


# Strategic Focus

Leveraging Decarbonisation  
and Circularity



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A full-page background image showing a sunset over a beach. The sky is a mix of purple, pink, and orange. The ocean has gentle waves, and the beach is visible in the foreground. In the distance, there are dark silhouettes of mountains or hills.

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 re-use of finite natural resources and foster the decarbonisation of our suppliers' supply chains, which creates measurable, positive impact for individuals, communities, industries and governments.



### Acknowledgement of Country

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 2024. 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 FY24 Sustainability Report, Climate Report, Sustainability Databook and 2023 Modern Slavery Statement, will be available at [www.simsltd.com/sustainability](http://www.simsltd.com/sustainability)

All reporting for the period from 1 July 2023 through 30 June 2024 was done according to the Global Reporting Initiative (GRI) Standards, 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](http://www.simsltd.com/investors). All currency amounts are in Australian dollars.



Sustainability Report FY24



Climate Report FY24



Sustainability Databook FY24



Modern Slavery Statement FY24

# Chair and CEO Statement

We are pleased to present our first annual letter as Chairperson and CEO of Sims Limited. We are proud to lead a business with such a powerful and inspiring purpose: to create a world without waste to preserve our planet. This purpose continues to inspire us, our people, and our partners. Working for Sims is a privilege, as the work we do directly contributes to the circular economy and the decarbonisation of the metal industry, placing us at the heart of two crucial global movements.

Sims Limited's sustainability achievements were globally recognised in FY24 with the company being named the most sustainable corporation in the world by Corporate Knights' 2024 Global 100 Index. This accolade reinforces our position as a leader in sustainable practices.

This year has not been without its challenges. Despite facing challenging market conditions and economic pressures that required delaying some capital investments, we remained focused on sustainability, prioritising environmental projects. Safety is fundamental to our operations, and our dedication to a culture of safety and care keeps it at the heart of everything we do. We are proud to report that FY24 was another exceptional year for safety at Sims Limited, achieving a record TRIFR of 0.99 and reinforcing our commitment to the highest safety standards.

**This year has been one of transformation for Sims Limited, as we continue to focus on simplifying our business structure and refining our strategic focus.**

As a predominantly metal recycling company, we have a unique position in the industry. The greenhouse gases avoided by using recycled metals in the production of materials like steel, aluminium, and copper rather than producing these metals from virgin raw materials far exceed the emissions generated by our own operations. Our business not only drives financial outcomes for our shareholders but also generates value for our customers, the environment, and society as we continue to fight against climate change.

Over the past year, Sims Limited has undergone significant transformation, concentrating on simplifying our business structure and refining our strategic focus. Our simplification strategy has resulted in a more agile organisation, with a clearer emphasis on the metals businesses in Australia and the USA. As part of this process, we made the decision to divest our UK Metal business, while welcoming the Baltimore Scrap team and its 17 sites into our North American operations. These moves have positioned us for greater focus and impact, but we also recognise that they have temporarily affected some of our key metrics, including the representation of women within the business. We remain deeply committed to improving gender diversity across the organisation and will continue to work towards increasing women's representation within our workforce.



Philip  
Bainbridge



Stephen  
Mikkelsen



Additionally, we have also taken significant steps to simplify our sustainability framework. When we first embarked on our sustainability journey, we set ambitious goals and we have now reached a significant level of progress and maturity. We are proud that many of these targets have been met, and in some cases, exceeded, becoming part of our day-to-day operations. As our strategy and portfolio evolved, refreshing the framework became necessary, but we have maintained robust transparency, continuing to disclose key performance indicators to ensure accountability and the ability to track our progress.

Next year will be another busy period for us, as we prepare to take our Climate Report to a vote at the Annual General Meeting, an important milestone for the company and our shareholders. We are working to incorporate newly acquired data from our Baltimore operations into our greenhouse gas emissions reporting, and we plan to recalculate our baseline to reflect the impact of recent acquisitions and divestments. We will refresh our materiality assessment, ensuring our sustainability priorities remain aligned with evolving stakeholder expectations. Additionally, we will conduct an employee engagement survey to explore opportunities for improving workplace outcomes.

As we look forward, we are optimistic. Our purpose, to create a world without waste to preserve our planet, drives everything we do. We are excited to continue this journey alongside our talented team, our customers, and our partners. Together, we are building a more sustainable future for generations to come.

When we first embarked on our sustainability journey, we set ambitious goals and we have now reached a significant level of progress and maturity.

**Philip Bainbridge**  
Chairperson

**Stephen Mikkelsen**  
Group CEO and  
Managing Director

# Sustainability Highlights



**83%**

renewable  
electricity  
consumption



**Best ever**

year in  
safety  
performance  
on record

Lowered  
emissions

**31%**

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



Asia-Pacific  
**Climate  
Leader**

2024

**#1**

Named World's Most  
Sustainable Corporation







**21%**

of executive and  
senior leaders are  
women

Sims Limited has been included  
in the following indices

**Dow Jones  
Sustainability Indices**

Powered by the S&P Global CSA



FTSE4Good

**UN**

Global  
Compact  
signatory

**WE SUPPORT**





# How We Create Value

## WHAT WE RELY ON

## WHAT WE DO



### Natural capital

Metal scrap, e-waste and curbside recycling



### Manufacturing

\$1.4b property, plant and equipment



### Human capital

+4,800 employees  
+300 facilities around the world



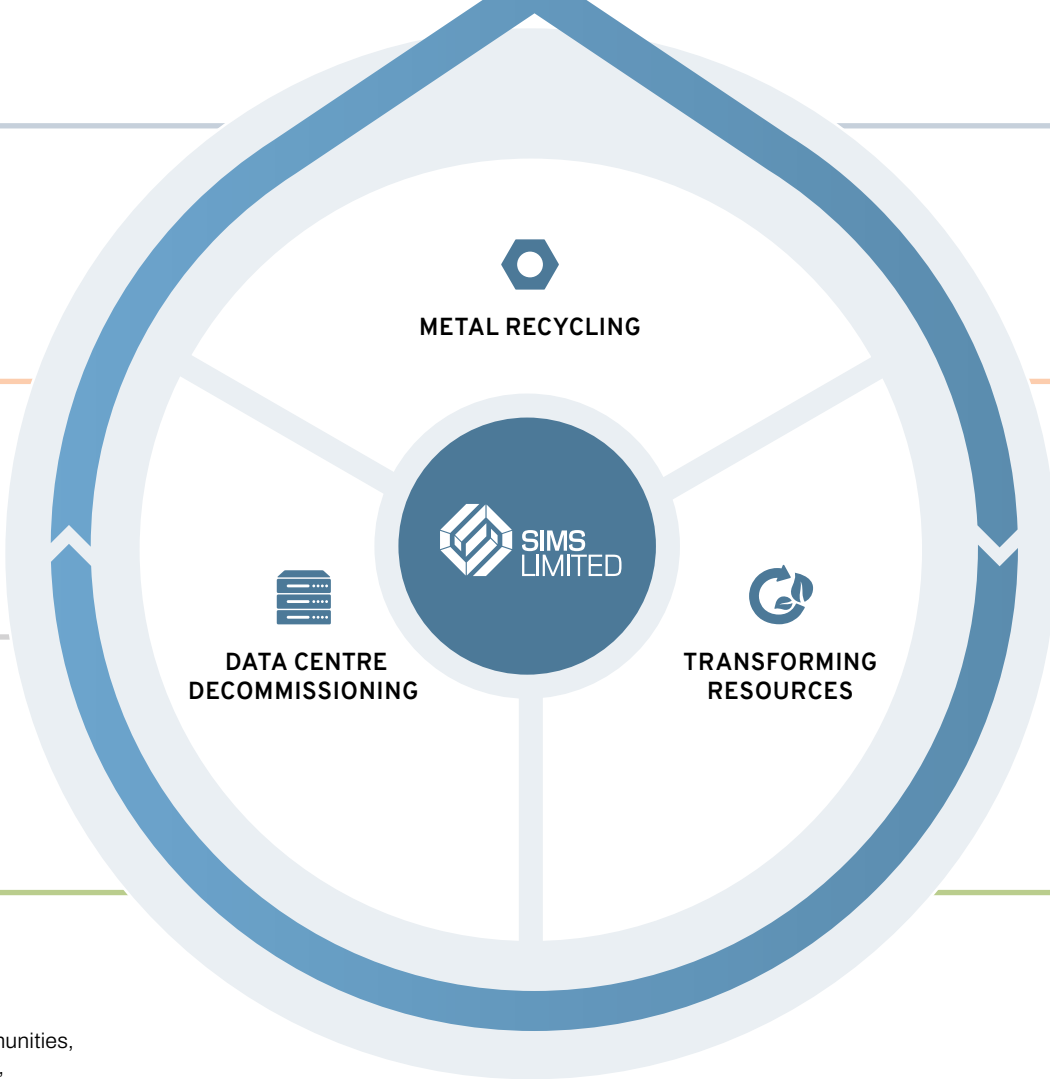
### Financial capital

Attracting long-term investment



### Social capital

Strategic relationships with communities, customers, industry associations, government, suppliers and others



1 Underlying earnings excludes significant non-recurring items, the impact of non-qualifying hedges and internal recharges



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.

