economy, manufacturing and decarbonisation Permits and development process Meetings, calls, letters
MATERIAL TOPICS	<ul style="list-style-type: none"> Employee health and safety Diversity, equity and inclusion (DEI) Environmental compliance Action on GHG emissions Value human capital 	<ul style="list-style-type: none"> Action on greenhouse gas (GHG) emissions Health and safety Innovation and technology for a circular economy DEI Community relations Environmental compliance Corporate governance ESG reporting, transparency and communication 	<ul style="list-style-type: none"> Value chain engagement Action on GHG emissions Innovation and technology for a circular economy Human rights and modern slavery 	<ul style="list-style-type: none"> Value chain engagement Action on GHG emissions Health and safety Innovation and technology for a circular economy 	<ul style="list-style-type: none"> Community engagement Environmental compliance Value human capital 	<ul style="list-style-type: none"> Environmental compliance Health and safety Action on GHG emissions ESG reporting, transparency and communication Promotion and advocacy for a circular economy Human rights and modern slavery
HOW WE RESPONDED IN FY23	<ul style="list-style-type: none"> Health and safety record performance (p 40) Sims University Learning Center – 89,000 completed trainings in FY23 (p 45) Targeted talent programs (e.g., early career, Women Leading @ Sims – p 38) Employee Experience & Culture Committees (p 44) Employee assistance program for well-being and mental health support 	<ul style="list-style-type: none"> Continued progress against growth strategy (p 16) including acquisition of Northeastern Metal Traders Climate advisory vote at 2022 AGM Increased external assurance over sustainability reports First dedicated ESG briefing in 2022 	<ul style="list-style-type: none"> Global procurement program Training on Code of Conduct and Modern Slavery for agents (p 50) Member of Supply Nation, the leading body for verified Indigenous-owned business in Australia (p 43) 	<ul style="list-style-type: none"> Continued innovation to produce high-quality metal products Avoided emissions calculator for Sims Lifecycle Services (SLS) (p 21) 	<ul style="list-style-type: none"> Community engagement, volunteering and partnerships (p 46) Launched Innovate Reconciliation Action Plan (p 43) Environment, Health & Safety (EHS) program to manage local environmental impacts such as dust and noise (p 24) Hiring and procurement from local communities 	<ul style="list-style-type: none"> Signatory to UN Global Compact Increased external assurance over sustainability reports Industry association review to ensure alignment with our climate policy Shadow carbon price Participant in government and industry dialogues and early engagement with regulators/policy makers
OUR CHALLENGES	<ul style="list-style-type: none"> Engagement on sustainability goals and strategies Increasing percentage of employees who receive a performance appraisal recorded in our human resources system 	<ul style="list-style-type: none"> Continued price volatility and inflationary pressures Cloud material shortage due to ongoing supply chain issues and global economic uncertainties Global uncertainty because of geopolitical risks and macro-economic factors 	<ul style="list-style-type: none"> Effectively measure and manage Scope 3 emissions in the supply chain Manage human rights and sustainability risks through due diligence 	<ul style="list-style-type: none"> Understanding customer pathways to report and reduce emissions from secondary metal making Increase in varying customer due diligence surveys and requests 	<ul style="list-style-type: none"> Measuring and acting on community and stakeholder engagement in line with FY25 target Gentrification of areas surrounding processing sites Acting on biodiversity Water stewardship 	<ul style="list-style-type: none"> Evolving policy and regulatory frameworks (e.g., carbon pricing, secondary materials classifications) Advocacy for the circular economy as essential for decarbonisation Management of environmental claims

FY25 sustainability strategy progress

At Sims Limited, our growth strategy and sustainability strategy are integrated. The growth of our circular businesses is both driven by and delivers sustainable outcomes for society. We are proud of the progress Sims Limited has made and the action we have taken in the third year of our sustainability strategy.

OPERATE RESPONSIBLY								
1	Foster a safe work environment	Target	FY20 Baseline	FY21	FY22	FY23	Progress	Learn more
1.1	Total Recordable Injury Frequency Rate (TRIFR)	≤1	1.29	1.22	1.18	1.08	↗	Pg 30-35
1.2	Lost Time Injury Frequency Rate (LTIFR)	≤0.10	0.29	0.27	0.23	0.19	↗	Pg 30-35
1.3	Achieve and maintain a safety culture index in the survey top quartile	≥80	71	–	–	See pg 73	↗	Pg 30-35
1.4	Eliminate critical safety risks, Critical Risk Incident Frequency Rate (CRIFR)	≤0.50	0.83	0.51	0.35	0.74 ⁵	↗	Pg 30-35
2	Close gender gap							
2.1	Women in manager positions and above	25%	15%	17%	26%	26%	✓	Pg 38
2.2	Close gender pay equity gap	0%	–	9.4%	8.2%	2.9%	↗	Pg 38
2.3	Achieve representation of women on the board	≥40%	37.5%	37.5%	50.0%	37.5% ⁶	↗	Annual report
3	Develop a skilled and engaged workforce							
3.1	Maintain an engaged and satisfied workforce as demonstrated by employee engagement survey results in the top quartile	4/5 (overall engagement)	4/5	4.1/5	–	–	→	Pg 44
3.2	Invest in education by increasing the number of available skill/career development training programs by 50 percent and promoting them	338	225	376	469	819	✓	Pg 45
3.3	Improve annual employee performance review process to align with Sims Limited's purpose; incorporate role competencies and a skills development plan	100%	0	0	0	60%	↗	Pg 44
3.4	Ensure management incentive plan is consistent with sustainability goals	100%	Partial	Partial	Partial	Complete	✓	Annual report
4	Ensure transparency on how our business is conducted in an ethical manner							
4.1	Train all active employees and agents on our Code of Conduct, anti-corruption and anti-bribery policies	100%	0	100%	100%	100%	✓	Pg 50-51
4.2	Provide all active employees with training on human rights, modern slavery and labour rights to raise awareness and help fight human rights violations	100%	0	100%	100%	100%	✓	Pg 50-51
4.3	Develop a supplier Code of Conduct and implement supply chain due diligence to identify and address high risk of human rights violations and unethical practices	100%	0	Supplier Code of Conduct issued	Enhanced due diligence for high-risk suppliers	Enhanced due diligence for high-risk suppliers rollout complete	↗	Pg 50-51

5 Captures not only critical risk incidents but also hazard IDs and near misses. Increase due to improved awareness of risks and better reporting from regions; 49% of reports were from hazard IDs and near misses, not incidents.

6 With appointment of Kathy Hirschfield to the Board (1 September 2023), the percentage is 44%

This year, we celebrate the early achievement of some key goals, including some achieved in FY22 where performance has been maintained. These goals include:

- 32% reduction in Scope 1 and 2 emissions from our FY20 baseline
- 25% of women in manager positions and above
- Number of training courses increased by 50%
- Trained 100% of employees on our Code of Conduct, anti-corruption and anti-bribery policies
- Trained 100% of employees on human rights, modern slavery and labour rights

In FY22, we set additional climate targets to help accelerate our decarbonisation performance and reflect changing stakeholder expectations. In FY23, we continue to evolve how we measure progress against our targets, such as introducing capability to collect offline training completions and reflect them in our online learning platform. Sims Limited also announced an intention to divest its 50% interest in LMS Energy, so FY23 will be the last year progress against target 7.4 will be measured.

Through a continued focus on improvement, risk and opportunity management, and stakeholder engagement, we are making good progress across our goals.

CLOSE THE LOOP								
5	Become carbon neutral by 2030 and achieve net zero by 2050	Target	FY20 Baseline	FY21	FY22	FY23	Progress	Learn more
5.1	Reduce Scope 1 and 2 emissions by 23% by FY25 (market-based)	113.8kt	147.9kt	135.2kt	128.3kt ⁷	101.2kt	✓	Pg 18-23
5.2	100% renewable energy by 2025	100%	0%	19%	37%	84%	↗	Pg 18-23
5.3	Sims Lifecycle Services carbon neutral by 2025	0t	7,126t	6,831t	6,942t	3,938t	↗	Pg 18-23
5.4	Sims Limited carbon neutral by 2025	0t	147.9kt	135.2kt	128.3kt ⁷	101.2kt	↗	Pg 18-23
6	Achieve no waste to landfill							
6.1	Build resource renewal capacity to transform 120k tonnes of ASR per year into new products	120kt	0	0	0	0	↘	Pg 27-28
7	Close materials loops further by expanding capacity and services							
7.1	Close loops by expanding secondary metal volumes to 9,600k tonnes of ferrous (global) and 300,000 tonnes of non-ferrous (North America)	9,600kt 300kt	7,709kt 140kt	6,870kt 147kt	7,664kt 200kt	7,551kt 171kt	→	Annual report
7.2	Repurpose 8.5 million units	8.5M	1.6M	2.1M	2.7M	3.8M	↗	Annual report
7.3	Expand municipal recycling coverage by 50%	750k net tonnes	500k	660k	612k	–	■	Annual report
7.4	Capture methane from landfills outside Australia and New Zealand	50MW	0	0	9MW	9MW	→	Annual report

PARTNER FOR CHANGE								
8	Build trusted relationships with our communities	Target	FY20 Baseline	FY21	FY22	FY23	Progress	Learn more
8.1	Establish at key sites a community index survey; track progress for continuous improvement	Shredder sites	0	0	0	NAM completed	↗	Pg 46
8.2	Annually, invest 0.5% of 3-year rolling pre-tax profits in programs that support environmental stewardship and economic empowerment	Rolling 3-year EBIT average by 2025	0	\$644k	\$605k	\$714k	↗	Pg 47
8.3	Dedicate paid employee time for community engagement/volunteerism activities	Target on number of hours to be set in FY23	0	0	625	724	↗	Pg 47
9	Create new business models that further the circular economy							
9.1	Generate 10% of our EBIT from new business models and opportunities that enable the circular economy (average over FY20-FY25 period)	10% of FY25 EBIT	–	–	3.7%	1.35%	↘	Pg 53

Progress legend

✓ Achieved	→ No change	↗ On track	↘ Off track	■ No longer measured
------------	-------------	------------	-------------	----------------------

7 Restated data

Protecting our climate

As a leader in the circular economy, Sims Limited is focused on reducing emissions from our operations and making our transportation and logistics more fuel-efficient. These efforts ensure we are continuously driving down our carbon footprint and helping to address climate change.

Stakeholders are invited to refer to our FY23 Climate Report for full details on our approach to climate change. The report, which aligns with the Taskforce on Climate-related Financial Disclosures (TCFD), shows how Sims Limited integrates climate-related considerations into our governance, strategy and risk management, and outlines our decarbonisation pathway.

Our climate targets and performance

This year, we achieved our short-term FY25 emissions reduction goal well ahead of schedule with a 32% reduction of emissions compared to FY20 levels. We have also made substantial strides toward our goal to use 100% renewable electricity and announced in FY23 that 100% of our North

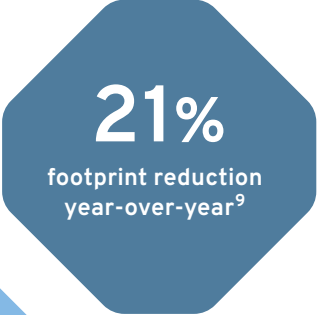
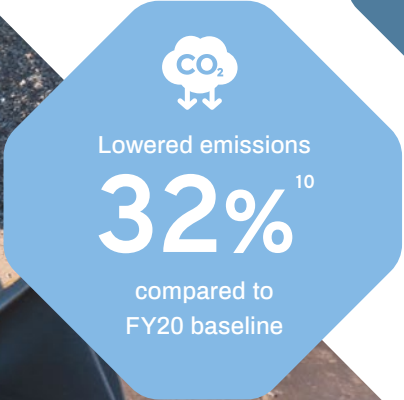
American-operated businesses are using renewable electricity. Globally, more than 110 Sims Limited sites now use renewable electricity, including those in the United States, Canada, New Zealand, the United Kingdom, Ireland, the Netherlands, Germany and Australia (Kwinana). Our long-term goal is to be net zero by 2050.

We have not used carbon offsets to date, prioritising emissions reduction activities. Our approach to offsetting is outlined in our Climate Report.

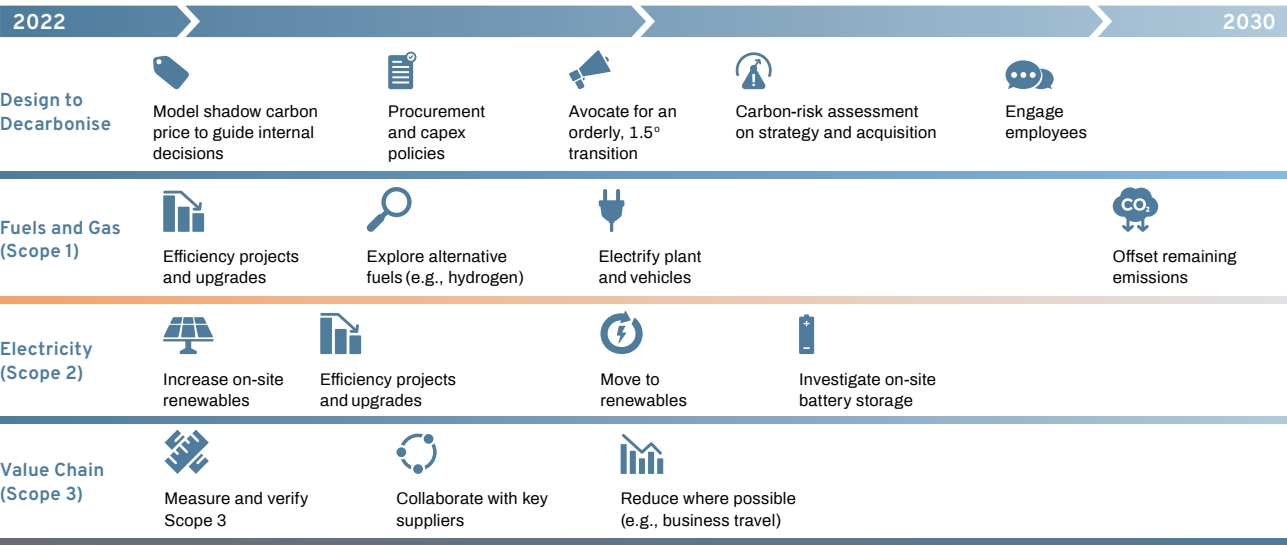
The main sources of our operational emissions in FY22 were diesel (70%) and electricity (24%). Other sources of operational emissions include natural gas and cutting gas (used in oxygen torches). Sims Metal, due to the size and nature of its operations, generates the bulk of our footprint.

