



Security Policy

Global SRS

SEC-COR-POL-01

Introduction

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

Policy

Sims Metal Management (SMM) has an over-arching Information Security Policy, designed to protect its Information Assets to ensure:

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

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

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

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

Commitment

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

Ingrid Sinclair
Global President

| Revision Date | Rev | Originator / Dept. | Approval / Dept. | Page |
|----------------------------|-----|-----------------------|------------------|--------|
| 04/22/2019 | 02 | L.Scott / SHECS + Q&S | Ingrid Sinclair | 1 of 1 |
| Information Classification | | Unclassified | | |