## THE VALUE WE CREATE

**110+**

Sites using 100% renewable electricity

**7.782m**

Tonnes of proprietary intake volumes

**\$40.6m**

Distributed in cash dividends

**21%**

Women in senior management

**0.99**

Total recordable injury rate

**\$8,562.7m**

Sales revenue

**\$42.9m**

Underlying<sup>1</sup> EBIT

**\$43.1m**

Tax payments to governments

**>95%**

Employees completed anti-bribery and anti-corruption training

## IMPACT OF VALUE

### Economic

### Environmental

### Social

#### We make positive contributions by:

Delivering strong returns to investors

Investing in innovation for the circular economy

Supporting our customers' low-carbon growth and differentiation through environmental performance

Enabling substantial avoided emissions in the value chain

Conserving natural resources and biodiversity through circularity

Meeting and striving to exceed environmental standards; promoting better industry standards

Operating with the highest safety standards

Building a diverse, skilled, engaged workforce

Building partnerships and making contributions in communities

Paying taxes and competitive salaries

#### Potential negative impacts:

Generate CO<sub>2</sub>e emissions in our own operations

Generate Automotive Shredder Residue (ASR) waste that is currently diverted to landfill

Consumption of resources

Risk of safety and environmental impacts from operations

Risk of violation of labour and human rights standards in operations or supply chain

Local impacts such as dust, noise and traffic

#### We maximise positive contributions and minimise negative impacts through:

Disciplined management of costs and capital

Climate action plan and strong targets

Resource efficiency programs

Increased use of renewable electricity

Focused program of EHS risk assessment and controls

Compliance and ethics program

Supply chain due diligence program



Investing in training and development

Engagement with local communities

Investment of environmental capital to reduce impacts of operations

# Our Sustainability Strategy

Our purpose drives our sustainability strategy and business practices. Our strategy sets ambitious goals to reduce our environmental footprint, advance a circular economy, and positively impact our communities, while also targeting growth.

| Our Purpose   |  |   | Create a World Without War  |  |
|---|--|---|---|--|
| <b>Operate Responsibly</b><br> | <ul style="list-style-type: none"><li>■ Safety culture</li><li>■ Diversity, Equity &amp; Inclusion</li><li>■ Skilled and engaged workforce</li><li>■ Stringent ethical and transparent standards</li><li>■ Advocacy to raise operating standards in the metal industry</li></ul> |   | <b>Action on Climate</b><br> |  |
|   | Provide a safe workplace   | Total recordable injury frequency rate (TRIFR)<br>In FY24, the injury rate was 0.99 per 200,000 work hours – vs 1.08 in FY23.   |   |  |
|   | Safety leading indicators  | In FY24, the number of improvement actions increased by 12% from 15,375 to 17,225. System-based corrective actions see that risks are addressed.  |   |  |
|   | Improve diversity across business  | Employee gender pay equity<br>3.3% in FY24 compared to 2.9% in FY23.<br><br>% Women executives and senior leaders<br>21% in FY24 compared to 26% in FY23.<br><br>Women's representation on the board<br>38% in FY24 and FY23. |   |  |
|   |  |   | Reduce our impact on the environment  | Sims Scope 1 and 2 emissions<br><br>Sims Lifecycle Services Scope 1 and 2 – Carbon Neutral by 2025<br><br>100% renewable electricity by 2025<br><br>Reduce waste to landfill |



By focusing on responsible growth, we aim to enhance value for all stakeholders and achieve our measurable goals across our three strategic pillars.

## Waste to Preserve our Planet

- Reduce our impact on the environment
- Reduce waste to landfill
- Innovation to accelerate customers' decarbonisation and promote circular economies

Scope 1 and 2 Emissions decreased by 2.2 kilotonnes (2%) compared with FY23.

SLS emissions decreased 8% compared with FY23.

83% in FY24 – flat year on year.

Landfill waste generated per region decreased to 0.14kt.

## Communities



- Build trusted relationships within our communities through engagement and contributions

Increase community development initiatives and engagement

Community Investment

\$1.1m in FY24 vs \$0.7m in FY23.

Complaints

New metric introduced. To be reported for the first time in FY25.

Volunteer Hours

794 hours of recorded volunteer work in FY24 compared to 725 hours in FY23.

Social Procurement

The total supply nations business funds were \$2.72m in FY24 compared to \$1.22m in FY23.

Materiality

Regular materiality assessments are integral to our annual sustainability reporting, social licence, and risk management reviews. These assessments help us pinpoint key topics for our strategy and reporting, monitor risks, identify opportunities, and engage stakeholders.

In FY22, we conducted a formal materiality assessment involving research, stakeholder engagement, and data analysis, led by third-party consultants. We tested and ranked various sustainability topics based on their

significance to Sims Limited and stakeholders. Internal and external stakeholders were interviewed, and employees participated via a survey.

The assessment revealed new and emerging sustainability issues for Sims Limited. However, the importance of core topics like health and safety, climate action, environmental stewardship, social licence, and innovation remained consistent across different geographies and business areas.

| 1 Desktop review  | 2 Stakeholders  | 3 Materiality workshop and documentation   |
|---|---|--|
| <p>Assessment of Sims Limited's scores and comments against a selection of industry peers for key environmental, social and governance (ESG) reporting frameworks.</p> <p>Review and analysis of:</p> <ul style="list-style-type: none"><li>■ Legislation</li><li>■ Industry trends</li><li>■ Mega trends</li><li>■ Prior materiality results</li><li>■ Sims Limited's business strategy risk register</li></ul> <p>Key topics were identified and ranking criteria developed to measure importance of topics to stakeholders and impact on Sims Limited.</p> | <p>Topics and criteria were tested with a range of external and internal stakeholders to understand their perceived importance through:</p> <ul style="list-style-type: none"><li>■ Interviews with internal stakeholders, including executive leadership team (ELT) members and subject matter experts</li><li>■ Interviews with external stakeholders, including customers, investors, academia, sustainability experts and industry associations</li><li>■ Employee survey</li></ul> | <p>The outcomes of the process were reviewed and validated through workshops with the ELT and the Board, in which:</p> <ul style="list-style-type: none"><li>■ The materiality matrix was refined</li><li>■ Focus areas for Sims Limited were validated</li><li>■ Level of ambition was assessed</li></ul> |

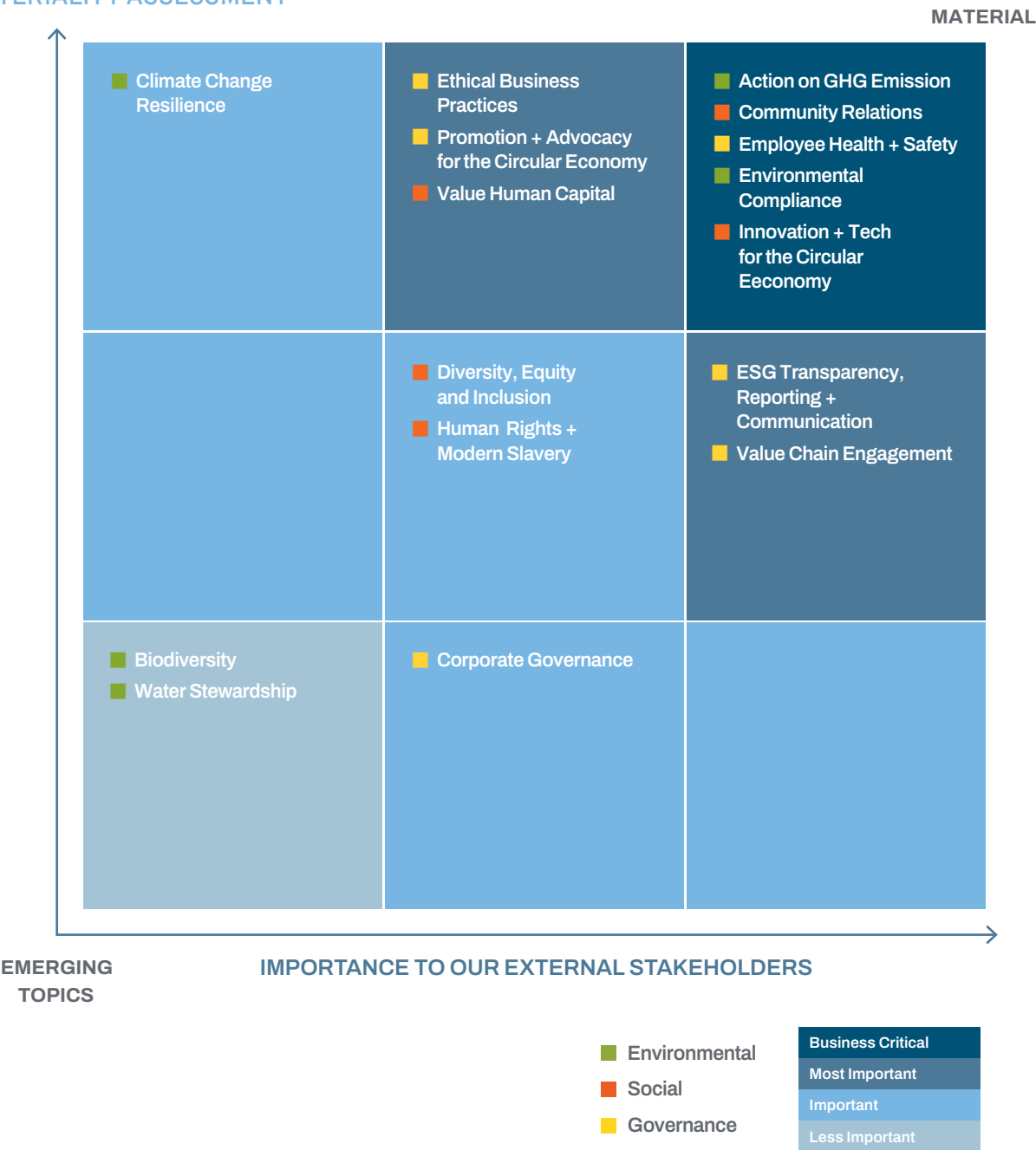


Our materiality matrix is presented in a grid format, grouping related topics for clarity. The top-right box displays topics that align with both Sims Limited's and our stakeholders' priorities. Detailed information on the materiality process and topic definitions is available in the Sustainability Databook. This report is aligned with 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.

As part of our commitment to improving our sustainability disclosures and regularly updating our materiality assessment, we will refresh our materiality during FY25. This will involve using our existing assessment process and engaging with stakeholders to reassess the prioritisation of topics and identify emerging risks and opportunities. We will seek feedback from our stakeholder and assess the external environment.