Targets ⁸	FY20 Baseline	FY23 Result	FY23 Progress
Short term – Reduce emissions 23% by 2025	147,909 tCO ₂ e	101,211 tCO ₂ e 32% reduction	We have met our initial target of 23% emissions reduction compared to FY20 levels. This has been driven by year-on-year increases in renewable electricity.
Short term – Use 100% renewable electricity by 2025	0%	84%	
Short term – SLS become carbon neutral by 2025	7,224 tCO ₂ e	3,938 tCO ₂ e 45% reduction	
Medium term – All Sims Limited businesses to become carbon neutral by 2030	147,909 tCO ₂ e	101,211 tCO ₂ e 32% reduction	

8 All targets in reference to FY20 baseline; market-based emissions
9 Scope 1 and 2 emissions. Based on FY22 to FY23 levels.
10 Scope 1 and 2 (market-based) emissions. Based on FY20 baseline.



Pathway to net-zero operations



As outlined above, our short-term target has been delivered through the decarbonisation of our electricity supply. Moving to renewable electricity early is of strategic importance, as we seek to displace diesel in our operations through electrification. The majority of Sims Metal diesel use is in mobile equipment in yards.

This year, we concluded a global project that reviewed the procurement of material handlers across Sims Metal, SA Recycling and Richmond Steel Recycling to maximise efficiencies and assess available electric technologies. The comprehensive project aimed to deliver fit-for-purpose units, lower whole-life costs, minimise downtime, and support our values of safety and sustainability. Regional operational working groups were formed to assess available technologies, identify possible applications, develop specifications and techniques, and review designs and case studies, which included site visits to review operation of electric units in other recycling industries. Based on the working groups' recommendations, 24 electric material handlers were included in the FY24 capex budget. Together, these units will reduce carbon emissions by over 2,000 tonnes per year compared to the diesel units they are replacing (once delivered and commissioned).

Sims Metal Avonmouth also commissioned a new electric shear, replacing the existing diesel unit. We also prioritised energy efficiency and conservation projects that deliver costs and emissions savings, including the replacement of the shredder motor this year at Brooklyn, Victoria. The site had observed high energy spikes because of load in the mill, causing increases in energy consumption as well as additional downtime for maintenance. The state-of-the art controllers now regulate mill and motor speed, resulting in greater processing throughput for the same amount of energy. Reducing demand charges from energy spikes has also led to costs savings.

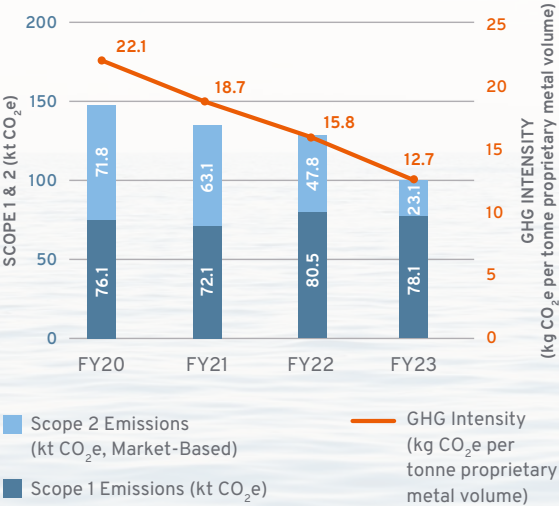


Electric shear installed at Avonmouth, UK, in front of acoustic baffle to contain noise from shredder operations.

GHG INTENSITY

Greenhouse gases can also be expressed relative to another unit, such as revenue or tonnes of production, which is called an intensity metric. This is useful for understanding the relative intensity of GHG emissions compared to Sims Limited's business activity. We have presented this as kg CO₂e per million tonnes of proprietary metal volume. As brokered volume is purchased from independent suppliers and sold without further processing by Sims Metal, it does not have a large impact on our Scope 1 and 2 emissions performance, and it has thus been excluded from the intensity calculation. Emissions relevant to brokered volume (transport, customer processing, etc.) are included in the Scope 3 boundary.

GHG EMISSIONS AND INTENSITY

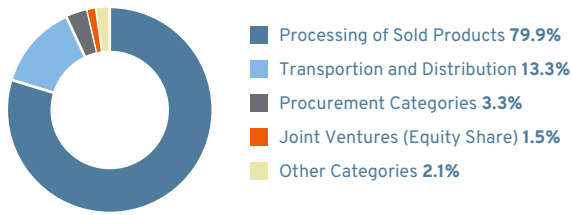


Sims Limited products avoid emissions **>100** times more than our direct emissions footprint

Emissions in the value chain

Scope 3 emissions are those which occur in the value chain, outside of Sims Limited's control. The largest sources of Scope 3 emissions are from the steel and maritime sectors, relating to the processing and freight of our sold product. Sims Limited's ability to make significant reductions to Scope 3 emissions will depend on the decarbonisation of these sectors in line with the Paris Agreement goals. These are two sectors considered hard-to-abate and the pathway for sectors to reach net zero by 2050 is multi-faceted and challenging. A detailed description of the pathways for these sectors and our current position on setting Scope 3 targets can be found in our FY23 Climate Report.

% CONTRIBUTION (RELEVANT CATEGORIES) 4.2M tCO₂e*



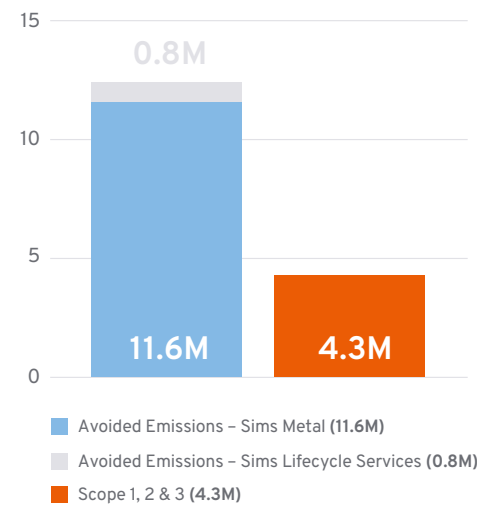
* Due to rounding, may not equal 100%

Avoided emissions across our value chain

The energy from secondary metal production is the largest source emissions in our Scope 3 inventory. However, the energy used for this process is typically less than what is required to make metal products from raw materials, which avoids higher emission volumes. Avoided emissions are not captured under conventional Scope 1, 2 and 3 frameworks. However, the additional lens of avoided emissions analysis from use of Sims Limited's products, complementing conventional carbon metrics, is useful to our stakeholders in examining the opportunities and risks for Sims Limited in the climate transition.

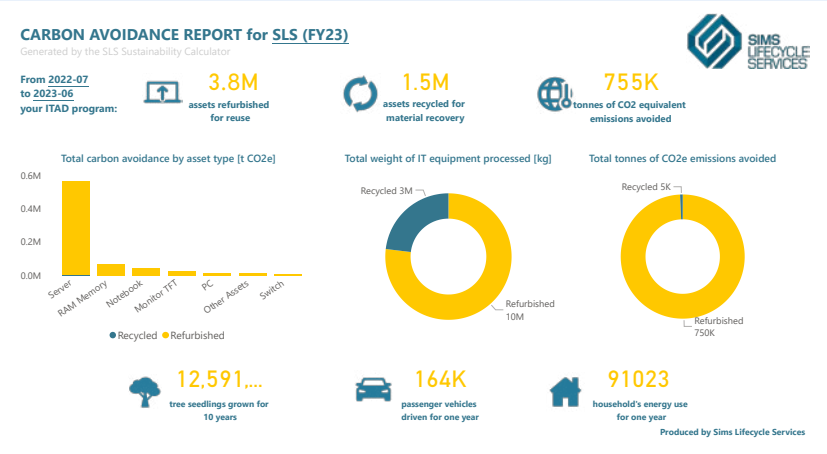
In FY23, Sims Limited enabled more than 12.4 million tonnes of avoided emissions compared to making the same products with materials, with 11.6 million tonnes of emissions from the use of Sims Metals products and 0.8 million tonnes avoided from SLS IT asset disposition (ITAD) services. The scale of avoided emissions from the use of Sims Limited products is more than 100 times the size of our direct footprint.

SIMS LIMITED EMISSIONS IN THE VALUE CHAIN (tCO₂e)



Unlike the GHG Protocol's accounting standards for Scopes 1-3, there is not an accepted methodology for avoided emissions, which are sometimes referred to as "Scope 4." In presenting this analysis, Sims Limited has used the same data reference points and assumptions that informed our Scope 3 calculations. The recycling impact credit has been based on publicly available lifecycle studies, including from WorldSteel, and customised with a global weighted average of our activities, including our direct operational emissions (Scope 1 and 2) and relevant Scope 3 emissions.

SLS REFINES SUSTAINABILITY CALCULATOR WITH NEWCASTLE UNIVERSITY



In FY23, SLS launched their [award-winning](#) sustainability calculator, giving customers insights into the avoided emissions enabled by Sims Lifecycle Services. Using the calculator, we are also able to calculate the total emissions avoided by our customers repurposing and recycling IT assets. For FY23, the total avoided emissions impact was 755 kilotonnes of CO₂e.

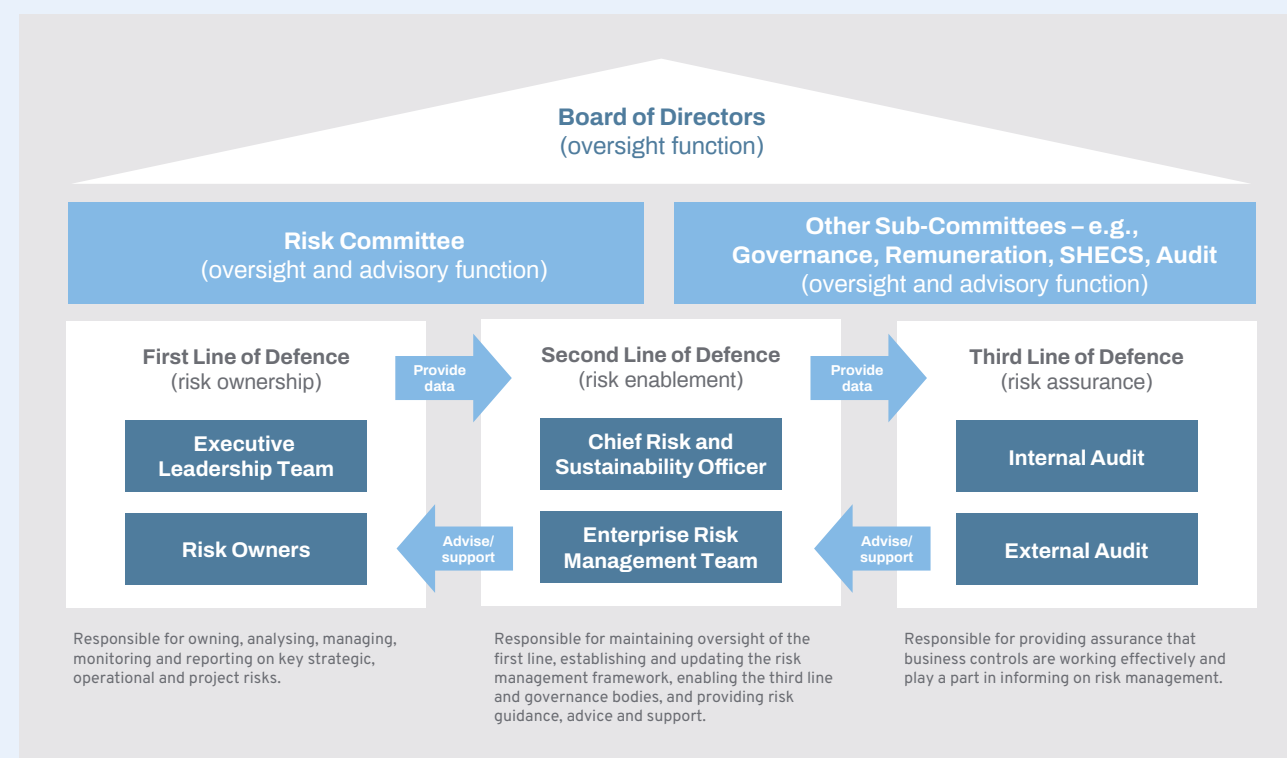
Uniquely, the calculator quantifies avoided emissions not only from

recycling, but also from the reuse of whole IT assets as well as components. During the year, SLS partnered with Newcastle University (UK) to host a graduate student to review the calculator and carry out detailed comparative lifecycle assessments (LCAs) for six of our key products, following the ISO 14044 methodology.

