

Workplace Diversity Policy

At Sims Metal Management Limited (SMM) we recognize the value and advantages of having a diversified workforce that reflects the diversity of the communities in which we operate.

Our Workplace Diversity Policy is designed to support our organizational core values of respect, integrity and teamwork, and our strategic business objective to sustain and grow our leadership position in the marketplace.

We firmly believe that it is essential to attract, retain and develop the highest caliber of employees from the widest community possible. Therefore, we will continue to foster our merit-based advancement culture to ensure that employees are selected, trained and promoted based on their achievements, experiences and values as recognized by SMM.

We are committed to ensuring that all employees should be able to work in an environment that provides equal employment opportunities for all and has procedures in place that facilitate and support a culture of diversity.

Our Workplace Diversity Policy establishes overall diversity expectations for the SMM Group, while regional business units will be responsible for developing procedures and practices to advance diversity that are suited to their unique operating environments and conditions.

Within the legal and cultural parameters of the countries in which we operate, we will:

- Engage our workforce by effectively communicating our Workplace Diversity Policy to all employees and stakeholders;
- Continue to maintain the established culture of equality and respect;
- Embrace and promote diversity throughout SMM;
- Enhance our current reporting procedures to allow us to track our diversity progress on a global basis and enable us to share best practices across regional business units;
- Ensure all employees have equal access to workplace opportunities and training and development programs;
- Continue to maintain and promote a culture of equality and respect and provide a workplace free from discrimination, harassment and abuse; and
- Maintain and expand SMM's talent management and development programs.

The SMM Board has responsibility for establishing and monitoring SMM's overall diversity strategy and policy.

The Board's Remuneration Committee has an overarching role to:

- review, note and monitor the effectiveness of this Policy;
- · review and approve the measurable objectives for achieving diversity, and
- annually review both those objectives and progress in achieving them, including the relative proportion of women at all levels.

The Board's Nomination/Governance Committee has responsibility to:

- monitor the effectiveness of this Policy to the extent it relates to Board diversity; and
- review and recommend any update to this Policy as deemed necessary.

This Policy is available for viewing on SMM's website at www.simsmm.com