### MATERIALITY ASSESSMENT



## Stakeholder Management

Stakeholder engagement creates a feedback loop that enhances our corporation's business practices, builds relationships, and generates value. We identify stakeholders as those who significantly impact or are impacted by our operations. Engaging with them allows us to gather valuable insights, refine our sustainability strategies, and drive meaningful change within our corporation.

|                          | Employees  | Investors and Shareholders  | Suppliers  |
|--------------------------|--|---|--|
| HOW WE ENGAGE            | <ul style="list-style-type: none"> <li>■ Surveys (DEI, safety culture)</li> <li>■ Town hall/all-hands meetings (in-person and virtual) and site visits by ELT</li> <li>■ Internal events (e.g., International Women's Day)</li> <li>■ Global intranet and app, newsletters, emails, posters, regular team meetings, etc.</li> <li>■ Annual performance and development review</li> <li>■ Labour relations dialogues</li> <li>■ Safety alerts</li> <li>■ Toolbox talks</li> </ul> | <ul style="list-style-type: none"> <li>■ Annual General Meeting (AGM)</li> <li>■ Reporting suite</li> <li>■ Investor Day</li> <li>■ Media and website</li> <li>■ Email, calls, briefings</li> <li>■ Conferences</li> <li>■ Responding to ratings indexes and analyst questionnaires (e.g., MSCI, Sustainalytics)</li> </ul>   | <ul style="list-style-type: none"> <li>■ Meetings, emails, calls</li> <li>■ Supplier Code of Conduct</li> <li>■ Contracts and purchase conditions</li> </ul>   |
| MATERIAL TOPICS          | <ul style="list-style-type: none"> <li>■ Employee health and safety</li> <li>■ Diversity, equity and inclusion</li> <li>■ Environmental compliance</li> <li>■ Action on greenhouse gas (GHG) emissions</li> <li>■ Value human capital</li> </ul>   | <ul style="list-style-type: none"> <li>■ Action on GHG emissions</li> <li>■ Health and safety</li> <li>■ Innovation and technology for a circular economy</li> <li>■ Diversity, equity and inclusion</li> <li>■ Community relations</li> <li>■ Environmental compliance</li> <li>■ Corporate governance</li> <li>■ ESG reporting, transparency and communication</li> </ul> | <ul style="list-style-type: none"> <li>■ Value chain engagement</li> <li>■ Action on GHG emissions</li> <li>■ Innovation and technology for a circular economy</li> <li>■ Human rights and modern slavery</li> </ul>   |
| HOW WE RESPONDED IN FY24 | <ul style="list-style-type: none"> <li>■ Health and safety record performance (p 26)</li> <li>■ Sims University Learning Center – 105,000+ completed trainings in FY24 (p 35)</li> <li>■ Targeted talent programs (e.g., early career, Women Leading @ Sims – p 30)</li> <li>■ Employee Experience &amp; Culture Committee (p 32)</li> <li>■ Employee assistance program for well-being and mental health support</li> </ul>   | <ul style="list-style-type: none"> <li>■ Continued to invest in environmental capital and towards the decarbonisation of our operations</li> <li>■ We obtained external assurance over sustainability reports</li> <li>■ ESG Investor Tour held at Milperra, NSW in November 2023</li> </ul>  | <ul style="list-style-type: none"> <li>■ Global procurement program</li> <li>■ Training on Code of Conduct and Modern Slavery for agents (p 38)</li> <li>■ Member of Supply Nation, the leading body for verified Indigenous-owned business in Australia (p 31)</li> </ul> |
| OUR CHALLENGES           | <ul style="list-style-type: none"> <li>■ Engagement on sustainability goals and strategies</li> <li>■ Increasing percentage of employees who receive a performance appraisal</li> </ul>  | <ul style="list-style-type: none"> <li>■ Continued shortage of scrap supply</li> <li>■ Chinese export of steel</li> <li>■ Global uncertainty because of geopolitical risks and macro-economic factors</li> </ul>  | <ul style="list-style-type: none"> <li>■ Effectively measure and manage Scope 3 emissions in the supply chain</li> <li>■ Manage human rights and sustainability risks through due diligence</li> </ul>   |



| Customers   | Communities   | Government and Regulators   |
|---|---|---|
| <ul style="list-style-type: none"> <li>■ Meetings, emails, calls</li> <li>■ Site visits and training sessions</li> <li>■ Media and website</li> <li>■ Reporting suite</li> <li>■ Responding to ratings indexes (e.g., CDP)</li> <li>■ Responding to customer due diligence surveys</li> </ul> | <ul style="list-style-type: none"> <li>■ Meetings, emails, calls</li> <li>■ Media and website</li> <li>■ Local events and sponsorships</li> <li>■ Community clean-up events</li> <li>■ Virtual engagement rooms</li> <li>■ Site visits</li> </ul>   | <ul style="list-style-type: none"> <li>■ Participation in local and global associations (e.g., Recycled Materials Association and Open Compute Project)</li> <li>■ Constructive dialogue with regulators and governments on the circular economy, manufacturing and decarbonisation</li> <li>■ Permits and development process</li> <li>■ Meetings, calls, letters</li> </ul> |
| <ul style="list-style-type: none"> <li>■ Value chain engagement</li> <li>■ Action on GHG emissions</li> <li>■ Health and safety</li> <li>■ Innovation and technology for a circular economy</li> </ul>  | <ul style="list-style-type: none"> <li>■ Community engagement</li> <li>■ Environmental compliance</li> <li>■ Value human capital</li> </ul>   | <ul style="list-style-type: none"> <li>■ Environmental compliance</li> <li>■ Health and safety</li> <li>■ Action on GHG emissions</li> <li>■ ESG reporting, transparency and communication</li> <li>■ Promotion and advocacy for a circular economy</li> <li>■ Human rights and modern slavery</li> </ul>   |
| <ul style="list-style-type: none"> <li>■ Continued innovation to produce high- quality metal products</li> </ul>  | <ul style="list-style-type: none"> <li>■ Community engagement, volunteering and partnerships (p 36)</li> <li>■ Environment, Health &amp; Safety (EHS) program to manage local environmental impacts such as dust and noise (p 37)</li> <li>■ Hiring and procurement from local communities</li> </ul> | <ul style="list-style-type: none"> <li>■ Industry association review to ensure alignment with our climate policy</li> <li>■ Shadow carbon price</li> <li>■ Participant in government and industry dialogues and early engagement with regulators/policy makers</li> </ul>   |
| <ul style="list-style-type: none"> <li>■ Understanding customer pathways to report and reduce emissions from secondary metal making</li> <li>■ Increase in varying customer due diligence surveys and requests</li> </ul>   | <ul style="list-style-type: none"> <li>■ Measuring and acting on community and stakeholder engagement in line with FY25 target</li> <li>■ Gentrification of a reassurrounding processing sites</li> <li>■ Acting on biodiversity</li> <li>■ Water stewardship</li> </ul>                              | <ul style="list-style-type: none"> <li>■ Evolving policy and regulatory frameworks (e.g., carbon pricing, secondary materials classifications)</li> <li>■ Advocacy for the circular economy as essential for decarbonisation</li> <li>■ Management of environmental claims</li> </ul>   |

# FY25 Sustainability Strategy Progress

At Sims Limited, our growth and sustainability strategy are aligned. Expanding our circular businesses not only drives our growth but also benefits society.

This year, we are celebrating early successes and the continued strong performance against the goals set in FY22. Highlights include:

- 31% reduction in Scope 1 and 2 emissions from our FY20 baseline
- Number of training courses increased by 26%
- Trained more than 95% of employees on our Code of Conduct, anti-corruption and anti-bribery policies
- Trained 100% of targeted employees on human rights, modern slavery and labour rights





# Protecting our Climate

At Sims Limited, our growth and sustainability strategies are aligned. For detailed insights, stakeholders can refer to our FY24 Climate Report, which aligns with the Taskforce on Climate-related Financial Disclosures (TCFD) and outlines our climate strategy, governance, risk management, metrics and targets and decarbonisation pathway.

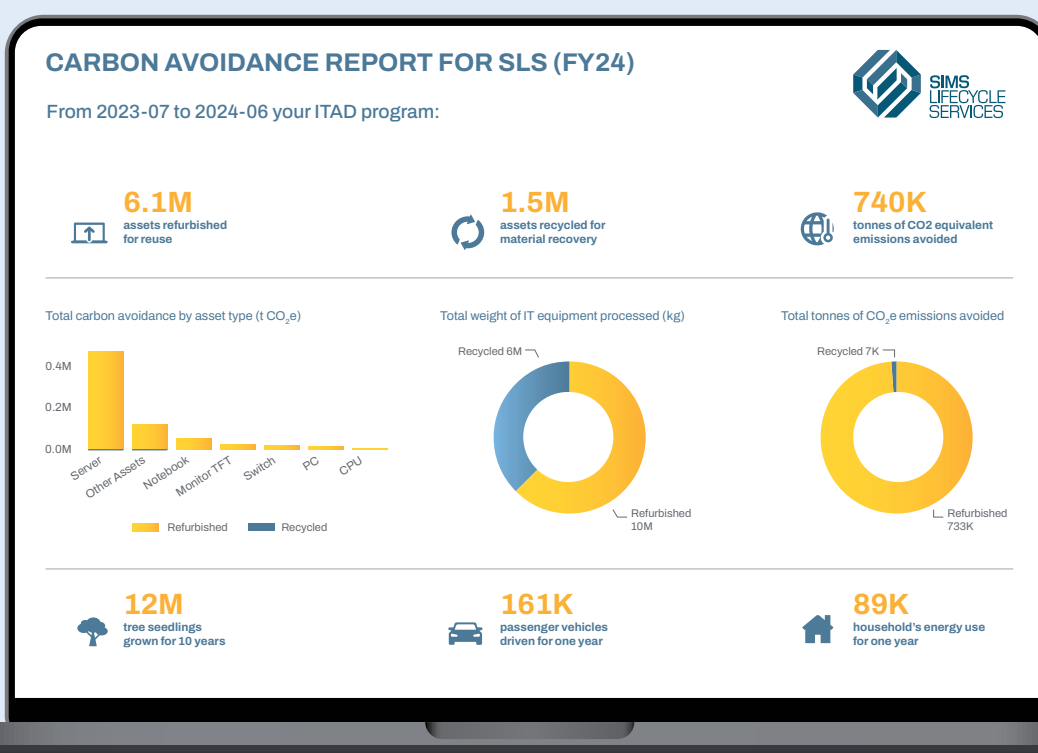
## SLS Refines Sustainability Calculator with Newcastle University

In FY22, Sims Lifecycle Services (SLS) launched its award-winning sustainability calculator, which gives customers insight into the avoided emissions enabled by SLS' services. Using the calculator, we are also able to determine the total emissions avoided by our customers repurposing and recycling IT assets. In FY24, the total avoided emissions impact was 740 kilotonnes of CO<sub>2</sub>e.

Uniquely, the calculator quantifies avoided emissions not only from recycling, but also from the reuse of whole IT assets as well as components. For the second time, SLS partnered with Newcastle University (UK) to host a

graduate student who carried out detailed comparative Lifecycle Assessments (LCAs) using the ISO 14044 methodology for a further four of our key products and carried out extensive market research to provide concrete evidence for second use-phase assumptions.

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.



# Improving Environmental Management

Innovation is at the core of our strategy to minimise our environmental footprint, enabling us to lead the way in sustainable recycling.

As a leader in Metal Recycling, we remain committed to reducing our environmental impact through rigorous internal assessments, technological innovation, and the implementation of control measures. These efforts enable us to drive continuous improvement across our global recycling operations.

## Expansion of environmental awareness and key environmental infrastructure

Our internal Environmental Management system serves as the foundation of our environmental commitment. In FY23, our focus was on environmental trainings, assessments, and critical control verification (CCV) inspections, which led to significant improvements in both FY23 and FY24. In FY24, we took it a step further, by enhancing control measures and fostering a culture of environmental stewardship across the company. Environmental awareness has increased throughout the organisation. This has been done through educational training and assessments. This enables Sims employees to make choices which consider the environment.