These LCAs allowed us to further refine the database behind our calculator and give full confidence that the results are representative of our global operations. As SLS customers mature their own reporting, they value the increased granularity and insight the calculator can now provide.

Climate governance, strategy and management

Sims Limited's approach to applying risk management and controls is the "three lines of defense" model. Our management teams are empowered to own and manage risks directly as the first line of defence, supported by the risk management team as second line. Internal and external audit represents the third line of defence, with oversight by the Board. The concept behind the model is that each line has a specific role to play in ensuring risks are identified, managed and monitored to prevent harm or loss. Risk management performance is monitored quarterly and reported to the Risk Committee.



Our CEO and ELT have performance metrics and remuneration incentives to hold them accountable for climate performance, which are then cascaded throughout the organisation. For a full discussion on climate governance, including detail on how the board has been engaged in climate-related topics during FY23, refer to the Climate Report.

In informing our strategy, Sims Limited has identified climate-related risks and opportunities over the short (2030), medium (2050) and long term (2070). These occur in relation to both the physical risks of a warming world and the transition to a low-carbon economy. Consistent with the TCFD recommendations, Sims Limited has used scenarios to assist us with understanding these risks and opportunities. Scenarios describe a range of possibilities for the future and provide

a structured way of thinking through uncertainty and making strategic choices. A detailed discussion of Sims Limited's approach and results from the scenario analysis can be found in our FY23 Climate Report.

This year we created a new risk management dashboard that incorporates information about climate risk for all Sims Limited sites, using two different scenarios. The information comes from publicly available sources and considers factors such as water stress, sea-level rise, and temperature rise. The dashboard can be overlaid with additional information about the site, such as demographic information or processed volume, to help provide a holistic risk picture. The dashboard is available to operational and Mergers & Acquisitions teams to inform decision-making.



CIRCULAR ELECTRONICS PARTNERSHIP

While the need to transition to circular electronics has been well-documented, what constitutes a circular electronic product and what a circular system looks like has not been as clear. This year, SLS experts worked with key industry leaders as part of the Circular Electronics Partnership (CEP) to create a much-needed common understanding for the sector and its stakeholders of what key attributes make up a circular electronic product.

The CEP brings together key leaders in the private sector under the secretariat of the World Business Council for Sustainable Development (WBCSD) to drive a coordinated transition toward a circular industry for electronics. It strives to maximise the value of products, components and materials throughout the full lifecycle, using safe and fair labour. As a member organisation, SLS collaborates on multiple projects to address the systemic barriers to this transition, as identified in the CEP [Roadmap](#).

SLS contributed to the CEP's newest publication, the [Circular Electronics System Map](#). The system map recognises three key attributes of a circular electronic product:

1. Made from verified circular resources
2. Designed for effective and efficient circular use and recovery down the lifecycle
3. Used based on circular principles and recovered at the end of their life

The blueprint also outlines what a circular system that enables these products at scale looks like, and maps out 12 systemic enablers to help build a circular electronics industry.

"This system will not build itself," said SLS Lifecycle Engineering Manager Sophia Runau, who collaborated on the report. "The work we do at SLS involves working with our customers, suppliers and downstream vendors, and contributes to making a fully circular system for electronics a reality."

Focus on continuous improvement

As a leader in our industry, we have a long-held commitment to environmental stewardship, which is embodied in our purpose.

Our approach to reduce environmental risk follows the same methodology as reducing health and safety risks. We proactively, rather than reactively, assess our risks, implement control measures, and continually evaluate and assess the effectiveness of those controls. This method of action puts us on the front foot in identifying control gaps, giving us the ability to determine what controls need improvement. These efforts drive continuous improvement as we strive to systematically standardise best-in-class protections globally.

Maintaining high performance and managing risks

Our Environment, Health & Safety policy demonstrates our commitment to implementing and exceeding best practices concerning environmental issues. We apply this policy across all operated companies and have a standard dedicated to effectively integrate acquired businesses into the Sims Limited EHS framework. In FY22, our operating model changed to combine our experienced environmental managers into a function in which our specialists can more effectively share best practices and experiences with one another and with the operations managers, with whom they interface.

In FY23, the team continued to build on this foundation with strong results, including:

- 2,845 personnel completed environmental training modules based on our Environment standard requirements
- 441 internal environment site inspections generated 777 improvement actions globally
- 807 environment management critical control verifications (CCVs) led to 519 improvement actions

During the year, the team also dedicated considerable effort toward the development and standardisation of an aspects and impacts register. This tool is designed to better understand the areas of our operations that might affect the environment; the potential impact on different parts of the environment, such as water, soil and air; and most important, the various controls and mitigation approaches in place to reduce the potential risk of these environmental impacts. The aspects and impacts assessments were coordinated and completed at all shredder sites by our environmental partners and specialists. The assessments identified opportunities to improve infrastructure, control measures, associated Critical Control Verifications (CCVs), training and document management. In FY24, this assessment will be extended to 50% of our operating sites, with a goal of full company completion by end of FY25.

External insight

Building on the third-party environment assessment of North American shredder sites conducted in FY22, this year saw the completion of external assessments of shredder sites in the United Kingdom, Australia and New Zealand. The assessments were designed to validate compliance with applicable environmental legislative requirements covering areas such as stormwater, air emissions and leaching, and identify any non-conforming requirements to our own EHS standards. Mirroring the North American results, no major findings were discovered, and we acted quickly to address items identified. All improvement actions were managed and monitored through our EHS data management system.

Investing in performance

We continuously invest in technology and efficiency projects to enhance environmental performance. In addition, we consider environment impacts and benefits in all capex projects across Sims Limited.

ADVANCED AIR EMISSIONS CONTROLS

Metal shredding is a mechanical process in which high-powered machine hammers deconstruct end-of-life metal products such as cars, large appliances and demolition waste to separate ferrous and non-ferrous metals from non-metallic materials. The material that remains after metals are removed is referred to as automobile shredder residue (ASR). ASR is typically disposed via landfill, where it is also often used as an alternative daily cover material (particularly in the United States). ASR will form the input to our new business division, Sims Resource Renewal (find more information on page 27).

The metal shredding process generates direct emissions to air. This may be in the form of steam (because of water sprayed inside the shredder) and particulates such as dust. Volatile organic compounds (VOCs) can also be emitted, mostly due to residual levels of petroleum products in shredded vehicles. To minimise VOCs, Sims Metal applies rigorous controls prior to shredding materials, including the removal of fluids such as oil and fuel for recycling (depollution).

In sunlight, VOCs react with nitrogen oxides (from sources such as vehicles and power plants) to form ground-level ozone, which in turn contributes to the formation of fine particulates in the air. Fine particulates may have health effects such as eye and throat irritation and headaches.

Historically, it has been difficult for metal shredder operators to measure emissions or to direct them to a stack for treatment. However, as technology progressed and shredders were enclosed, VOCs can now be directed to a stack, measured and treated. To date, there are only a few metal shredder operations in the United States that have applied this advanced emissions control technology.

Sims Metal has determined that it is appropriate for some US facilities to be fitted with these controls, based on factors such as the size and location of the metal shredder, the feed rate and mix of shredder feedstock materials. Sims Metal has been actively working with the US Environmental Protection Agency (US EPA) and individual state EPAs to permit, design and implement such controls. Based on our assessments, Sims Metal will be installing emissions controls on its shredders in Chicago, Illinois; Jersey City, New Jersey; and Morrisville, Pennsylvania; with environmental capex allocated in FY23 and beyond.



2,845

Sims Limited employees
completed environmental
training in FY23

WORKING IN PILSEN

Sims Metal has operated in the Pilsen neighbourhood of Chicago for over 30 years. The facility is in a diverse area of Chicago with environmental justice (EJ) concerns. Sims Limited is committed to listening to, and working with, the Pilsen community to ensure that the local residents enjoy the same opportunity for a safe and healthy environment as is available to other Chicago residents, and to ensure that the local residents have a voice in local land use decision-making.

Citywide, concerns have been raised about the cumulative impact of industrial activities, especially in Chicago neighbourhoods considered to be EJ areas. This has led to questions raised by some community members about the potential impacts of Sims Metal's long-standing operations, particularly relating to shredder operations, especially as Sims Limited has applied for renewal of its city recycling facility permit, with a substantially more extensive set of operating requirements than the prior permit.

In furtherance of our commitment, and to help allay concerns about potential impacts of our operations on the community, in 2021 Sims Metal committed to install advanced emissions controls for its metal shredder, including controls for destruction of VOC emissions, in agreement with the City of Chicago. The permit to construct the control was granted in September 2022, and since that time, Sims Metal has been monitoring the air around its facility from five monitoring stations, a requirement from the US EPA to address community concerns prior to completing installation of its advanced emissions controls. Results to date have been positive, with the US EPA publicly reporting that current emission levels have shown no risk of short-term health effects, noting additional monitoring is required to evaluate the risk of long-term health effects. Sims Metal also has undertaken several other operational improvements to address community concerns, including additional dust control measures.

We understand that the Chicago metal shredder will be the smallest shredder in the United States with these advanced emissions controls, and one of just a handful nationwide. The state-of-the-art system was designed to meet the stringent emissions control criteria of both the US EPA and the Illinois EPA, and is currently being fabricated, with installation in 2024.

Engagement with the local community in and around Pilsen, where we have operated and built relationships for more than 30 years, has been and continues to be our priority. We continue to provide in-person sessions and a [virtual engagement room](#) in different languages to give community members an opportunity to learn more about our operations and the proposed controls, and to express any concerns. We take the community's feedback very seriously and have incorporated feedback and learnings from Pilsen into our broader Sims Limited social licence framework, risk management and community impact frameworks.

SUPPORTING RELOCATION OF PILSEN'S FOOD PANTRY

Sims Metal employees helped the Pilsen community in Chicago relocate the Pilsen Food Pantry to a new, expanded location and assist with renovations. The new pantry will support not only a food pantry but also a clothes closet for residents and various wellness programs. However, the new location was in need of significant renovations, and Sims Metal employee rolled up their sleeves to tear down old kitchen cabinets and walls to ready the space for reconstruction. Sims Metal also donated \$50,000 to support the project. [Read more](#) about Sims Metal's ongoing support of the Pilsen Food Pantry and Food Pantry Relocation.



Sims Metal personnel conduct non-ferrous metal sorting training with employees at Smithfield Transfer Station, operated by Cairns Regional Council, to improve recovery quality.

Resource stewardship

Water

Water is a key natural resource, and the impacts of a changing climate highlight the importance of water stewardship. Water (predominantly mains water) is not an input into Sims Limited products, but is important to dust suppression and firefighting activities. Water efficiency initiatives include high-pressure water atomisers for dust control, smart water and foam systems for shredder dust and temperature control, and water recycling. During FY23, Sims Limited water usage remained consistent with FY22 levels. More details on water usage are available in the FY23 Sustainability Databook.

WATER WITHDRAWALS BY BUSINESS UNIT (GL)

Business unit	FY23	FY22	FY21
Sims Metal North America	0.36	0.33	0.30
Sims Metal APAC	0.14	0.15	0.14
Sims Metal UK	0.07	0.08	0.07
Sims Metal Recycling	—	0.01	—
Sims Lifecycle Services	0.01	0.01	0.01
Total	0.57	0.57	0.52

Waste

Automotive shredder residue (ASR) is the largest single waste stream Sims Limited produces, and it is currently disposed of by sending to landfill or energy recovery (in some regions). ASR is the non-metallic residue that is left behind after shredding metal-based goods, such as cars, washing machines and shopping trolleys, in order to recover the metal for recycling. In FY23, Sims Limited

generated more than 1.1 million tonnes of ASR, which cost over \$100 million to send to landfill. Sims Limited seeks to minimise the generation of ASR via quality control of input materials and improving the shredding process itself, through investing in technologies to improve separation of the shredded inputs. We also work with customers to educate them on sorting and collection processes that minimise waste.

We are also investing in technology to convert ASR into valuable products through Sims Resource Renewal (SRR). Because ASR is non-homogenous and it is very difficult to physically separate the different materials included, it cannot be further recycled using common methods – like those used to shred and separate metals.

To solve this, SRR is developing a new method for treating ASR that uses advanced plasma gasification technology, combined with a specially designed treatment process. This flexible and innovative process can also be applied to other waste streams that, in line with the waste hierarchy, do not have any other appropriate treatment method.

By taking ASR and using it as a resource to create valuable products such as olefins (building blocks of plastics) and hydrogen, as well as by-products from our hydrogen production process (such as construction aggregates and carbon dioxide for industrial use), we stop ASR from being thrown away and enable material reuse within the circular economy.

During FY23, Sims Limited invested \$22 million in the development and commissioning of the demonstration plant in Rocklea, Queensland. The purpose of this facility is to validate the technology and the qualities of the gas



Construction of the Sims Resource Renewal demonstration plant at Rocklea, Queensland

and vitrified products produced. Our priority is safe operations, as this phase also includes testing of startup, shutdown and emergency response procedures. The demonstration phase, which will continue in FY24, will include customer, community, government and regulator engagement to build understanding and confidence in this innovative solution.