Noteworthy improvements from FY24 include:

- Upgrade to stormwater infrastructure (such as improved filtration capabilities of bioretention ponds);
- Expansion of internal industry-specific environmental training modules covering topics such as storm water and air quality;
- Improvements in material storage, including providing covers to prevent water runoff contamination;
- Electrification of equipment to replace diesel and natural gas, where feasible;
- Ongoing use of concrete at facilities to improve stormwater management and reduce environmental impacts.

## Expanding our environmental impact through the acquisition of Baltimore Scrap

In FY24, we expanded our operations by acquiring 17 metal recycling facilities in the US, furthering our commitment to sustainability. Since the acquisition, we have prioritised upgrading these sites to meet our rigorous environmental standards, focusing on improving energy efficiency and minimising waste. This expansion not only increases our capacity to recycle metal but also amplifies our positive environmental impact. By supplying more recycled metals, we help reduce the need for virgin materials, thereby cutting carbon emissions and contributing to a more sustainable circular economy.

## Our next steps

Looking ahead, we are excited to further develop our environmental management system. Key goals for the next fiscal year include expanding our environmental task manager to more effectively manage environmental compliance obligations, creating additional environmental training programs, and developing a more robust platform for tracking environmental information.

As environmental awareness has increased throughout the organisation, driven by training and assessments, our environmental performance has improved.





## Advanced Air Emissions Controls

Metal shredding is a mechanical process in which rapidly rotating heavy machine hammers deconstruct (shred) light gauge end-of-life metal products, such as end-of-life vehicles (ELV) and appliances, so that subsequent processing may separate ferrous and non-ferrous metals from non-metallic materials. The essentially non-metallic material that remains after metals are separated is referred to as automobile shredder residue (ASR) or metal shredder residue (MSR). ASR is typically disposed via landfill, where it reduces the need for virgin soil, minimising land disturbance and lowering the energy impact of soil extraction.

The metal shredding process also has the potential to generate fugitive emissions to air. These emissions are considered “fugitive” because they are not easily captured, and the emissions do not vent through a stack or chimney. These fugitive emissions may be inclusive of steam (because of water sprayed inside the shredder) and particulate matter like dust. Volatile organic compounds (VOCs) can also be emitted during shredding activities, mostly due to residual levels of petroleum products in ELV destined for a metal shredder. To minimise VOC emissions, Sims Metal requires that its ELV suppliers remove fluids, such as oil and fuel, from their ELVs (depollution) prior to delivery to Sims. When Sims purchases whole ELV for recycling, Sims engages in its own ELV depollution prior to shredding feedstock materials. These practices, when

implemented by the responsible employees at Sims, represent the best available means of minimizing VOC emissions at most metal shredders.

Historically, it has been very difficult for metal shredder operators to capture shredder emissions and direct them to a stack. As an understanding of metal shredder emissions has developed, more robust efforts have been made to design systems capable of essentially total emission capture. Now, in very select situations, metal shredder emissions can be captured and directed to an emission control technology for VOC destruction. To date, there are very few metal shredder operations that have installed advanced VOC emissions capture and control technology.

Sims Metal has determined that it is likely appropriate for a small number of its US facilities to be fitted with these controls based on a variety of factors, such as the size and location of the metal shredder and the annual throughput and mix of metal shredder feedstock materials. Sims Metal combines our operational strategies and market information with other criteria to determine the best method for minimizing VOC emissions at each of our shredder locations (i.e., VOC destruction or VOC minimization through depollution). Sims Metal has been actively working with the United States Environmental Protection Agency (EPA) and individual state agencies to permit, design and implement appropriate measures for each of our metal shredders. As such, Sims Metal is currently installing VOC emission controls on its shredder in Chicago, Illinois.

## Working in Pilsen

Sims Metal and its predecessors have operated in the Pilsen neighbourhood of Chicago for more than 30 years. Sims Metal is committed to listening to, and working with, the Pilsen community to ensure that its operations provide the local residents with the same opportunity to enjoy a safe and healthy environment that is available to other Chicago residents.

In addition to our direct engagement with the local community, in 2021 Sims Metal made a commitment (reflected in permit and other documents with the State of Illinois) to install advanced emissions controls for its metal shredder, including controls for destruction of VOC emissions. The State's permit to construct the controls was granted in September 2022, and since that time Sims Metal has been engaged in the design, engineering, fabrication and installation of those controls.

During that time, Sims Metal has been monitoring the air at its facility utilising a network of five monitoring stations, and will continue to do so until that installation is complete. This air monitoring was a requirement from the US EPA to address community concerns prior to completion of installation of the site's advanced emissions controls.

To date, the results of that monitoring have been positive, with the EPA publicly reporting that current facility-wide emission levels have shown no risk of short-term or long-term health effects.

Sims Metal also has undertaken several other operational improvements to address community concerns, including additional dust control measures and the installation of a full enclosure around the metal shredder.

We understand that the Chicago metal shredder will be the smallest metal shredder in the U.S. with these advanced emissions controls and one of just a handful nationwide. Installation of emission controls is nearly complete, with the commencement of commercial operations with the controls anticipated by the end of 2024.

Engagement with the local community in and around Pilsen has been and continues to be our priority. We continue to offer in-person sessions and a virtual engagement room (<https://www.simsmm.com/pilsen/>) with bilingual materials 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 learning's from the Pilsen neighbourhood into our broader social licence, risk management, and community impact frameworks.

## Resource Stewardship

### Water

Water is a key natural resource, and the impacts of climate change further highlight the importance of water stewardship. Water (predominantly mains water) is not an input into the products created by our portfolio businesses, however it plays a crucial role in dust suppression and firefighting. Our 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. In FY24, Sims Limited recorded water usage of 0.67 million cubic metres of water across all sites. More details on water usage are available in the FY24 Sustainability Databook. Water is a significant tool in our dust mitigation processes. Therefore, water usage have increased as we mitigate the impact of dust in our operations.

#### Water withdrawals by business unit (GL)

| Business unit            | FY24 | FY23 | FY22 |
|--------------------------|------|------|------|
| Sims Metal North America | 0.45 | 0.36 | 0.33 |
| Sims Metal APAC          | 0.15 | 0.13 | 0.15 |
| Sims Metal UK            | 0.06 | 0.07 | 0.08 |
| Sims Lifecycle Services  | 0.01 | 0.01 | 0.01 |
| Total                    | 0.67 | 0.57 | 0.57 |

### Chesapeake's New Shear

Sims Metal – Chesapeake facility, located in Virginia, USA, installed a 2,000-tonne, electric stationary shear. The construction and installation project took place in the second half of FY24. Commissioning and commencement of normal operations commenced in September 2024.

The environmental benefits to this installation, include:

- Stationary shearing will reduce the use of diesel-powered mobile shears at the Chesapeake facility from three units to one unit;

### Waste

Automotive shredder residue is the largest single waste stream our portfolio businesses produce, and it is currently disposed of via landfill or energy recovery (in some regions). ASR is the non-metallic residue that remains after shredding end of life consumer goods, such as cars, washing machines and shopping trolleys, to recover the metal for recycling.

In FY24, Sims Limited generated more than 1.1 million tonnes of ASR, incurring costs exceeding \$120 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 suppliers to educate them on sorting and collection processes that minimise waste.

- The power of this particular shear reduces the need for torch cutting operations by at least 70%, reducing the consumption of fuel gases;
- The downstream processing equipment attached to the shear combined with the size and efficiency of this particular shear allows the facility to produce low-residual scrap steel products at high production rates. Facility throughput is anticipated to increase by several hundred tonnes per week; and

Sheared product density will increase by approximately 35% compared to mobile shear products, reducing trucking needs and optimising ship loading operations at the site, further reducing the use of diesel-powered mobile equipment.

The final design of the stationary shear installation will utilise an electric-powered crane, reducing site emissions from fuel combustion.

With similar projects underway at other yards globally, Sims advances its agenda of sustainable practices towards achieving net zero by 2050.





ASR is non-homogeneous, making it challenging to physically separate its various materials, which prevents it from being recycled through conventional methods like those used for metals. To address this, our goal is to repurpose this waste stream into valuable products, thereby enhancing the circularity of our suppliers' supply chains. Sims is actively assessing and developing technology to convert ASR into resources for power generation or foundational materials for circular products.

Sims Limited continues to be committed to the development and application of technology, working with key partners across the value chain to identify opportunities to reduce waste.

#### Landfill waste generated by region (kt)

| Region   | FY24         | FY23         | FY22         |
|--|--------------|--------------|--------------|
| Sims Metal North America (including SMR)                         | 706          | 724          | 852          |
| Sims Metal APAC  | 195          | 234          | 220          |
| Sims Metal UK  | 188          | 167          | 163          |
| Sims Lifecycle Services  | 1            | 2            | 2            |
| <b>Total</b>   | <b>1,090</b> | <b>1,127</b> | <b>1,237</b> |
| Tonne waste per tonne of ferrous proprietary volume <sup>1</sup> | 0.14         | 0.16         | 0.16         |

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. Employees who perform depollution receive appropriate training on safely performing this task, including proper handling and storage of recovered fluids to prevent harm to employee health and the environment.

<sup>1</sup> Ratio is presented for ferrous volume as ASR is a byproduct of ferrous metal shredding. Rounded to nearest whole number.

## Mill Acoustic Enclosure and New Shredder Mill, Brooklyn Victoria

The Mill Acoustic Enclosure and New Shredder Mill were completed in 2024 delivering several key benefits:

- Noise reduction:
  - The installation of an extensive acoustic enclosure significantly reduced noise from the shredding operation
- Improved efficiency with a new generation Shredder Mill:
  - Lowered electricity consumption per tonne of shredded material by 5%
  - Reduced wear-part usage per tonne by 7%
  - Improved shred output density at same power by 10%
  - Lowered air emissions through automated water injection inside mill and dust capture within the large enclosure
  - Improved access safe guards
  - Increased throughput rate enabling daily 'shred to the ground' practices, reducing stockpile sizes and the associated risks with potential fires due to lithium batteries. This will support meeting Sims stockpile management policy and EPA licensing requirements
  - New hydraulic systems improve production efficiency and support safer maintenance practices

The learnings from the Brooklyn Victoria shredder upgrade, will be applied to future projects across the Sims operations.



ENVIRONMENTAL MANAGEMENT

Nature and Biodiversity

The growing need for improved disclosures around biodiversity and natural capital as a key source of value for companies is reflected in the evolving mandatory and voluntary disclosure standards. As Sims Limited's input materials are end-of-life goods, our exposure to nature-related risks in the supply chain is minimal but we are actively engaging in water conservation and nature risk management through the TNFD's LEAP framework and updated policies to better align with biodiversity goals.