Our FY25 target was to process 120,000 tonnes of ASR into new products. As SRR is still in the demonstration phase and we pursue a disciplined commercial plant development process, we do not believe that we will meet this processing capacity within the next two years. We still retain our medium-term target of transforming 1 million tonnes of ASR into new products by 2030, in line with our purpose, to create a world without waste to preserve our planet.

LANDFILL WASTE GENERATED BY REGION (kt)

Region	FY23	FY22	FY21
Sims Metal North America (including SMR)	724	852	731
Sims Metal APAC	234	220	242
Sims Metal UK	167	163	189
Sims Lifecycle Services	2	2	3
Total	1,127	1,237	1,165
Tonne waste per tonne of ferrous proprietary volume ^(b)	0.16	0.16	0.17

Sims Metal reports a small amount of hazardous waste, mainly in the form of oils and fuels removed from the depollution of end-of-life cars prior to the metal recycling process. These recovered fuels and oils are recycled. Personnel performing depollution receive appropriate training on the safe performance of this task, including handling and storage of recovered fluids to prevent harm to health and the environment.

Nature and biodiversity

In December 2022, the Kunming-Montreal Global Biodiversity Framework (GBF) was adopted at the United Nations Biodiversity Conference (COP15), aiming to address biodiversity loss, restore ecosystems and protect Indigenous rights through concrete measures to halt and reverse nature loss. Included in the agreement is an increased expectation on the private sector to regularly monitor, assess and disclose risks, dependencies and impacts on nature. By extending the use of products and materials, the circular economy can make significant contributions to biodiversity conservation and help organisations reduce impacts on nature in their value chain.

As Sims Limited's input materials are end-of-life goods, our exposure to nature-related risks in the supply chain is not material. Whilst we do depend on water for dust suppression, more than 95.5% of water is from municipal supply, and we invest in water recycling and efficiency projects to minimise water withdrawal.

During FY23, we republished our nature and biodiversity policy to articulate our commitments and goals more clearly. We also began moving through the Taskforce on Nature-related Financial Disclosures (TNFD)'s LEAP (Locate, Evaluate, Assess, Prepare) framework to begin considering nature risks and opportunities in a structured way.


In our aspects and impacts register, we have considered the local environment through both direct impacts and the impacts of controls, and we will continue to iterate this in line with the LEAP framework. As part of this year's efforts, we have integrated consideration of nature into our social licence assessments and as a priority area in our community impact framework.




CELEBRATING EARTH DAY

Our team of environment, health & safety specialists coordinated a global effort between Earth Day (22 April) and World Environment Day (5 June) to get out and about in our local communities. Teams across the world took part in a variety of activities including tree plantings and litter clean-ups in their local areas, partnering with a diverse range of local charities and communities.

The Circular Economy and Nature

~90% 
of biodiversity loss and water stress is attributed to resource extraction and processing¹¹

~80% 
of global metal extraction in 2019 occurred in the world's most species-rich biomes


90% 
of mining sites are in areas of relative water scarcity
~50% of extraction occurred >20 km from or even within protected areas¹²


One tonne of recycled metal...


STEEL

Avoids mining of **1,100 kg** of iron ore, **630 kg** of coal and **55 kg** of limestone

SAVES

 **642** kWh of energy


 **1.8** barrels of oil

 **2.3** cubic metres of landfill space¹³

COPPER

Avoids >**5,900 litres** of water use and **over a tonne** of solid waste¹⁴


SAVES


 **85%** of energy compared to primary production¹⁵


ALUMINIUM

Avoids mining of about **8 tonnes** of bauxite ore¹⁵

SAVES

 **14,000** kWh of energy

 **40** barrels of oil

 **7.6** cubic metres of landfill space

By reducing the need for raw materials through circularity, we can reduce pressures on nature.

11 <https://www.resourcepanel.org/reports/global-resources-outlook>
12 Luckender et al https://www.sciencedirect.com/science/article/pii/S0959378021000820?ref=pdf_download&fr=RR-2&rr=7f46a97c8c0faabe

13 <https://www.bir.org/the-industry/ferrous-metals>
14 Department of Environment, Climate Change and Water NSW (2010). Environmental Benefits of Recycling
15 <https://www.bir.org/the-industry/non-ferrous-metals>

Advancing a culture of safety and health

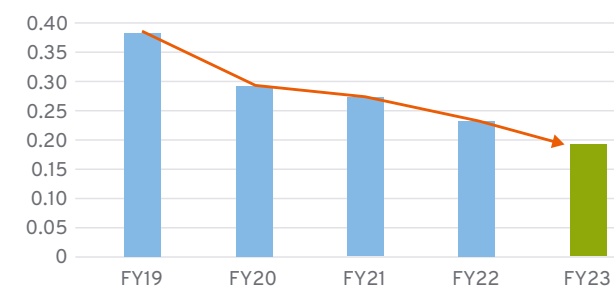
Sims Limited's EHS continuous improvement strategy continues to deliver best-ever safety results, consistently driving positive change.

For the fourth year in a row, we have seen the lowest-ever number of recorded injuries in our company's history. With continued focus on our Critical Risk Management program, we also remained fatality-free over the same time period.

With enhanced critical risk awareness, standard requirement specificity, globally consistent enhancement of control measures, and a consistent safety culture improvement approach, each EHS strategy component has been successfully adopted to meet the needs of our business.

Sims Limited's metrics, targets, methods and goals are evolving to reflect our future state cultural objectives: to foster sites with strong trust-based relationships between management and employees, where mistakes, process failures and improvement ideas are openly discussed in order to drive new, innovative levels of systematic control and provide a safe work environment.

LOST TIME INJURY RATE (LTIR)

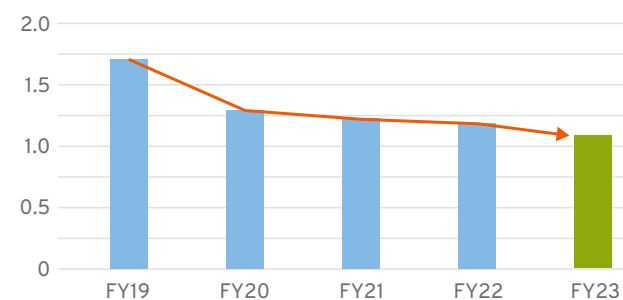


▼ **50%**

Reduction in Recordable and Lost Time injuries

FY19 vs. FY23

TOTAL RECORDABLE INJURY FREQUENCY RATE (TRIFR)



▼ **36%**

Reduction in TRIFR

FY19 vs. FY23



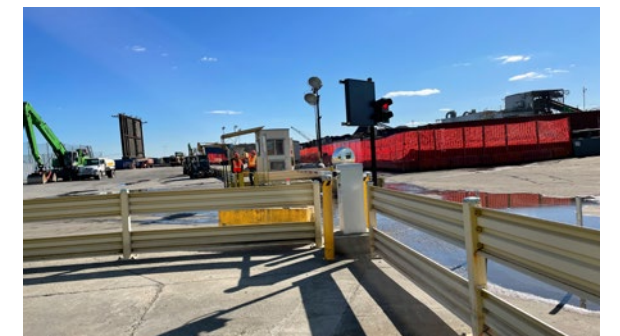
4 YRS

in a row having lowest-ever number of recorded injuries in our company's history on record

Critical risk focus

Sims Limited's multi-year safety strategic plan addresses fatal risks. Critical control verifications have been designed to identify and address key safety risks in our operations. These risks were initially identified based on a global 10-year incident taxonomy study and are now identified and refined through continual feedback from operators and management on our sites.

Risk awareness is improving as a result of our leading indicator program and proactive reporting. Of the critical risks reported, nearly half of these were near-miss events, a significant increase from previous near-miss reporting records. Our Critical Risk Management program targets high-risk areas that require year-over-year assessment of control measure effectiveness. In FY23, we maintained our focus on the critical risk of traffic management. Control measure enhancement continued throughout the year, with further work performed on protected walkways, traffic controller protection and protected driver waiting areas. More than 1,400 traffic management corrective actions were generated in FY23 globally, demonstrating Sims Limited's ongoing commitment to improve.



Claremont Terminal in Jersey City, New Jersey – protected traffic controller hut



Claremont Terminal – protected walkway

Growing and evolving our safety culture

This year, we conducted the DuPont Safety Perception Survey to measure how perceptions and attitudes toward safety have changed since our baseline survey in FY19, the year we began our Critical Risk Management journey. The company's relative culture score improved from 71 to 73, well above the waste industry average.¹⁶ This year's survey demonstrated improvement in key cultural areas, including continuous improvement initiatives, leadership training, employee recognition and employee EHS program inclusion. The improvement in employee perception, particularly field personnel, in areas that are built into our long-term EHS improvement strategy was an important marker of the effectiveness of our strategy.

After two years of coordination, in late FY23 we began the rollout of the Leaders Commitment@Sims program. The first phase of the program, called Commit to Care, focuses on EHS principles, including how to develop psychological safety and relationships built on trust between employees and management. Designed in consultation with external experts, Commit to Care delivers facilitator-led training to global leadership, from front-line supervisors to the ELT.

Initial review of the program has been met with great enthusiasm and support from our leaders. Planned modules of the program will be rolled out by mid-FY24.



16 Waste industry average of 49 provided by DuPont DSS+

As we look to further implement the concepts contained in our Commit to Care global training in FY24, so will our focus on measuring and reporting safety performance. Our metrics will shift to monitoring and addressing concerns flagged by our leading indicator program. While Sims Limited will continue to measure and publish TRIFRs and lost time injury frequency rate (LTIFR) for benchmarking purposes, no targets have been assigned in FY24. Instead, measurable performance goals have been set to ensure ongoing commitment to critical control verification, EHS general inspections, corrective action assignment, action completion, critical risk incident learning and EHS training completion.

This shift represents a cultural milestone and is a testament to the firm belief in Sims Limited's safety program, where strategic, proactive and targeted efforts, applied by all company leaders, will demonstrate a reduction in risk and harm.

Third-party management

We employ large numbers of contractors to carry out many different tasks. Where Sims Limited hires contractors and directs and controls the work (such as labour supplementation), these people are a part of our standard safety systems and controls. A large portion of our Australian and New Zealand operations utilise a third-party contractor management system, which in FY23 was extended into North American sites. The system will greatly assist in managing contractor site access, training and standard requirement compliance, helping to ensure that pre-qualification and safety induction checks are completed prior to site arrival and aid in clear communication of any risks. In FY24, this will be rolled out to sites in Europe and remaining sites in Australia and New Zealand.

Our approach to contractor safety includes escalation to the service providers and site bans where practices fall below our EHS standard requirements. This also includes customers, suppliers and members of the public.



MANAGING EHS AND GROWTH

In line with our strategy for growth, Sims Limited has made strategic acquisitions, which we are now well-practiced at integrating into our safety culture. During acquisitions, due-diligence processes are in place to identify any issues with health, safety and environment, and identify improvement actions (including capex requirements), as early as possible. In FY23, our process for integrating mergers and acquisitions into our EHS management system was formalised with the release of a new EHS standard and the appointment of Lee Ann Scott into a new role as EHS director – Global, Integration. Recently, we talked to Lee Ann to learn more.

Why was this standard developed?

Lee Ann: When acquisition activity occurs, it brings about a lot of change for people on both sides. When we are introducing new businesses to Sims Limited's EHS management system, including standard requirements, control measures and EHS programs, we want to make sure that people understand how it all fits together. We want to get our new colleagues excited and enthusiastic, not overwhelmed! Having a structured approach with gateways – right from due diligence to handover, involving the appropriate EHS regional representative – helps us achieve this.

What does integrating a new business involve?

Lee Ann: After the initial due diligence and introduction stages, we always start with a facilitated critical risk (fatal risk) assessment. We'll discuss the system and roles, key findings from any critical control verifications, or CCVs, risk assessments and any changes that will be required at sites – and importantly, why the changes are needed. A full list of corrective actions will be generated and prioritised, so we're dealing with critical risks first. I work with the site leadership and new business unit to go through that list regularly, helping to move through it, identify controls, get through any roadblocks and identify budgets. It's very hands-on. We take before and after pictures and discuss how to address the risks and how to log the risks into our systems as evidence, so it's learning by doing. Everyone is also growing familiarity with our EHS standards and training courses. This is done in a tailored way, so that the risks are prioritised at the sites.

What's the best part of your job?

Lee Ann: The best part about this role is that I can see all different parts of the business and learn how each function affects the others. I have been introduced to so many people who I may never have met otherwise. There are so many opportunities to display teamwork in this position, and I think that is the best part – working with a great team.



Fire prevention

Fires continue to be a significant business risk for Sims Limited. Most fires on sites are extinguished quickly, and Sims Limited has well-established processes and capabilities in place to manage potential incidents. Across our global footprint, we continually work to enhance our fire mitigation plans by improving how our operational teams identify, control and respond to fire risks. This includes investigating innovative and new technologies and practices as the threats our sites face evolve.

An emerging challenge faced by our Sims Metal operations is the increased presence of lithium-ion batteries in recycling streams. Lithium-ion batteries have become a challenge for the metal recycling and waste-handling industry due to the pervasiveness of these rechargeable batteries in everyday goods such as vapes, electric bikes and scooters, power drills and electronic goods. Sims Metal does not accept lithium-ion batteries at its facilities and combines supplier education with robust inspection processes to enforce compliance. Despite our best efforts, at times these rechargeable batteries do pass through undetected.