In our aspects and impacts register, we have considered the local environment through both direct impacts and the impacts of our control measures, and we will continue to iterate this in line with the LEAP framework. Also, we consider nature into our social licence assessments and in our community impact framework.

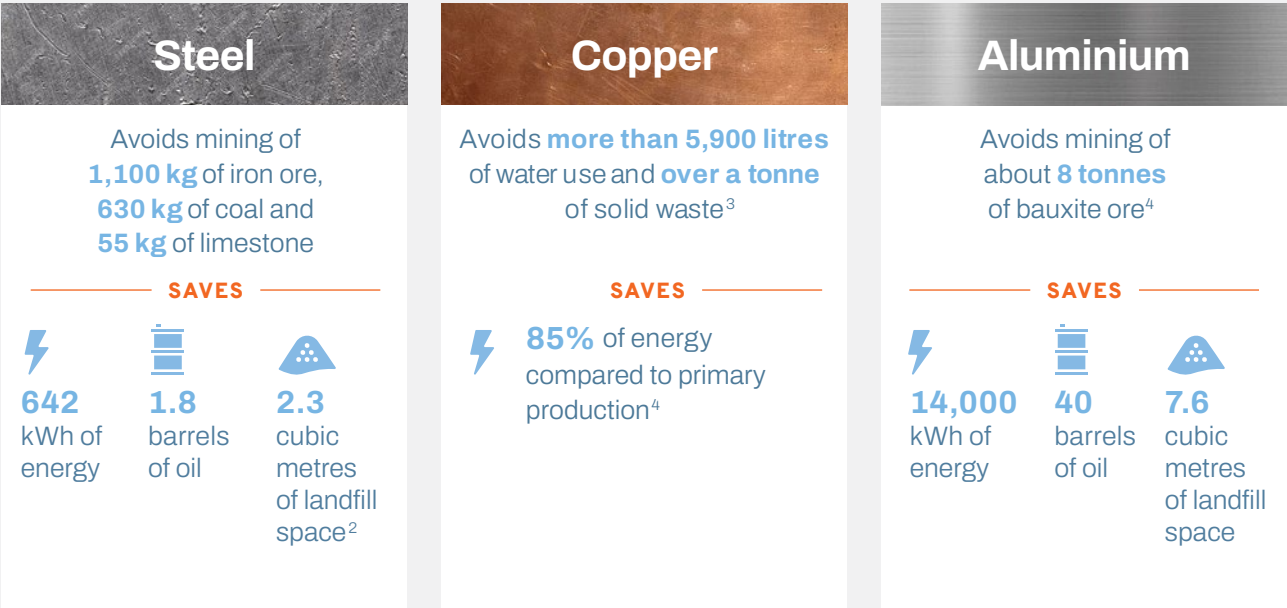
Our role in the metals supply chain plays a crucial role in reducing the demand for mining virgin materials, thereby alleviating the pressure on natural capital, as outlined below.

The Circular Economy and Nature<sup>1</sup>

An estimated 90% of biodiversity loss and water stress has been attributed to resource extraction and processing. Almost 80% of global metal extraction in 2019 occurred in the world's most species-rich biomes, while 90% of mining sites were in areas of relative water scarcity, and almost 50% of extraction occurred at less than 20 kilometres distance from or even within protected areas. By reducing the need for raw materials through circularity, we can reduce pressures on nature.

90%  
of biodiversity loss and water stress  
has been attributed to resource  
extraction and processing.

One tonne of recycled ...



1 <https://www.unep.org/news-and-stories/story/were-gobbling-earths-resources-unsustainable-rate>  
2 <https://www.bir.org/the-industry/ferrous-metals#IMPORTANTFACTS>  
3 <https://www.environment.nsw.gov.au/resources/warrlocal/100058-benefits-of-recycling.pdf>  
4 <https://www.bir.org/the-industry/non-ferrous-metals>

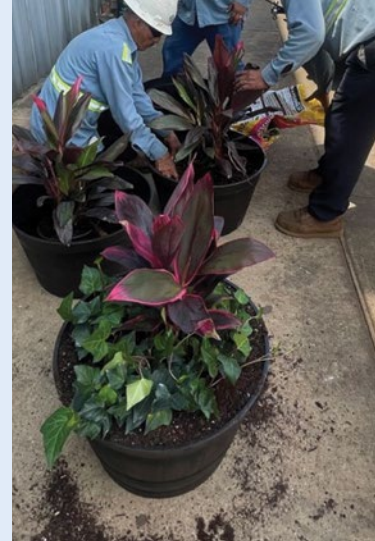
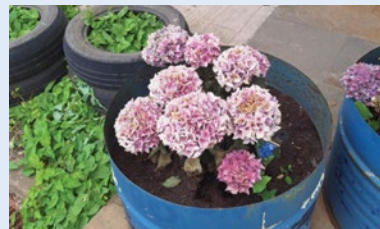


## Celebrating Earth Day

In FY24, EHS and Operations spearheaded global initiatives to make a positive impact during Earth Day and World Environment Day. From cleaning up rubbish to planting greenery around Sims yards, facilities, and in the community, we prioritised meaningful actions throughout the year.

"It's a great opportunity to give back to our local community, something to be proud of. The locations where the trees are planted mean many of our employees see the trees when out and about in their local areas."

**Mike Taylor,**  
Site Manager  
Bristol UK





# Advancing Circularity

## About Sims Lifecycle Services

Sims Lifecycle Services (SLS) provides solutions to extend the life of data centre and enterprise IT assets, and capitalises on the value in used electronics, components and end-of-life materials. SLS works with hyperscale and cloud data centres to reuse and redeploy data centre equipment and supports Fortune 500 companies by securely and responsibly managing their IT asset disposition (ITAD). Our ITAD services offered support the evolution of the electronics industry's movement toward circularity and SLS' clients benefit from data security, maximum IT value recovery, global compliance and sustainable IT use. As a responsible corporate citizen, and in alignment with the UN Sustainable Development Goals, we continuously seek new ways to contribute to the circular economy.

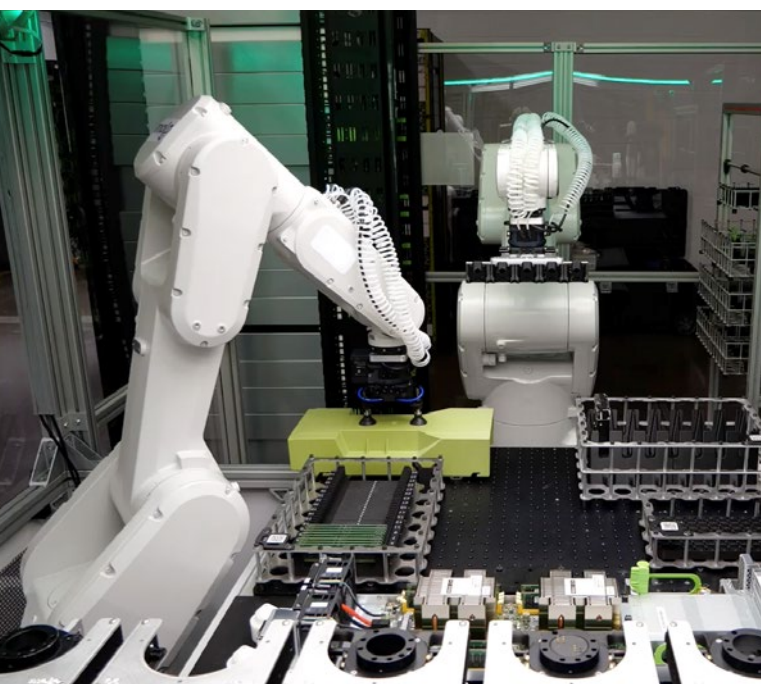
## Innovation for Scale

When the Sims Lifecycle Services (SLS) business unit pivoted to focus on extending the lifecycle of electronics more than six years ago, recycling was still the standard end of life practice for corporations to dispose of their used assets.

Now, we estimate that more than 70% of our key clients have public and internal policies in place related to the responsible handling of their used IT assets. Capitalising on this opportunity, SLS has shown a year-on-year growth in their refurbished units, closing FY24 with more than 6 million units refurbished.



Sims Lifecycle Services is an active member of the [Open Compute Project](#) (OCP). Founded in 2011, it was built on a project by Facebook to develop the world's most energy efficient, hyperscale data centre at lowest possible cost. The purpose since then has remained the same: collaboration for rapid innovation around the entire data centre industry. We are excited to continue engagement with the large member community of companies and start-ups and look forward to explore opportunities to create a more circular data centre environment together.



To enable future growth potential at scale, SLS is investing in and showcasing the opportunities from using microfactories for the disassembly of OCP hardware within SLS' processes. OCP hardware is hardware that has been manufactured according to the designs published by OCP. This is an industry-leading approach and the first time that automation for disassembly is shown effective at scale, promising to set new standards and reshape the landscape of the reverse data centre supply chain.

Microfactories have the potential to be deployed where large volumes of similar designs are available for processing, specifically regarding layout and fasteners. This provides a unique opportunity to engage with large data centre operators and original equipment manufacturers. Additional steps we are taking to advance opportunities to use this technology is providing insights to clients on hardware for reuse and recycling as well as wider industry engagement to promote more circular design of electronics, e.g. through contributions to the World Business Council For Sustainable Development's (WBCSD) [Circular Transition Indicator Guidance for Electronic Devices](#).

## Confident Disclosures: Value Chain Emissions Insights at our Client's Fingertips

Every year, calculating our Scope 1, 2 and 3 inventories is a great undertaking and data quality of Scope 3 emissions a particular concern. As we have put measures in place that will allow us to include more supplier-specific data into our inventory going forward (visit our Climate Report Scope 3 section for more details), we have also taken the opportunity to enable our clients to include supplier-specific emissions for their IT asset disposition programme through SLS. Throughout FY24 we have developed a detailed methodology document and the calculation model. This provides the necessary transparency to our clients to confidently use these figures for their global reporting requirements and provides evidence for emission audits that established frameworks, such as the GHG Protocol's Scope 3 Calculation Guidance, were followed.

We are confident in our standardised reporting. It allows us to provide clients in all jurisdictions with the reports they need. This ensures compliance with evolving mandatory and voluntary disclosure standards. These standards range from the EU's Corporate Sustainability Reporting Directive (CSRD) to California's Climate Corporate Data Accountability Act (SB 253). The reports cover various areas, including carbon emissions and materials recovered during recycling. Our reporting offering is available to all clients and complementary to our industry-leading sustainability calculator which quantifies the positive impacts of reuse and recycling activities for our clients since 2021. Combining these metrics provides a holistic view and the continued decarbonisation of our business activities supports reduction of our clients' and the industry's emissions at large.