The problem with lithium-ion batteries is they can potentially overheat, which can cause a cell inside the battery to short-circuit and release flammable gas. This can trigger a reaction inside the sealed battery called “thermal runaway,” where temperatures can reach highs of 500°C. At this point, batteries ignite.

The number of fires at our sites where batteries represented the likely cause of fires has doubled since FY20. Now they represent the likely cause of

approximately one-third of the total fire incidents we experienced in FY23. We believe these batteries were a likely source of ignition of serious fires that occurred at Sims Metal facilities during FY23 at Auckland, New Zealand; Hull, UK; and Redwood City, USA (FY22). We recognise and regret the disruption and concern that incidents of this type can cause to our neighbours and communities. When a fire occurs, we work collaboratively with emergency services to extinguish fires and incorporate learnings from incidents into our management processes.

Across our operations, we are actively working with industry associations and engaging with other stakeholders, including governments and suppliers, to raise awareness of the risks associated with lithium-ion batteries and the need for greater public education on the correct disposal pathways for these items.

Sims Metal focuses on fire prevention through early detection and rapid response. Fire extinguishing techniques and detection tools are regularly tested and practiced. As an example, we continue to test early warning systems that use thermal cameras supplemented with AI analysis, to help detect fires, before they have a chance to spread. Trials and continuous improvement of the algorithm that supports analysis are continuing, with plans to integrate automatic fire suppression into our systems. While trials are finalised, either on premises fire watch security or a thermal camera system are being implemented at priority sites globally. The camera system is remotely monitored by a third party, who can deploy water suppression from a cannon mounted at the site.

Promoting physical and mental well-being

Across Sims Limited, we support employee health and well-being programs as well as mitigating risks to health and safety. We provide access to employee assistance programs (EAPs) across the global business – free, confidential, independent helplines that provide advice and support across multiple dimensions including stress management, drug and alcohol use, parenting and relationships, and work/life effectiveness. Throughout the year, we also mark mental health awareness days such as R U OK? Day in Australia and Tea & Talk Day in the United Kingdom through site events and digital communications. During the year, our employees can also participate in different events that promote well-being in their communities.



Sims Metal volleyball team at the Corporate Games in Brisbane, Australia



Sims Metal New Zealand team members “do something blue to get your mate through” to raise awareness of prostate cancer and fundraise for the Prostate Cancer Foundation NZ – Te Kahui Māte Pukupuku Repe Tātea o Aotearoa



Sims Metal team members cross the finish line at the Carrera de los Muertos®/Race of the Dead, a 5K fundraising race in Chicago's Pilsen neighbourhood



Sims Metal and Sims Resource Renewal employees take part in Clean Up Australia Day Activities at Rocklea, Queensland



Sims Lifecycle Services team members build garden beds at Mission Garden, Tucson, Arizona. Mission Garden is a living agricultural museum of traditional food plants from the Sonoran Desert area.



A Sims Metal employee plants flowers at the entrance of our Gatton Road site in Bristol, England, for World Environment Day



Sims Metal team members from East Chicago, Indiana, plant trees for Arbor Day

Cultivating a diverse workforce

At Sims Limited, we are committed to building a more diverse workforce and more inclusive workplace by investing in employee development and opportunity, cultivating a welcoming culture, and supporting diverse communities where we operate.

Diversity, equity and inclusion (DEI)

DEI Strategic Framework

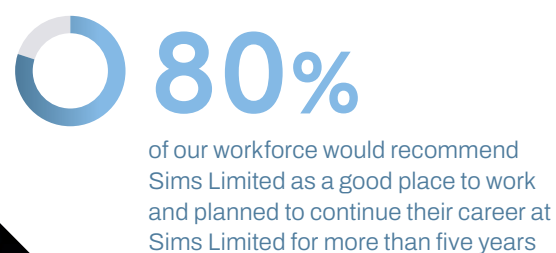
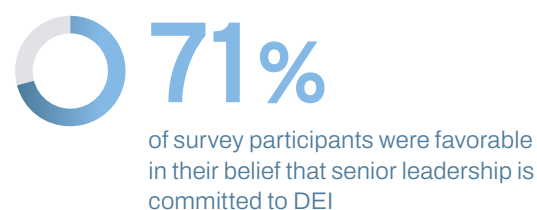
In late 2022, we engaged external subject matter experts to complete a diagnostic review to inform and shape our next five-year Diversity and Inclusion strategy. The review consisted of an analysis of current policies, procedures and practices, interviews with executive leaders, and a global survey to gain insight to the lived experience of inclusion at Sims Limited. This was the first survey of its type to be made available to all employees, including hourly paid employees at yards, with an uptake of 55% of the employee population globally.

Following this review, workshops were held with the ELT and regional senior leadership teams to review the results and determine the roadmap for the next five years. The survey and workshops highlighted areas that will be included in our strategy, including:

- Developing inclusive leadership techniques with managers and leaders
- Advancing people from underrepresented groups into supervisory and leadership roles
- Continuing to give our people ways to be involved in decision-making and to provide and communicate channels for feedback
- Further engaging with and supporting diverse communities where we operate

Initiatives from the DEI strategy are currently being prioritised for rollout in FY24 and beyond.

Feedback from the survey reinforced key strengths of the organisation, including:



LEARNING FROM DIVERSE VOICES

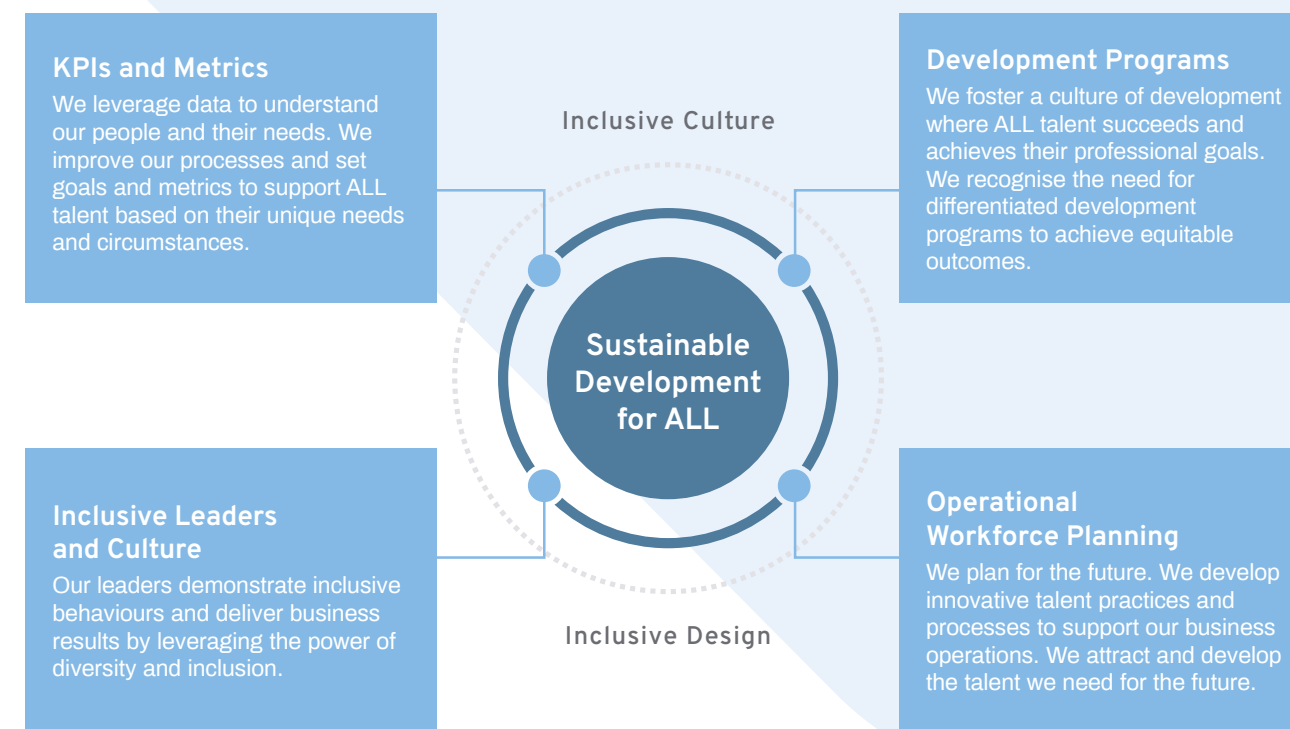
Throughout the year we facilitated a guest speaker and study series to increase awareness of challenges faced both historically, and today, by underrepresented groups in our communities. Our aim is to promote both understanding and action to create a more inclusive environment. We welcomed:

Shawnee Benton Gibson, co-founder of the ARIAH Foundation and CEO of Spirit of a Woman Leadership Foundation, to discuss the history of Juneteenth; the Black experience; the intersection of resistance, resilience, freedom, joy and family; and ways that allies can make workplaces more welcoming.

Kim Clark, author and media communicator, who presented information on the historical and social context of Pride Month, and pertinent statistics to showcase the challenges faced by the LGBTQ+ community. Clark also stressed the importance of ally awareness and participation.

Roy Ah See, entrepreneur and social and emotional health advocate, who shared his personal story of overcoming adversity as a proud Wiradjuri man, and helped employees understand the Voice to Parliament from a First Nations perspective, as part of marking NAIDOC Week.

Each of the talks was livestreamed so employees could dial in and participate remotely, and recordings were made available afterward. We also held study groups for the first time this year; a book club, in which book selections examined American history and the ongoing impact of racism on Black communities; and a movie club for American Asian Pacific Islander Month. The study groups were well received, and we will continue to incorporate both approaches in our program.



Gender diversity

It has been our focus for many years to increase the representation of women in our businesses. We are proud to maintain the early achievement (FY22) of our FY25 target to have 25% women in senior leadership roles. Of the external new hires appointed to director level or above during FY23, 35% were female.

Externally, we have worked to make the content of our marketing and recruitment materials more inclusive. This has included ensuring we use gender-neutral language in advertising, ensuring diversity in imagery, and increasing the focus on our purpose and sustainable businesses. We are monitoring the number of women applicants in response to these changes.

During the year, our organisation committed to the [40:40 Vision](#), an investor-led initiative seeking to achieve gender balance in executive leadership across all ASX300 companies by 2030.

Pay equity

In FY22, Sims Limited adopted a global methodology for calculating the gender pay equity metric to unify what had previously been a disparate set of country-level metrics, driven by local regulatory requirements. This helps us provide to stakeholders a more consistent view of our efforts to combat the inconsistencies in gender pay practices as a global organisation.

During FY23, each of our regions devoted a portion of the annual pay increase budget to address gender pay equity. As a result of these focused actions, the gender

pay equity metric decreased from 8.2% to 2.9% by fiscal year-end. As follow-up to the gender pay equity review, we also took the opportunity to conduct an ethnicity pay equity gap review in our North American business. This analysis shows the difference in the average pay between all Hispanic, Black and other minority ethnic staff in Sims Limited compared to white staff. The gap was not large, and some corrective actions were taken during FY23 to narrow the gap, which we will continue to monitor.

Women Leading @ Sims Limited

As part of our strategy to expand career development and leadership opportunities for women, the Women Leading @ Sims program was launched in 2021, and the second cohort commenced in August 2022. This program provides learning experiences and internal networking opportunities for key talent to further expose them to our strategic and transformational initiatives.

The program is guided by an external facilitator and executive leadership coach, and participants receive peer coaching to enhance their unique leadership capabilities and broaden their perspective on Sims Limited's business portfolio. In addition, participants have the opportunity to connect directly with members of our Board of Directors and executives from across the Sims Limited's business portfolio. With the culmination of this program, these leaders are now armed with a combination of knowledge and experience that gives them an elevated view of the entire company. The program continues to receive positive feedback, and a third cohort has been confirmed for FY24.



35%
of hires appointed
to director level or
above were women
in FY23



Sims Limited early career programs: Building diverse pipelines of talent

Historically, our early career talent programs have focused on bringing a broad diversity of candidates to the metal recycling industry. In FY23, the program expanded its focus and offered placements in Sims Lifecycle Services for the first time. The program targets those completing an undergraduate program at university or technical colleges. We also accept internal applications from young people already working at Sims Limited.

In FY23, 50 young people globally began their circular economy career with Sims Limited. Of the 50 participants, 40% are women. In the United States, seven of the 15 participants are from underrepresented cultural backgrounds, a deliberate strategy to build the pipeline of leaders of colour in our industry.

While the program is managed at a regional level, globally consistent practices have been adopted, including:

- Rotational assignments to build participant knowledge and understanding of the business, setting them up for success to progress into supervisory or professional roles;
- Regular forums that invite all participants to engage in a learning activity, build peer relationships and provide feedback on program effectiveness;
- Individual sponsors for each participant to ensure continuity of support throughout the rotational program. These sponsors maintain oversight of and are invested in participants' career progression.

EARLY CAREER TALENT PROFILES



Ashley Lourenco, Buyer Trainee, Sims Metal North America

Start date: February 2023

What has been your role and development experience to date?

My role and development to date has been learning full knowledge of processing scrap and the systems necessary to engage with both ferrous and non-ferrous metals in the commercial and operations side of business.

What have you gained from participation in the Sims Limited early career program?

From currently participating in the Sims Metal Buyer Trainee program, I have developed new skills in terms of analyzing scrap material for purchase and learning to weigh out options to make decisions confidently. Meanwhile, I'm also growing my understanding the importance of work safety, strengthening work ethics, and learning how to interpret price trends.

What do you enjoy about your role?

What I enjoy most about the Buyer Trainee role is staying current with the industry trends, and taking part in recycling metal to reduce energy and turn waste into reusable material.

What excites you about the career opportunities available at Sims Limited?

I am excited to take part in projects, work alongside reliable team members and explore what Sims Limited has to offer.

Kristie Bui, Sims Metal Operations/HR, New Zealand

Internal Candidate – Start date: July 2022

What has been your role and development experience to date?

I excel at bridging the gap between front-line staff, management and the senior leadership team. I recognise the unique challenges faced by each group, such as varying levels of experience, job requirements and knowledge. I understand how different functions within the company are interconnected and support one another. This allowed me to identify areas for improvement between roles in different departments, even if they don't directly report to each other. I've been involved in assisting yard managers with recruitment and handling other employee relations matters, managing projects and writing reports.

What have you gained from participation in the Sims Limited early career program?

I've gained comprehensive knowledge of the company's operations, its purpose and its impact on the community. I've been able to encourage and influence others to align with our values, understanding and supporting the roles our staff play, and the broader community we serve. I now approach projects and tasks from a management perspective, considering the bigger picture and how to achieve the most effective outcomes. This is a significant shift from my previous role (as a weighbridge officer), where I wasn't exposed to these different perspectives.

What do you enjoy about your role?

The reason I enjoy my cadetship is the people I work with and assist. The team's extensive knowledge about the industry and their passion for what they do contribute to a positive work environment at Sims Metal, benefitting both the company and the environment.

What excites you about the career opportunities available at Sims Limited?

My career aspiration at Sims Limited is to continue learning and strategically shaping a more organised and thoughtful approach to recruitment and talent management. I aim to establish Sims Limited as a desirable career brand, making it the next generation's dream workplace. While I cherish my time at Sims Metal Auckland, I believe I can flourish in other Sims Limited locations globally as well due to my eagerness to learn, thirst for knowledge and passion for our people.



Grace Lee, Graduate Engineer, Sims Metal United Kingdom

Start date: August 2022

What has been your role and development experience to date?

My first rotation was in Maintenance Engineering in Avonmouth, moving then to Nottingham to assist with the preshredder installation, and now just starting an out-of-function rotation working with Human Resources to introduce engineering apprentices to our business.

What have you gained from participation in the Sims Limited early career program?

I have gained a lot of practical experience and appreciation for how designs must account for manufacturing techniques, maintenance access and repairs. Having discussions at different Sims Metal sites has deepened this understanding and helped me to share knowledge better across the network I have developed.

What do you enjoy about your role?

Being able to get hands-on engineering experience, as well as flexibility to plan my own rotations, and learning from industry experts.

What excites you about the career opportunities available at Sims Limited?

I am excited to keep networking across the globe and continue to support social and environmental sustainability.



RAISING AWARENESS ABOUT THE JOBS OF TOMORROW

This year, Sims Limited participated in the production of a docuseries, “Jobs of Tomorrow” with the Institute of Scrap Recycling Industries (ISRI), our industry association in the United States. The series is available on [ISRI Studios](#) and is currently streaming on [Prime Video](#) and [Apple TV+](#).

The series features interviews from industry leaders, academics and college students sharing their perspectives on recycling careers, technology, innovation and challenges faced by the industry. In addition to educating viewers, the series also aims to inspire people to join the recycling industry.

Sims Limited’s Elise Gautier, chief risk and sustainability officer, and Vania Grandi, commercial vice president, West USA for Sims Metal, were featured throughout five episodes in the series. Topics highlighted included designing for circularity, technology, electronics recycling and the essential contribution of recycling to sustainable development.



Elise Gautier, Sims Limited CRSO, appears in the Jobs of Tomorrow Docuseries



Roy Ah-See speaks at Sims Metal Milperra, NSW to mark NAIDOC Week

INNOVATE RAP

Sims Limited’s purpose calls us to value and celebrate the deep sustainability knowledge and practices of Aboriginal and Torres Strait Islander Peoples. In May 2023, we formalised the next step in our Reconciliation journey, receiving accreditation for our [Innovate Reconciliation Action Plan \(RAP\)](#), which builds upon the lessons from our first RAP (2021-22 Reflect RAP). The Innovate RAP extends our commitments over the next two years.

During FY23, we continued to undertake cultural awareness training, with 80% of Sims Limited frontline leaders completing the program. The training has built awareness among leaders of Australia’s history with First Nations people and deepened understanding of how we, as individuals and as an organisation, can play a role to progress Reconciliation.

During FY23, we maintained Supply Nation membership and actively sought opportunities to include more Indigenous-owned businesses in our supply chain, with varied levels of success. Overall, our spend with First Nations businesses was consistent with FY22 performance at \$1.2 million. We recorded second-tier spend for key suppliers for the first time in FY23. (Second-tier spend refers to the value of spend by Sims Limited with Indigenous-owned suppliers through Tier 1 suppliers – for example, if Sims Limited selects Indigenous-owned products through a personal protective equipment catalogue.) Our second-tier spend was less than 1% of Tier 1 spend in FY23.

Within our Innovate RAP, we have committed to engaging with First Nations voices to provide opportunities for our people to learn about the Uluru Statement from the Heart. Sims Limited also signed the RAP Partner statement of support for the Voice to Parliament. During National Reconciliation Week 2023, we celebrated the launch of Innovate RAP with guest speaker Uncle Barry Winmar, a Nyoongar Elder. Uncle Barry Winmar provided insight on the Uluru Statement from the Heart and what it means in the context of the Voice to Parliament.

We took the opportunity during NAIDOC week to build on this awareness. We invited Roy Ah-See, a Wiradjuri man and member of the Uluru Dialogue leadership, to share his personal story and lead a Q&A session on the Voice of the Parliament. Feedback from our people has indicated such engagements have been impactful and thought-provoking.



Uncle Gavi Duncan performs a Welcome to Country ceremony at the opening of the new Sims Metal Gosford, NSW site on Darkinjung country

High-performance and engaged workforce

At Sims Limited, creating a working environment that enables people to perform at their best is essential to achieving our purpose. We want our people to reach their full potential.

Understanding and improving the employee experience

After the results of our FY21 engagement survey, we invited employees to participate in focus groups and provide context on the key areas for improvement highlighted by the survey. Following the focus groups, members of the ELT participated in nine engagement focus group sessions to encourage participation across all business entities, geographies and functions. This provided rich, qualitative data to better understand the opportunities to improve engagement across the organisation.

In FY23, we provided this data to five Employee Experience & Culture committees, formed to specifically address areas of opportunity identified from this process. These individual committees include Purpose and Direction, Career Growth and Training, Communication, Feedback and Recognition, and Work Environment. The committees have access to resources to implement solutions that will enhance the employee experience and nurture our organisational culture. Each committee consists of employees from across the business and regions and requires a two-year commitment from members. Each committee receives support from a


steering committee made up of ELT members and functional leaders.

During FY23, the committee chairs presented their recommendations to the steering committee, who then reviewed and agreed upon initiatives for the committees to act upon. The initiatives they will be working on will be deployed throughout FY24 and beyond.

Whilst we originally had planned to run the engagement survey in FY23, we deferred it to FY24 due to other important all-employee surveys conducted during the year, including the safety culture and DEI surveys. These surveys did give us confidence of the core engagement of the organisation, including the strong score of 80% of employees who would recommend Sims Limited as a good place to work.

Enabling high-performing teams

As part of our focus to build a high-performing culture that is reflective of our core values and the behaviours outlined in our pillars of purpose, all employees who participate in the performance review process complete a review of these shared principles and the relationship to their roles during mid- and end-year performance reviews. These reviews are conducted in our human capital management (HCM) system, enabling consistent alignment across the whole organisation. This year, 60% of employees participated in the performance review process in our HCM system.




THE PILLARS OF PURPOSE

We are shaping a sustainable future. If we are to realise our purpose, all of our actions, words and deeds must embody – and be guided by these pillars that our purpose, create a world without waste to preserve our planet, is built on. When we embrace our purpose narrative, we will ...


BAND TOGETHER

- Create an environment where employees feel that their efforts can make a difference
- Leverage each other's strengths
- Embrace different perspectives
- Prepare employees for the opportunities ahead
- Build trusted relationships inside and outside of the company



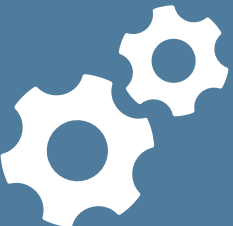
ACCEPT AND EXPECT ACCOUNTABILITY

- Do the right thing, don't just do things right
- Make values-based decisions and be empowered to make tough choices
- Think strategically and long-term
- Practice what you preach
- Share information to create excitement
- Provide clear expectations so employees know what is expected of them




CONSISTENTLY INNOVATE

- Stay ahead of the curve
- Exceed customer expectations
- Challenge traditions with an entrepreneurial spirit
- Encourage creative thinking and solutions – take the risks that are worth taking and view mistakes as opportunities for learning
- Think and work at the speed of digital




INSPIRE WITH PASSION

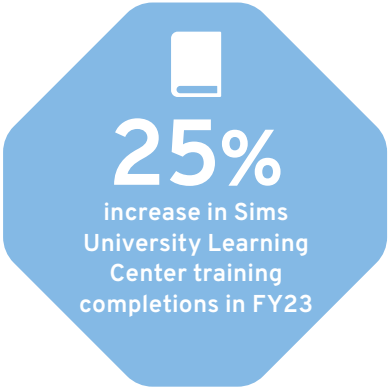
- Be brave, authentic and fair
- Lead by example and with consistency
- Care like a family, but act like a community
- Be visible; walk the "yard" to show support
- Demonstrate empathy and mutual respect



CELEBRATE AND HAVE FUN

- Smile and have a positive demeanor
- Recognise and celebrate each other's accomplishments
- Reward the little things
- Make each other laugh
- Value your colleagues
- Be true to yourself, and be your true self





Leadership development

We believe that safety management and people management are the core leadership responsibilities that ultimately drive our culture and performance at Sims Limited. All leaders, whether in a yard, a facility or in an administrative role, are responsible for providing a safe, positive and productive work environment. In FY23, we began the development of a leadership training curriculum intended to provide managers with the knowledge, skills, tools and behaviours to fulfill this commitment.

"Leader's Commitment @ Sims" is a comprehensive curriculum that consists of the following elements:

- **Commit to Care:** This safety leadership course (outlined on page 32) speaks directly to the culture of psychological safety and trust we want to build at Sims Limited.
- **Commit to Lead:** This course provides the foundational information needed to be an effective leader. It includes behaviours, skills and knowledge that managers require to drive performance and enhance the employee experience.

We will evaluate the success of these programs in multiple ways and at different points of the implementation. This will include course completion among our leadership, followed by measurement of specific objectives around behaviour change and business impact that were identified during course development.

Sims University Learning Center

Sims Limited employs approximately 4,000 people who operate from 250 facilities across 15 countries. With such a distributed workforce, connecting with employees can be difficult – especially when most employees do not sit behind a desk. In 2019, we launched Sims University Learning Center, our internal learning platform also known as "Sims U," which connects employees from all over the world with vital work-related information, assessments and training material.

Sims U has a catalogue of over 1,000 courses available across a wide variety of topics including operations, professional development, systems and technology, health, safety and wellness, and much more. Training completions increased over 25% in FY23 as Sims Limited employees completed over 89,000 courses this year. During the year, we implemented a process for employees to upload training completed externally or via facilitated sessions into Sims U so that employee learning histories accurately depict all the training they have completed in one central location. The platform is accessible via mobile devices and tablets, which facilitates access for those who do not have regular access to a computer. In FY23, training kiosks were installed in many Sims Limited facilities throughout North America to further increase access for employees working in our yards.

Investing in our communities

At Sims Limited, our purpose is to create a world without waste to preserve our planet. This purpose cannot be achieved alone – it requires positive relationships with our communities and respectful and reciprocal partnerships built on open communication, engagement and trust.

Growing positive relationships

For industrial businesses such as Sims Limited, building and maintaining social licence is driven largely at a local operational level, with global actions providing a foundation for trust and credibility. Sims Limited's business model requires its facilities to be located in or near large metropolitan areas, and most of our employees, including the local senior management, are hired from the local community. Our operations deliver benefits to the local community, including employment, waste reduction, income from Sims Metal's purchase of end-of-life metals, taxes and contribution to local supply chains. We also contribute through our community impact programs and support of local charities, environmental groups and schools. However, we recognise that potential negative impacts such as dust, noise and traffic are felt locally, particularly from metal recycling activities, and we are committed to manage and respond effectively.

This year, we designed, piloted and commenced rollout of our social licence framework. Our local leaders have always been empowered to engage with their communities and have built up meaningful

relationships over many years. Our new framework helps us to ensure a globally consistent approach, providing structure and prioritisation, and enabling visibility and support for risks and opportunities identified. It recognises the shifts in our external environment, ensuring we can both manage risk and take advantage of the opportunities to be a partner for change. The framework begins with a structured workshop to identify and prioritise stakeholders, including neighbouring residential, commercial and industrial developments; schools, protected areas and natural features; and amenities our operations could impact (e.g., roads). From there, risks, issues and opportunities are identified and prioritised, and action plans developed with regular monitoring and check-ins. In FY23, this framework was applied to a number of sites in Australia and the United States, with feedback from local operational teams incorporated to continue improving the approach. The framework will continue to be rolled out across our global operations in FY24.