# Ensuring Safe Working Conditions

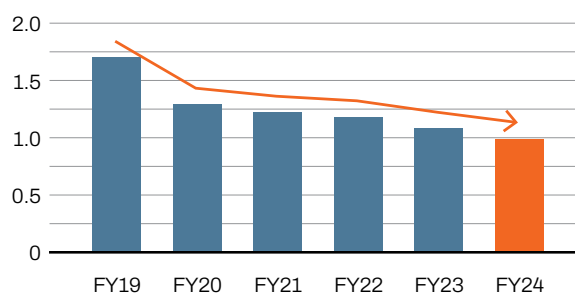
Sims takes a practical continuous improvement approach to Environment, Health and Safety. A strategy developed to focus on the application, effectiveness and adoption of control measures, proven effective with subsequent year-over-year reduced injury experience.

FY19 saw a challenging year with over 100 recordable injuries equating to a Total Recordable Incident Frequency Rate (TRIFR) of 1.70. Sims therefore set a goal to reduce TRIFR to 1.00 or lower within five years; this is recognised as world class safety performance by various institutions. Sims focused attention on key risk factors consistent throughout the business and invested resources on control measures to prevent critical, potentially fatal risks. These efforts have transformed all sites around the world. This method of tactical standardisation has seen not only reductions in severity of incidents, but also a total reduction in recordable injury rates. In FY24, Sims met the 5-year TRIFR target with a rate of 0.99.

For the first time in company history, no lagging (reactive) indicators were used as targets to incentivise safety improvement. Only leading (proactive) indicators were used to measure performance and motivate continuous improvement actions. Despite de-emphasising injury rates, the increased attention to proactive safety activities and control measures ultimately resulted in reduced injury results.

Through an ongoing partnership with globally renowned occupational psychologists, Sims has further emphasised psychological safety principles and trust-based relationships between employees and management, driving safety culture forward.

Injury Rates FY19 to FY24



A six-module program was assigned and completed, followed by the company's first Mental Health and Wellbeing program.

## The programs covered key concepts and principles, including:

1. Psychological Safety
2. Control and Influence
3. Courageous Communication
4. Incident Learning
5. Continuous Improvement
6. Mental Health & Wellbeing

The program was a resounding success, receiving a 4.8 out of 5-star rating from Sims employees who participated in the training:



One of the best trainings I have ever had.



Excellent training package, very professional and delivery was great. Thank you.



Very informative, well put together and easy to understand thank you.



Good course: Comprehensive content, engaging instructions, and valuable practical exercises. It was a worthwhile learning experience!



I feel that this is the best course on Sims University in memory, and it will be noticeably impactful when adopted.



Enjoyed all 5 Modules lots to learn from. Great content.

The mental health and wellbeing program was hosted by two Mental Health practitioners from the USA and Australia. A two-part program, the first designed for all Sims employees, and the second for leadership, addressed various topics to enhance understanding, and reduce the stigma of mental health conditions.

The [EHS Policy](#) was also updated, committing to providing a psychologically safe work environment, published December 2023.



## What changed in FY24?

- Lagging indicators (Total Recordable Injury Rate & Lost Time Injury Rate) were not targeted with percentage reduction goals, and not tied to any remuneration/ bonus plans
- Leading Indicators, were assigned to leaders on every site, for monthly completion which included:
  - **Critical Control Verifications** (evaluation of the effectiveness of controls throughout job task processes)
  - **EHS Inspections** (Standard and regulatory compliance-based audits)
  - **Corrective Action Closure** (evidence based corrective action application)
  - **EHS Training** of Standard Requirements (internally developed training videos demonstrating how to interact with control measures) including leadership training completion: COMMIT To CARE program, Mental Health and Wellbeing
  - **Incident Learning** (completion of root cause analysis focused on system, processes, conditions and controls)

### FY24 leading indicator performance

**98%**

CCV %  
to target

**98%**

Inspection %  
to target

**96%**

Actions %  
to target

**98%**

Critical risk  
action closure

**97%**

Critical risk  
incident learning

**96%**

EHS  
training

These changes in focus, tools and action have in a short period of time reduced the risk profile of Sims Limited, and improved safety culture.

In FY24, 17 sites were acquired and successfully integrated into our business. Despite the challenges of onboarding new acquisitions, these sites quickly adopted our proven critical risk control measures, effectively lowering their risk profile and preventing critical incidents.

Site leaders from these recent acquisitions shared the following thoughts on the continuous improvement efforts at Sims:

“Transitions like this can be nerve-wracking, but from day one until now, we’ve seen significant safety improvements across the entire yard. Having someone available to guide us through this transition has been wonderful.”

**John Keller,**  
Operations  
Manager



Fires: an Escalating Threat

As society’s reliance on lithium-ion batteries increases, Sims has seen an increase in fire-related incidents. Sims has long maintained preventive measures to protect sites, assets, and personnel from inbound materials that are non-conforming with our policy and pose a risk. These preventative measures include supplier education initiatives and a thorough inspection process to identify materials that pose potential fire risks. Sims Limited actively engages with the Fire Departments to ensure our efforts are aligned when responding to fires. These programs are highly effective, resulting in the identification and removal of tonnes of non-conforming materials from inbound shipments each month worldwide.

Prohibited Materials



Welcome & thank you for  
choosing our facility

DANGEROUS MATERIALS WE CANNOT ACCEPT

|   |   |  |   |
|---|---|--|---|
| <br>ASBESTOS  | <br>EXPLOSIVES /<br>ORDINANCE                     | <br>FLAMMABLE<br>LIQUIDS & GASES                         | <br>RADIOACTIVE<br>MATERIAL                     |
| <br>TOXIC / CORROSIVE /<br>OXIDISING<br>SUBSTANCES | <br>POISONS                                      | <br>GAS BOTTLES /<br>PRESSURE VESSELS /<br>ACCUMULATORS | <br>RECHARGEABLE /<br>LITHIUM-ION<br>BATTERIES |
| <br>NON-METALLIC WASTE                             | <br>CFC GASES / OZONE<br>DEPLETING<br>SUBSTANCES | <br>UNCLEANED DRUMS                                     | <br>BIOLOGICAL /<br>MEDICAL WASTE              |

THINK SAFE, WORK SAFE, HOME SAFE

Sims personnel are highly aware of the dangers posed by non-conforming materials and remain vigilant in identifying them. While items like propane and fuel tanks are easily detected through inspections, lithium-ion batteries present a greater challenge due to their presence in countless products. When damaged, these batteries can generate intense heat.

A damaged lithium-ion battery can trigger a chemical reaction known as thermal runaway, which can produce temperatures of up to 700 degrees Celsius in seconds. This reaction doesn’t require oxygen to burn, rendering traditional firefighting methods a challenge.

As lithium-ion batteries become more common in everyday items, from scooters to greeting cards, the risk of fires continues to rise. Through our Fire Prevention and Lithium-Ion Battery training modules, Sims employees are equipped with the knowledge to manage these hazardous items, understand lithium-ion thermal runaway, and follow our comprehensive fire strategy.

- Fire Prevention
  - Supplier education
  - Public/Regulator awareness
- Fire Mitigation
  - Inbound inspection processes
  - Stockpile management
- Fire Response
  - Fire drills
  - Early detection and quick response





# Cultivating a Diverse Workforce

## Diversity, Equity and Inclusion (DEI)

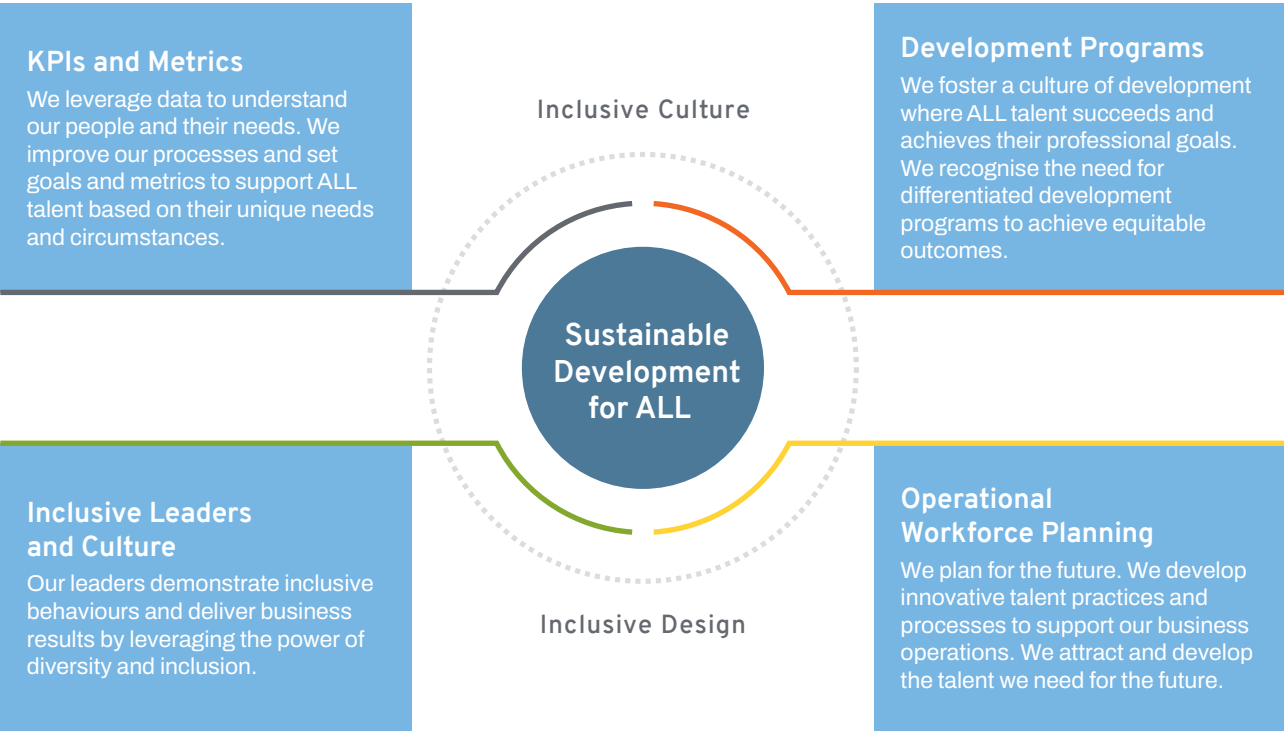
### DEI Strategic Framework

DEI strategy has been designed to be fully integrated with our business strategy and our Purpose.

A key initiative implemented in FY24 were the regional roadmaps, which were developed by regional leaders using a data-driven approach.

In FY24 we have redesigned our competency model to incorporate Inclusion as a core behaviour for all employees, set to launch in the FY25 performance cycle.