Further details on our engagement with our stakeholders are set out on pages 14 and 15.



Sims Metal staff participate in Clean Up Australia Day activities in St Marys, NSW

UN SDGS IMPACTED THROUGH COMMUNITY ENGAGEMENT



Community impact

During FY23, we have furthered the implementation of our community impact framework, which will guide our efforts to meet our FY25 targets and beyond. We republished our community engagement policy, including the key areas we will focus on efforts and resources on partnering for change:

- Waste reduction and the circular economy
- Protection and regeneration of nature
- Positive outcomes for diverse and disadvantaged communities
- Positive outcomes for local communities that host a Sims Limited operation

These priorities align with our focus on SDG 8: Decent Work and Economic Growth, SDG 12: Responsible Consumption and Production, and SDG 13: Climate Action, as well as topics identified through our materiality process and our strengths as a business.

We also convened our Community Impact Council (CIC), a group of employee representatives to provide input, direction and participate in the assessment of community impact vehicles such as fundraising requests. The CIC is made up from employees belonging to different businesses in different locations at different stages of their careers and is comprised of 50% women and 30% people of colour.

The chart above shows the alignment of our Sims Limited's community engagements (may be an event, sponsorship or donation) to the SDGs. Of course, many community events may align with more than one SDG, but we have chosen the SDG with the clearest alignment. This year, activities aligned to SDGs related to the environment and the circular economy increased, as a result of our focus on our new key areas, as well as activities undertaken in association with Earth Day.

¹⁷ Includes donations of money and resources, value of time and community-benefitting sponsorships



SDG 2: Zero Hunger

ZERO HUNGER – BACK AT GRIP AFTER COVID

Sims Metal staff in Richmond, California, are excited to be back at the Greater Richmond Interfaith Program (GRIP) after pandemic restrictions have lifted, continuing a 12-year relationship. GRIP is a multi-cultural, multi-ethnic coalition of congregations from varied faiths, working together as a diverse and inclusive coalition to serve over 56,000 meals and 20,000 shelter nights to parents and children each year. Uniquely, GRIP's shelter is the only in the county that houses families together.

GRIP is in partnership with many programs and organisations in Richmond that specialise in early childhood education, employment services, health and other services, supporting residents as they move toward self-sufficiency.

Once a month, staff from Sims Metal supply and cook their "signature meal": chicken broccoli alfredo, salad, garlic bread and freshly baked chocolate chip cookies. Sims Metal Transport Specialist Barbara Minor said, "One night as we were cooking, a little girl came up to the counter and asked what we were cooking. When we told her, she started dreamily spinning around the room, saying, 'Yay, it's my favorite meal.' That's when we knew for sure that we needed to keep making it!"



Sims Metal supports the work of GRIP throughout the year, including through sponsorship of the annual Harmony Walk, which was back in person in 2022 for the first time since 2019, and raised more than US\$22,000 for GRIP. In FY23, Sims Metal also contributed US\$8,000 toward replacing dining furniture, upgrading plastic folding tables with family-style wooden ones and creating a more welcoming atmosphere for the families that temporarily call GRIP home.



SDG 4: Quality Education

CLIMATE EDUCATION AT OAK GROVE-BELLEMEADE ELEMENTARY SCHOOL

Addressing climate change requires collaboration with all groups in society – in the community, in the business world, and between adults and children. But it can be a tough subject to tackle with children, and there are a lot of big ideas to consider: scientific curiosity, natural wonder, awareness of problems and solutions, and understanding the "right thing" to do. In Richmond, Virginia, we're proud to be working with [Oak Grove-Bellemeade Elementary School \(OGBES\)](#) to help tackle these subjects. OGBES is a Title 1 school that serves approximately 675 students from Pre-K to 5 located nearby our Sims Metal premises.

Sims Metal has offered financial support for the 2022-2023 school year to source school and teacher supplies, software licences, and laboratory kits and equipment for an after-school program focused on the circular economy, sustainability and the recycling industry.

Using the school's grounds in Bellemeade Park, which include a waterway, as a practical learning environment, the kids examine macro and micro life all around them. This gets them thinking about human impacts on the environment – such as climate change, litter and pollution – and how humans can solve these problems. The program also includes hands-on demonstrations from the Sims Limited team. Here, Collin White, EHS specialist, explains the concept of CO₂ emissions from combustion using vinegar and baking soda, and uses watermills to demonstrate renewable electricity principles.



SDG 10: Reduced Inequalities

HELPING BRIDGE THE DIGITAL INCLUSION GAP

We live in a digital world, but not everyone has access to reliable information and communications technology (ICT) assets, which can limit opportunities to keep in contact with loved ones or pursue education and employment. Reusing and donating ICT assets is an important way that Sims Lifecycle Services clients can meet their social impact goals and work to close the "digital divide."

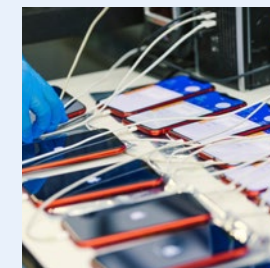
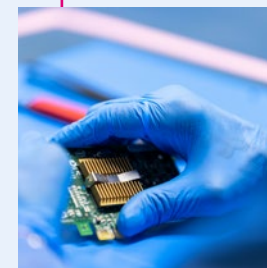
Research by the Good Things Foundation found that the three key barriers for reusing IT assets for social good are:

- Data security concerns
- Challenges in end-to-end processes, including finding a suitable external partner
- Lack of knowledge about the opportunity and positive impact on society and environment from reusing devices¹⁸

SLS helps our clients overcome these key barriers by providing services to fully support donations of their end-of-life technology devices. Leveraging our data-safe ITAD services, all devices are tested, refurbished and cleansed of data. Operating systems are then reinstalled to ensure the new users can start using the refurbished devices right away.

During FY23, SLS helped clients direct their end-of-life devices to those working to close the

digital divide. In the Netherlands, we facilitated the donation of 400 devices to students, refugees and jobseekers through Laptop Opvang (Laptop Shelter). Students in Poland also benefitted from the donation of 77 laptops in conjunction with Fundacja To się Uda (To Uda Foundation). In Australia, our Circular Centre processed 50 ex-Sims Limited smartphones that were donated to Ukrainian refugees. SLS is proud to use our skills and networks to help divert these assets to create positive social impact.

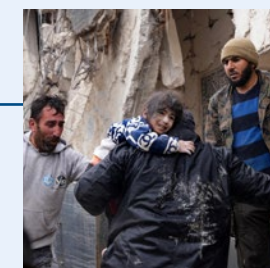
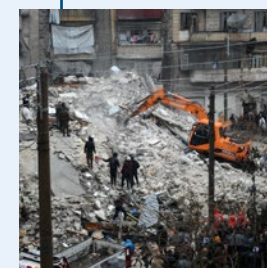


SDG 16: Peace, Justice and Strong Institutions

TÜRKIYE AND SYRIA EARTHQUAKE RELIEF

More than 18% of Sims Metal sales of processed scrap to external customers are in Türkiye, and the region hosts some of our long-term trading partners. A 7.8 magnitude earthquake devastated Türkiye and Syria on 6 February, 2023, costing nearly 60,000 lives and displacing hundreds of thousands of people.

As an expression of solidarity with our colleagues and trading partners, many of whom participated in the rescue effort, Sims Limited donated \$100,000 each to [AHBAP](#) and [UNICEF](#) to provide humanitarian aid to support the rescue and relief efforts. Both AHBAP and UNICEF are on the ground providing critical support, such as shelter, food, warm clothes and medical supplies to families and children in need.



18 <https://www.goodthingsfoundation.org/insights/report-circular-electronics-for-social-good/>

Focus on integrity

At Sims Limited, we understand that a sustainably strong business is responsibly governed, behaves ethically and respects human rights. At every level of the company, we work to create a culture that inspires trust among our employees, our customers and the communities we serve.

Human rights

Everywhere Sims Limited works we respect and support all internationally recognised human rights, in line with the [UN Universal Declaration of Human Rights](#) and the [UN Guiding Principles for Business and Human Rights](#). In FY22, we became a signatory to the [UN Global Compact](#), endorsing the 10 principles on human rights, labour, environment and anti-corruption.

Sims Limited endeavours to avoid being complicit in or encouraging activities that may cause or contribute to human rights abuses through proactive training, education and due diligence, which are comprehensively detailed in our [2022 Modern Slavery Statement](#). The 2023 update will be published on our website in December.

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. In FY23, we published our Human Rights Remediation Process Policy which we developed with the aid of modern slavery experts. 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. We also provided bespoke training for the members of this council and those who will lead our response to allegations of negative human rights impacts.

We continue to work hard to improve access to, and the effectiveness of, resources in Papua New Guinea, which is the only country that is considered high-risk for modern slavery within our direct operations. In FY23, we directly consulted with employees about how examples in the modern slavery training could be made more relevant and incorporated this feedback into this year's materials. In FY22, we worked with local leadership and experts to provide training materials, posters and an independent, anonymous reporting service so these were all available in Tok Pisin, the local dialect.

Promoting ethical conduct

At Sims Limited, our culture of ethical behaviour allows us to build trust with our stakeholders, create long-term sustainable value and partner to achieve our purpose. Our Board is committed to establishing sound corporate governance practices that ensure we uphold our core values of safety, integrity, respect, transparency, excellence and social responsibility. In 2023, Sims Limited made [Newsweek's list of America's Most Responsible Companies](#) for the third year in a row. The list highlights companies that are leaders in ESG practices.

During FY23, Sims Limited joined the Business Ethics Leadership Alliance (BELA), a global community of governance, ethics and compliance leaders collaborating to drive best practices. We completed the BELA benchmarking program and have integrated the opportunities for improvement into our program for FY24 and beyond.



We also participated in the first Business & Human Rights Accelerator of the UN Global Compact, hosted by Global Compact Network Australia. The accelerator helped us in our efforts to continuously expand and refine our understanding of human rights impacts and the role we may play in addressing them.

Our Anti-Bribery & Anti-Corruption Policy

communicates our expectations when conducting business on behalf of Sims Limited to our officers, employees, contractors, agents, consultants, suppliers and Board of Directors. The policy sets standards that either meet or exceed anti-bribery and anti-corruption requirements in each of the countries where we do business.

Throughout the year, we take steps to prevent anti-competitive practices, bribery and corruption and promote high standards of conduct outlined in our policy.

PARTNERING FOR SUSTAINABILITY EDUCATION IN SOUTH AUSTRALIA

Keep South Australia Beautiful started in 1966 as a litter reduction campaign. Fifty years later, [KESAB environmental solutions](#) are leaders in creating sustainable communities through education, action and participation. For more than a decade, Sims Metal and KESAB have partnered with the objective of promoting and supporting metal recycling. A key component of the cooperative program is to provide educational tools for the general public and schoolchildren.

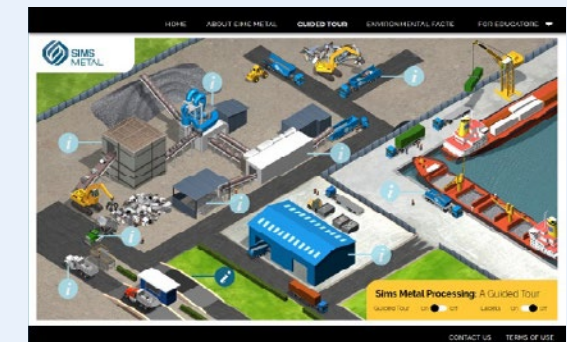
The [Sims Metal interactive microsite](#) was launched in mid-2017 and refreshed this year. Via a virtual guided tour, the site illustrates process of metal recycling, from the arrival of unsorted scrap at the gate to the loading of processed material to smelters, ready to be made into new metal products. It is complemented with educator worksheets to support student engagement. During FY23 there were just under 1000 unique visitors to the microsite and 130 downloads of the materials.

Sims Metal is also featured in the KESAB education centre, where visitors can have an interactive experience in this purpose built recycling facility. This is the only waste and recycling education centre in metropolitan Adelaide, and this year welcomed 2340 students, parents and teachers from 20 different metropolitan and regional areas through the doors.

We host regular 'Beyond the Kerb' site tours in conjunction with KESAB, allowing interested members of the community to safely visit resource recovery centres to learn more about what happens to their recycling. Our partnership supports KESAB's school, business and community programs that deliver education, bin assessments and action planning to grow the circular economy and reduce litter in South Australia.



KESAB environmental education centre



Microsite

We have:

- Provided training on our requirements, Code of Conduct, and key ethics and compliance policies as a routine part of onboarding new employees.
- Conducted annual training on our Code of Conduct and how to report concerns free from retaliation. The annual training includes areas of focus that rotate. In FY23, these covered the importance of preventing fraud, bribery, corruption and conflicts of interest.
- Conducted annual refreshers of anti-trust, anti-bribery and anti-corruption for commercial and global trade team members.
- Promoted our reporting and grievance mechanisms, including open-door reporting, our independent third-party hotline and the ability to make anonymous reports.

- Promoted "Compliance Month" for the third year. During the month of November, we promoted multiple compliance areas through videos, comics, articles and puzzles across all our internal communication channels, with new materials posted each week.
- Promoted our hotline to temporary workers and visitors through posters and materials at our sites.

Sims Limited's internal audit services provide independent, objective assurance and consulting services to improve the company's operations across financial, operational, information technology, external reporting and compliance to provide assurance that our policies and processes operate effectively. In FY23, our internal audit group conducted 23 internal audits with a focus on key internal controls at Sims Limited sites.

Privacy and security

Sims Limited takes great pride in having robust privacy and security policies and strives to be best-in-class, protecting any information and data in our custody and stewardship. It is critical to the effective operation of our business, as we serve blue chip clients across a range of industries, to securely and responsibly manage the disposition of IT equipment and electronic products. Our organisation has a vice president of IT Risk and Information Security specifically designated to ensure Sims Limited's information security practices are aligned with acceptable risk and industry best practices. There were no reportable security breaches during the reporting period.

During the reporting period, we have:

- Maintained technologies to improve our overall cybersecurity landscape, including but not limited to global virtual private networks (VPNs), multi-factor authentication (MFA), robust anti-virus/anti-spyware/anti-malware software technologies, data protection via encryption and machine authentication.
- Completed a benchmark of our organisation against the National Institute of Standards and Technology (NIST) cybersecurity framework.
- Enhanced our information security/cybersecurity awareness training program by leveraging various internal communication channels, including email (frequent publication of cybersecurity articles) and MySims Intranet site (security videos and Cybersecurity Awareness newsletter).
- Continued to include training on relevant security awareness policies (e.g., acceptable use, protection of information assets) as part of our new employee onboarding process.
- Deployed our mandatory Annual Cybersecurity Training video, which is managed through the Sims University Learning Center.
- Conducted bi-monthly internal simulated phishing testing attacks and enhanced our KPI reporting.

- Maintained appropriate cyber insurance.
- Implemented a robust incident response strategy in partnership with third-party service providers of managed detection and incident response and conducted our annual global incident response tabletop exercise.
- Subjected our cybersecurity practices to annual internal and external audit, and vulnerability assessment and penetration testing multiple times during the year.

Fair remuneration

Our Annual Report discloses the philosophy, guiding principles and performance alignment related to executive remuneration. Executive remuneration is overseen by the Remuneration Committee of the Board and shareholders are also provided with an annual vote on their report. More details on executive remuneration can be found in the Annual Report.

Sims Limited's roles have been graded using the well-established and validated Korn Ferry/Hay Grading methodology. This provides a consistent foundation for identifying roles of similar value throughout the company. With this foundation, we can apply a consistent approach to participation in incentives and other variable benefits, as well as effective pay analysis, including pay equity analysis. In addition to the globally consistent grading structure, we participate in and purchase independent salary surveys to validate we are paying market competitive base and variable pay based on the duties, skill requirements and location of employment.

Nearly all our employees, including the local senior management, are hired from the local communities. In all of Sims Limited's operating jurisdictions, entry-level wage rates are above the minimum wage requirements. The proportion of employees covered by a collective bargaining agreement can be found in the Sustainability Databook.

Completed
benchmark against
NIST cybersecurity
framework



99.88%

Percentage of Sims Limited's
FY23 revenue defined as
sustainable, according to
Corporate Knights

Economic contribution

FY23 sales revenue of \$8,061.1 million was down 13.0% compared to FY22 sales revenue of \$9,264.4 million. At constant currency, the sales revenue decreased by 16.5% for the same period. The decrease was attributed to decreases in market prices and lower sales volumes, driven by challenging trading conditions across all markets.

Sales volumes were 9.432 million tonnes in FY23 versus 9.707 million tonnes in FY22. Tightening metal markets during FY23 resulted in reduced buy prices paid by scrap processors. This resulted in reduced scrap material being brought to market. We closed the year with an underlying EBIT of \$252.2 million.

The contribution of our new businesses (Sims Lifecycle Services, Sims Resource Renewal and Sims Energy) to overall EBIT this year was 1.35% against our target of 10% by 2025. The decline from FY22 performance was influenced by a decline in underlying SLS EBIT, driven by margin compression and inflationary pressures. SRR had increased costs this year associated with the operation of the Rocklea pilot plant and further strategy development.

Tax matters


During FY23, we published our first voluntary [Tax Contribution Report](#) (FY22) to provide information to help the community, investors and other stakeholders better understand Sims Limited's tax strategy, governance, and compliance with the tax laws in Australia and internationally, and help increase community confidence that Sims Limited pays its appropriate share of taxes. These disclosures also demonstrate our strong commitment to transparency. The FY23 report will be published in December.

The company strives to pay the right amount of tax, at the right time, in the jurisdictions where it creates value. This is consistent with the company's purpose and belief in sustainability, being socially responsible, and to operate the business with full integrity. Stakeholders are invited to refer to the tax contribution report for more details, including a country-by-country breakdown of tax and our approach to risk management and governance arrangements.

External and internal auditors periodically test and review to validate that internal controls are properly working and that documentation is maintained, evaluated, monitored and communicated to the executive leadership team, auditors and the Audit Committee of the Board.



External recognition

	14th most sustainable company globally and member of the Clean200 global list
	Maximum AAA rating
	Financial Times Asia-Pacific Climate Leaders 2023
	A- in 2022 Climate submission
	Awarded to companies with ESG performance above the sector-specific Prime threshold
	Sustainalytics – Low ESG risk
	Newsweek America's Most Responsible Companies 2023
	Debuted on FTSE4Good index
	Top decile performance in the steel sector in 2022 index ¹⁹
	TAHITO Te Tai o Rehua Fund – TransTasman Equity Fund 2023

CONTACT

Thank you for your interest in our report. We welcome your questions, comments and feedback. You may contact us at:

Elise Gautier, Chief Risk and Sustainability Officer
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Ana Metelo, Director, Investor Relations
ana.metelo@simsmm.com



19 As at 13 December 2022



INDEPENDENT LIMITED ASSURANCE STATEMENT

To: The Stakeholders of Sims Limited

Apex Companies LLC, (Apex) was engaged to provide limited assurance of the greenhouse gas (GHG) emissions and select ESG data reported by Sims Limited (Sims) for the period stated below. This limited assurance statement applies to the related information included within the scope of work described below.

The determination of the GHG emissions and select ESG data is the sole responsibility of Sims. Sims is responsible for the preparation and fair presentation of the GHG emissions statement and select ESG data in accordance with the criteria. Apex's sole responsibility was to provide an independent assurance opinion on the accuracy of the GHG emissions and select ESG data reported and on the underlying systems and processes used to collect, analyze and review the information. Apex is responsible for expressing an opinion on the GHG emissions statement and select ESG data based upon the assurance. Assurance activities applied in a limited level of assurance are less extensive in nature, timing and extent than in a reasonable level of assurance.

Boundaries of the reporting company GHG emissions and select ESG data covered by the assurance:

- Operational Control
- Worldwide
- Exclusions from the scope of Sims' GHG emissions assertion are:
 - Refrigerants, which have been determined to be immaterial

Types of GHGs: CO₂, N₂O, and CH₄

GHG Emissions and ESG Statement:

- Scope 1:** 78,071 metric tons of CO₂ equivalent
- Scope 2: Location-Based:** 66,600 metric tons of CO₂ equivalent
- Scope 2: Market-Based:** 23,140 metric tons of CO₂ equivalent
- Scope 3:**
 - Category 1 - Purchased Goods & Services: 100,563 metric tons of CO₂ equivalent
 - Category 2 - Capital Goods: 34,016 metric tons of CO₂ equivalent
 - Category 3 - Fuel- and Energy-Related Activities: 38,284 metric tons of CO₂ equivalent
 - Category 4 - Upstream Transportation and Distribution: 556,889 metric tons of CO₂ equivalent
 - Category 6 - Business Travel: 4,830 metric tons of CO₂ equivalent
 - Category 10 - Processing of Sold Products: 3,354,625 metric tons of CO₂ equivalent
 - Category 11 - Use of Sold Products: 48,762 metric tons of CO₂ equivalent
 - Category 15 - Investments: 61,417 metric tons of CO₂ equivalent
- Total Water Consumption:** 565,173,615 liters
- Total Waste Volume (automotive shredder residue only):** 1,137,840 metric tons
- Total NO_x and SO₂ Air Emissions (from combustion sources):** 1,268 metric tons
- Total Energy Consumed:** 1,816,563 gigajoules



- Gender Pay Gap:** 2.9%
- Health and Safety Data**
 - Critical Risk Incident Rate:** 0.74
 - Total hours worked:** 10,591 thousand hours
 - Total recordable injuries:** 57
 - Fatality count:** 0
 - High-consequence injury count:** 3
 - High-consequence injury rates (per 200,000 hours and per 1,000,000 hours)**
 - Per 200,000 hours:** 0.06
 - Per 1,000,000 hours:** 0.28
 - Recordable work-related injury rates (per 200,000 hours and per 1,000,000 hours)**
 - Per 200,000 hours:** 1.08
 - Per 1,000,000 hours:** 5.38
 - Number of lost time injuries:** 10
 - Lost time injury frequency rates (per 200,000 hours and per 1,000,000 hours)**
 - Per 200,000 hours:** 0.19
 - Per 1,000,000 hours:** 0.94
- Scope 1 and Scope 2 targets' alignment with Science Based Target initiative (SBTi) Criteria and Recommendations for Near Term Targets**
 - Sims' emissions reductions targets for Scope 1 and Scope 2 emissions, modeled using the Science-based Target Setting Tool Version 1.2, appear to be in alignment with efforts to limit global warming to 1.5°C as prescribed by SBTi.

Data and information supporting the Scope 1, Scope 2 and Scope 3 GHG emissions assertion were in some cases estimated rather than historical in nature. Data and information supporting the ESG assertions were generally historical in nature.

Period covered by assurance:

- Fiscal Year 2023 – July 1, 2022 to June 30, 2023

Reporting Protocols against which assurance was conducted:

- World Resources Institute (WRI)/World Business Council for Sustainable Development (WBCSD) Greenhouse Gas Protocol, Corporate Accounting and Reporting Standard, Revised Edition (Scope 1 and 2) and the GHG Protocol Scope 2 Guidance, an amendment to the GHG Protocol Corporate Standard
- WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Scope 3)
- OSHA and US Bureau of Labor Standards (Safety Data)
- Company criteria (ESG data)



- Science Based Target initiative (SBTI) Criteria and Recommendations for Near Term Targets (Version 5.1, April 2023)

Verification/Assurance Protocols used to conduct the assurance:

- ISO 14064-3 Second Edition 2019-04: Greenhouse gases -- Part 3: Specification with guidance for the verification and validation of greenhouse gas statements
- International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements Other than Audits or Reviews of Historical Financial Information (effective for assurance reports dated on or after Dec. 15, 2015), issued by the International Auditing and Assurance Standards Board

Level of Assurance and Qualifications:

- Limited
- This assurance used a materiality threshold of $\pm 5\%$ for aggregate errors in sampled data for each of the above indicators.

GHG Verification Methodology:

Evidence-gathering procedures included, but were not limited to:

- Interviews with relevant personnel of Sims;
- Review of documentary evidence produced by Sims;
- Review of Sims' data and information systems and methodology for collection, aggregation, analysis and review of information used to determine GHG emissions; and,
- Audit of sample data used by Sims to determine GHG emissions.

ESG Data Assurance Methodology:

Evidence-gathering procedures included, but were not limited to:

- Assessing the appropriateness of the Reporting Criteria;
- Conducting interviews with relevant Sims personnel regarding data collection and reporting systems;
- Reviewing the data collection and consolidation processes, including assessing assumptions made, and the data scope and reporting boundaries;
- Reviewing documentary evidence provided by Sims;
- Agreeing a selection of the data to the corresponding source documentation;
- Reviewing Sims systems for quantitative data aggregation and analysis; and
- Assessing the disclosure and presentation of the subject matter to ensure consistency with assured information.

Assurance Opinion:

Based on the assurance process and procedures conducted to a limited assurance level of the GHG emissions and ESG data statement shown above, Apex found no evidence that the GHG emissions statement and ESG data statement:

- is not materially correct and is not a fair representation of the GHG emissions and ESG data and information; and



- has not been prepared in accordance with the WRI/WBCSD GHG Protocol Corporate Accounting and Reporting Standard (Scope 1 and 2), and WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain Accounting and Reporting Standard (Scope 3).

It is our opinion that Sims has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of the GHG emissions and ESG data for the stated period and boundaries.

Statement of Independence, Integrity and Competence

Apex is an independent professional services company that specializes in Health, Safety, Social and Environmental management services including assurance with over 30 years history in providing these services.

No member of the verification team has a business relationship with Sims Limited, its Directors or Managers beyond that required of this assignment. We conducted this verification independently and to our knowledge there has been no conflict of interest.

Apex has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.

The verification team has extensive experience in conducting assurance over environmental, social, ethical and health and safety information, systems and processes, has over 20 years combined experience in this field and an excellent understanding of Apex's standard methodology for the verification of greenhouse gas emissions data.

Attestation:

Jessica Jacobs, Lead Verifier
ESG – Senior Project Manager
Apex Companies, LLC
Cincinnati, Ohio

Trevor Donaghu, Technical Reviewer
ESG Director
Apex Companies, LLC
Pleasant Hill, California

September 27, 2023

This independent assurance statement, including the opinion expressed herein, is provided to Sims Limited and is solely for the benefit of Sims Limited in accordance with the terms of our agreement. We consent to the release of this statement by you to the public or other organizations but without accepting or assuming any responsibility or liability on our part to any other party who may have access to this declaration.