Leaders are accountable for implementing regional DEI initiatives, tracking their progress, and applying insights across the business to drive success.



## PEOPLE

### Gender Diversity

In FY24, women held 21% of senior leadership roles, down slightly from FY23. This decline resulted from business simplification, which disproportionately affected support functions where we see higher concentration of women leaders. Despite this impact, we remain committed to achieving our goal of 25% of women in senior leadership roles. Externally, we took steps to make the content of our marketing and recruitment materials more inclusive. This includes adopting gender-neutral language in advertising, ensuring diverse representation in imagery, and emphasising our purpose and commitment to sustainable businesses.

Additionally, we broadened our recruitment efforts by partnering with external resources to increase representation of women and other underrepresented groups. The “Sims in School” initiative involved sending representatives to schools in Darwin, Kwinana, and Auckland, offering site tours and engaging students. We launched a pilot program in Australia and New Zealand, “Equipping for Growth”, aimed at career mapping for key talent in weighbridge roles, traditionally a gateway for women entering Sims’ operations. The initiative supports transitions into frontline management and leadership, with a focus on improving gender diversity.

We allocated a dedicated budget for facility improvements to create more welcoming and equitable environment, supporting our commitment to gender diversity and inclusivity. In FY24, upgrades were completed at 30 sites, with another 14 sites identified for FY25.

### Pay Equity

In FY22, Sims Limited implemented a standardised global methodology for calculating the gender pay equity metric, replacing the previously varied country-specific metrics that were influenced by local regulations. This change allowed us to report a more consistent and transparent view of our global efforts to address gender pay disparities. In FY24, each of our regions allocated a portion of the annual pay increase budget to address gender pay equity. At the year end the gender pay equity metric was 3.3%. In addition to the gender pay equity review, we also conducted 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 at Sims Limited compared to white staff. The gap was relatively small, and some corrective actions were taken in FY24 to narrow the gap.

# 21%

of senior leadership  
roles were held by  
women in FY24

### Women Leading @ Sims Limited

As part of our strategy to expand career development and leadership opportunities for women, we launched the Women Leading @ Sims program in 2021, with the fourth cohort commencing in September 2024. The program continued to provide key talent with learning experiences and networking opportunities, exposing them to our strategic and transformational initiatives.

Led by an external facilitator and executive leadership coach, participants engage in peer coaching to strengthen their leadership capabilities and broaden their understanding of Sims Limited’s business portfolio. They also have the opportunity to connect directly with members of our Board of Directors and executives across the business. By the end of the program, these leaders gain a comprehensive view of the business combining knowledge and experience to support their growth within the organisation.

The program has continued to receive positive feedback and 44% of the alumni from previous cohorts having been promoted or taken on wider responsibilities post programme completion.

As part of the FY24 Organisation Capability Review process, our leaders have identified 30 additional high-potential women who will be invited to participate in the Women Leading @Sims program over the next several years.







## Innovate RAP

In FY24, we advanced our reconciliation journey by participating in the second year of Innovate, achieving key milestones aligned with our commitment to reconciliation.

Central to our goals is our commitment, as a leader in the circular economy, to continue to build on our role in promoting reconciliation across our operations and in our sphere of influence, with a focus on the RAP core pillars of Relationships, Respect, and Opportunities.

We strengthened relationships with other RAP organisations and Aboriginal and Torres Strait Islander businesses.

We continued to show respect by providing cultural awareness training to our Senior Leaders and RAP Working Group led by JB Aboriginal Strategy & Consulting, a new First Nations partner, helping us to shape strategies for employee recruitment and engagement. During NAIDOC week 2024, we hosted a 'Lunch & Learn' series on Aboriginal and Torres Strait Islander art, storytelling, and a First Nations worker journey at Sims.

Additionally, our Metals business launched a joint venture with Yurra Pty Ltd, delivering metal recycling services in the Pilbara region.

For National Reconciliation Week, we shared a video with employees highlighting the 2024 theme, "Now More than Ever", reinforcing the ongoing need for reconciliation and justice.





## High Performance and Engaged Workforce

We are committed to helping our employees to reach their full potential by fostering a work environment that empowers them to perform at their best. This is key for maintaining high- performing teams and achieving our purpose.

### Understanding and improving the employee experience

Understanding employee motivation and improving their experience is a priority at Sims Limited. As part of this, the Employee Experience & Culture Committee (EXC) continued to drive improvement in employee experience and engagement across five key areas: career growth and training; feedback and recognition; communication; work environment and purpose and direction. The EXC committee members propose initiatives to address areas of opportunity and enhance the employees' experience

across the company. Notable successes from these efforts include:

- Identified global tenure programs for consolidation
- 106 year anniversary celebrations provided a list of changes and improvements made across the regions
- Pillars of Purpose were reviewed and updated and fully embedded across the business.

Although we initially planned to deploy the next employee engagement survey in FY24, we postponed it to FY25 to focus on gathering high-quality data from the safety culture and diversity, equity, and inclusion surveys. These surveys provided valuable insights and confirmed strong engagement within the organisation, with the DEI survey achieving a notable net promoter score of 80%.





## 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



## Enabling High-Performing Teams

As part of our commitment to cultivating a high-performing culture that aligns with our core values and the behaviours outlined in our Pillars of Purpose, all employees participating in the performance review process evaluate their adherence to these shared principles and how they apply to their roles. This is done during both mid-year and end-year reviews using our human capital management (HCM) system, ensuring consistency and alignment across the organisation. 77% of our workforce receive their performance review using our automated human capital management (HCM) system, and we are continuously working on extending the HCM access to those who still receive a review via other processes. Utilisation of our HCM not only improves efficiencies, but ensures we reinforce our focus on driving organisational cohesion and accountability.

# 77%

of employees receive their performance reviews through our automated human capital management system (HCM)

### Leadership Development

Commit to Care program is a key leadership development initiative at Sims, focused on fostering a psychologically safe, inclusive, and high-performing work environment. It positions safety and people management as essential leadership responsibilities, equipping leaders with the tools to support these. Some of the leadership development benefits are the following :

- Cultivates inclusive leadership skills.
  - Strengthens the ability to create psychologically safe spaces for teams.
  - Provides consistent leadership standards across all levels.

Leaders across the company have embraced the program, with strong feedback highlighting its relevance and practical application. It continues to be a foundational part of leadership development, rolled out to all new and promoted leaders to ensure consistency in leadership quality.

### Leader's Commitment @ Sims

is a comprehensive curriculum  
that consists of the courses  
Commit to Care and Commit to Lead







### Sims University Learning Center

Sims Limited employs a globally distributed workforce and connecting with employees can be difficult – especially when most employees do not sit behind a desk. In 2019, we launched our internal learning platform, the Sims University Learning Center – affectionately referred to as Sims U – which connects with employees from all over the world with vital work-related information, assessments, and training material.

Sims University has a catalogue of more than 1,500 courses, which is available across a wide variety of topics, including – but not limited to – operations, professional development, systems and technology, health, safety and wellness. Training completions increased in FY24 as employees completed in excess of 100,000 courses this year. We also allow employees to upload training they completed externally, or via facilitated sessions, into the Sims University Learning Center. This way, 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 helps to facilitate access for those who do not have access via a company computer.

# >100K

Sims University courses  
were completed by  
our employees in FY24



# Investing in our Communities

**At Sims Limited positive relationships with the communities where we operate are fundamental to both the success of our operations and to progressing our purpose; to create a world without waste to preserve our planet.**

This year Sims sharpened its focus on strengthening community relationships and delivering local value, aligned with community feedback and priorities. Recognising that local actions are crucial to maintaining our social licence, we continued embedding the social licence framework introduced in FY23 into daily operations. The framework enables targeted community engagement while enhancing site capabilities to proactively address stakeholder needs.

In FY24, we intensified monitoring of key sites, implemented identified actions, and built local capacity through training, better access to expertise, and a new matrix governance model that strengthens community and government relations oversight.







Looking ahead to FY25, we will expand the social licence framework across additional sites in Australia and New Zealand. We will also finalise and roll out a new external communications and engagement policy, reinforcing our commitment to listening and collaborating with stakeholders.

As an industrial business operating near residential and business areas, we recognise that engaging with our communities is critical to improving operations and contributing to sustainable communities. Our efforts include volunteering, job creation, training, and support for local environmental groups, charities, and schools, as well as targeted community investments. Importantly, our core business of buying end-of-life materials, including from local peddlers, creates direct economic opportunities within the communities we serve.

**As an industrial business operating near residential and business areas, we recognise that engaging with our communities is critical to improving operations and contributing to sustainable communities.**





# Focus on Integrity

## Human Rights

At Sims Limited, we are committed to respecting and supporting internationally recognised human rights in accordance with the UN Universal Declaration of Human Rights and the UN Guiding Principles for Business and Human Rights.

In FY24, we've progressed our commitments to help eliminate modern slavery in several ways, including:

- Analysing and addressing gaps in our operations and supply chain controls
- Raising awareness of our hotline, empowering employees and third parties to report concerns
- Embedding strict requirements with labour agencies and providing training to recognise and prevent unethical practices like bribery and corruption

More details will be disclosed in our FY24 Modern Slavery Statement, which will be posted to our website in December.

## Promoting Ethical Conduct

Sims Limited is committed to ethical behaviour that builds trust and creates long-term value. We ensure employees understand the importance of acting with honesty, fairness, and integrity through our governance framework which includes our Code of Conduct, policies, and training programs. This includes annual Code of Conduct training, new hire onboarding, and our Ethics E Compliance Month, with brief, engaging content on key topics. In 2024, the company was recognised on Newsweek's list of America's Most Responsible Companies for the fourth consecutive year, further solidifying our commitment to ethical leadership.

Sims Limited is committed to  
**ethical behaviour**  
which builds trust and creates  
long-term value



## Privacy and Security

Sims Limited prioritises robust privacy and security measures to protect data and information. Our practices align with industry standards, and no reportable security breaches occurred in FY24.

We strengthened our cybersecurity using advanced technologies such as virtual private networks (VPNs), multi-factor authentication (MFA), and encryption. We benchmarked our practices against the National Institute of Standards and Technology (NIST) cybersecurity framework, improved awareness training, and conducted internal and external audits alongside phishing simulations and external audits and simulated phishing tests.

Key actions in FY24 included:

- We maintained technologies to improve our overall cyber security landscape, including but not limited to, global VPNs, MFA, robust anti-virus/anti-spyware/anti-malware software technologies, data protection via encryption and machine authentication.
- We completed a benchmark of our organisation against the National Institute of Standards and Technology (NIST) cybersecurity framework.
- We enhanced our information security/cybersecurity awareness training program by leveraging various internal communication channels, including email (frequent publication of cybersecurity articles) and MySims, our company intranet, (security videos and Cybersecurity Awareness newsletter).
- We 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.
- We deployed our mandatory Annual Cybersecurity Training video, which is managed through the Sims University Learning Center.
- We conducted bi-monthly internal simulated phishing testing attacks and enhanced our KPI reporting.
- We maintained appropriate cyber insurance.
- We implemented a robust incident response strategy in partnership with third-party services providers of managed detection and incident response and conducted our annual global incident response tabletop exercise.
- We 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 details our executive remuneration philosophy, overseen by the Board Committee and shareholders. We use the Korn Ferry/Hay Grading methodology for consistent role evaluation to evaluate internal pay fairness. We participate in independent salary surveys to validate that we are market competitive.

We ensure entry-level wages exceed minimum requirements and respect employees' rights to unionise and bargain collectively. Details on collective bargaining coverage are available in the sustainability databook.

## Economic Contribution

FY24 sales revenue was \$8.6 million, a 6.2% increase from FY23, due to an 8.7% increase in metal average sale prices in FY24, partially offset by decrease in volumes. Sales volumes were 9,203 million tonnes in FY24, a 2.4% decrease compared to FY23 due to challenging market dynamics and a strategic focus on prioritising margin over volume. The year ended with an underlying EBIT of \$42.9 million.

The contribution of Sims Lifecycle Services to underlying EBIT was up 41.3% due to increased activity.

## Tax Matters

During FY24, Sims Limited published its' [FY23 voluntary tax contribution report](#) to provide information that will help communities, investors, and other stakeholders, better understand Sims Limited's tax strategy, governance, and compliance with Australian and international tax laws. This will help increase community confidence that Sims Limited pays its appropriate share of taxes. These disclosures also demonstrate our strong commitment to transparency to all of the Company's stakeholders.

Sims Limited strives to pay the right amount of tax at the right time in the jurisdictions where we create value. This is consistent with our commitment to sustainability, being socially responsible, and operating our businesses 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 timely to the executive leadership team, internal and external audit and the Audit Committee of the Board of Directors.

## EXTERNAL RECOGNITION



World's Most Sustainable  
Corporations (Global 100 – #1)



Corporate Knights  
and As You Sow



AAA ESG rating categories



B grade in 2023



Low ESG risk<sup>1</sup>



TAHITO Te Tai Rehua Fund –  
TransTasman Equity Fund , supporting  
Indigenous ethical investing 2024

Member of  
**Dow Jones  
Sustainability Indices**

Powered by the S&P Global CSA



FTSE4Good

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## CONTACT

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

**Ana Metelo**

Global Director Investor Relations  
& Sustainability

[ana.metelo@simsmm.com](mailto:ana.metelo@simsmm.com)







## 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 sustainability 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 sustainability data is the sole responsibility of Sims. Sims is responsible for the preparation and fair presentation of the GHG emissions statement and select sustainability 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 sustainability 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 sustainability 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 sustainability data covered by the assurance:

- Operational Control
- Worldwide
- Exclusions from the scope of Sims' GHG emissions assertion are:
  - Refrigerants

Types of GHGs: CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub>

GHG Emissions and Sustainability Data Statement:

- Scope 1: 79,621 metric tons of CO<sub>2</sub> equivalent
- Scope 2: Location-Based: 66,347 metric tons of CO<sub>2</sub> equivalent
- Scope 2: Market-Based: 22,801 metric tons of CO<sub>2</sub> equivalent
- Scope 3:
  - Category 1 - Purchased Goods & Services: 147,897 metric tons of CO<sub>2</sub> equivalent
  - Category 2 - Capital Goods: 42,507 metric tons of CO<sub>2</sub> equivalent
  - Category 3 - Fuel- and Energy-Related Activities: 38,850 metric tons of CO<sub>2</sub> equivalent
  - Category 4 - Upstream Transportation and Distribution: 859,114 metric tons of CO<sub>2</sub> equivalent
  - Category 6 - Business Travel: 3,587 metric tons of CO<sub>2</sub> equivalent
  - Category 10 - Processing of Sold Products: 3,446,969 metric tons of CO<sub>2</sub> equivalent
  - Category 11 - Use of Sold Products: 3,330,477 metric tons of CO<sub>2</sub> equivalent
  - Category 15 – Investments<sup>1</sup>: 46,767 metric tons of CO<sub>2</sub> equivalent
- Total Water Consumption: 669,564,373 liters
- Total Waste Volume (automotive shredder residue only): 1,099,371 metric tons
- Total NO<sub>x</sub> and SO<sub>2</sub> Air Emissions (from combustion sources): 1,233 metric tons

<sup>1</sup> Joint ventures with Kariyarra and Ngardimu are excluded due to lack of data availability.



- Total Energy Consumed: 1,876,522 gigajoules
- Gender Pay Gap: -3.3%
- Health and Safety Data
  - Critical Risk Incident Rate: 0.64
  - Total hours worked: 11,510 thousand hours
  - Total recordable injuries: 57
  - Fatality count: 0
  - High-consequence injury count: 5
  - High-consequence injury rates (per 200,000 hours and per 1,000,000 hours)
    - Per 200,000 hours: 0.09
    - Per 1,000,000 hours: 0.43
  - Recordable work-related injury rates (per 200,000 hours and per 1,000,000 hours)
    - Per 200,000 hours: 0.99
    - Per 1,000,000 hours: 4.95
  - Number of lost time injuries: 13
  - Lost time injury frequency rates (per 200,000 hours and per 1,000,000 hours)
    - Per 200,000 hours: 0.23
    - Per 1,000,000 hours: 1.13

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 sustainability data assertions were generally historical in nature, but in some cases estimated.

Period covered by assurance:

- Fiscal Year 2024 – July 1, 2023 to June 30, 2024

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
- OSHA and US Bureau of Labor Standards (Safety Data)
- Company criteria (Sustainability Data)

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 and their consultants;
- Review of documentary evidence produced by Sims and their consultants;
- 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.

Sustainability 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 and their consultants 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 and their consultants;
- 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 sustainability data statement shown above, Apex found no evidence that the GHG emissions statement and sustainability data statement:

- is not materially correct and is not a fair representation of the GHG emissions and sustainability 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 sustainability 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:

A blue ink signature of Jessica Jacobs, written in a cursive style.

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

A blue ink signature of David Reilly, written in a cursive style.

David Reilly, Technical Reviewer  
ESG Principal Consultant  
Apex Companies, LLC  
Santa Ana, California

October 23, 2024

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 statement.



## INDEPENDENT LIMITED ASSURANCE STATEMENT

To: The Stakeholders of Sims Limited and Sims Lifecycle Services

Apex Companies LLC, (Apex) was engaged to provide limited assurance of the greenhouse gas (GHG) emissions reported by Sims Lifecycle Services (SLS), a wholly-owned subsidiary of Sims Limited, 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 is the sole responsibility of SLS. SLS is responsible for the preparation and fair presentation of the GHG emissions statement in accordance with the criteria. Apex's sole responsibility was to provide an independent assurance opinion on the accuracy of the GHG emissions 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 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 sustainability data covered by the assurance:**

- Operational Control
- Worldwide
- Exclusions from the scope of SLS' GHG emissions assertion are:
  - Refrigerants

**Types of GHGs:** CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub>

### **GHG Emissions Statement:**

- **Scope 1:** 1,120 metric tons of CO<sub>2</sub> equivalent
- **Scope 2: Location-Based:** 2,129 metric tons of CO<sub>2</sub> equivalent
- **Scope 2: Market-Based:** 39 metric tons of CO<sub>2</sub> equivalent

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

### **Period covered by assurance:**

- Fiscal Year 2024 – July 1, 2023 to June 30, 2024

### **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

### **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

### **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 SLS and their consultants;
- Review of documentary evidence produced by SLS and their consultants;
- Review of SLS' 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 SLS to determine GHG emissions.

#### **Assurance Opinion:**

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

- is not materially correct and is not a fair representation of the GHG emissions and sustainability 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).

It is our opinion that SLS has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of the GHG emissions 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:**

A handwritten signature in blue ink, appearing to read 'Jessica Jacobs'.

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

A handwritten signature in blue ink, appearing to read 'David Reilly'.

David Reilly, Technical Reviewer  
ESG Principal Consultant  
Apex Companies, LLC  
Santa Ana, California

October 27, 2024

*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 statement.*



## VERIFICATION OPINION DECLARATION GREENHOUSE GAS EMISSIONS

To: The Stakeholders of Sims Limited

Apex Companies, LLC (Apex) was engaged to conduct an independent verification of the greenhouse gas (GHG) emissions reported by Sims Limited (Sims) for the period stated below. This verification opinion declaration applies to the related information included within the scope of work described below.

The determination of the GHG emissions is the sole responsibility of Sims. Sims is responsible for the preparation and fair presentation of the GHG emissions statement in accordance with the criteria. Apex's sole responsibility was to provide independent verification on the accuracy of the GHG emissions 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 based on the verification. Verification activities applied in a limited level of assurance verification are less extensive in nature, timing, and extent than in a reasonable level of assurance verification.

### Boundaries of the reporting company GHG emissions covered by the verification:

- Operational Control
- Worldwide

**Types of GHGs:** CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub>

### GHG Emissions Statement:

- **Scope 3:**
  - **Use of Sold Products:** 3,329,172 metric tons of CO<sub>2</sub> equivalent

Data and information supporting the Scope 3 GHG emissions statement were in some cases estimated rather than historical in nature.

### Period covered by GHG emissions verification:

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

### Criteria against which verification was conducted:

- WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Scope 3)

### Reference Standard:

- ISO 14064-3 Second Edition 2019-04: Greenhouse gases -- Part 3: Specification with guidance for the verification and validation of greenhouse gas statements

### Level of Assurance and Qualifications:

- Limited
- This verification used a materiality threshold of ±5% for aggregate errors in sampled data for the above indicator.

### GHG Verification Methodology:

Evidence-gathering procedures included but were not limited to:

- Interviews with relevant personnel of Sims and their consultants;



- 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 of data used by Sims to determine GHG emissions.

**Verification Opinion:**

Based on the process and procedures conducted, there is no evidence that the GHG emissions statement shown above:

- is not materially correct and is not a fair representation of the GHG emissions data and information; and
- has not been prepared in accordance with the 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 these GHG emissions for the stated period and boundaries.

**Statement of independence, impartiality 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, 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



David Reilly, Technical Reviewer  
ESG Principal Consultant  
Apex Companies, LLC  
Santa Ana, California

October 23, 2024

*This verification opinion declaration, 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.*

**Create a world without waste  
to preserve our planet.**



