

Sims Metal Management is required, by law, to publish an annual Gender Pay gap report.

This is its report for the snapshot date of 6 April 2018.

- The mean gender pay gap for hourly paid employees at Sims Metal Management is 2.38%
- The median gender pay gap for Sims Metal Management is -2.81%.
- The mean gender bonus gap for Sims Metal Management is -24%.
- The median gender bonus gap for Sims Metal Management is -100%.
- The proportion of male employees in Sims Metal Management receiving a bonus is 31.19% and the proportion of female employees receiving a bonus is 14.74%

Pay quartiles by gender

Band	Males	Females	Description
A	80.85%	19.15%	Includes all employees whose standard hourly rate places them at or below the lower quartile
B	85.56%	14.44%	Includes all employees whose standard hourly rate places them above the lower quartile but at or below the median
C	79.68%	20.32%	Includes all employees whose standard hourly rate places them above the median but at or below the upper quartile
D	82.35%	17.65%	Includes all employees whose standard hourly rate places them above the upper quartile

The figures set out above have been calculated using the standard methodologies used in the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

What are the underlying causes of Sims Metal Management's gender pay gap?

Under the law, men and women must receive equal pay for:

- the same or broadly similar work;
- work rated as equivalent under a job evaluation scheme; or
- work of equal value.

Sims Metal Management is committed to the principle of equal opportunities and equal treatment for all employees, regardless of sex, race, religion or belief, age, marriage or civil partnership, pregnancy/maternity, sexual orientation, gender reassignment or disability. It has a clear policy of paying employees equally for the same or equivalent work, regardless of their sex (or any other characteristic set out above). As such, it:

- Carries out pay and benefits audits at regular intervals;
- Evaluates job roles and pay grades as necessary to ensure a fair structure.

Sims Metal Management is therefore confident that its gender pay gap does not stem from paying men and women differently for the same or equivalent work. Rather its gender pay gap is the result of the roles in which men and women work within the organisation and the salaries that these roles attract.

Across the UK economy as a whole, men are more likely than women to be in senior roles (especially very senior roles at the top of organisations), while women are more likely than men to be in front-line roles at the lower end of the organisation. In addition, men are more likely to be in technical and IT-related roles, which attract higher rates of pay than other roles at similar levels of seniority. Women are also more likely than men to have had breaks from work that have affected their career progression, for example to bring up children. They are also more likely to work part time, and many of the jobs that are available across the UK on a part-time basis are relatively low paid.

This pattern from the UK economy as a whole is reflected in the make-up of Sims Metal Management's workforce, many of the roles in our lower quartile have been made up of manual labour, working outdoors, in sometimes harsh environments. Whilst Sims Metal Management consistently approached recruitment from an equal opportunities perspective, at times it may be difficult to attract female applicants.

Since the report published in 2018, Sims has committed to focusing activities on our diversity and equality statistics. Sims has created Global and local focus groups on this particular subject. We have already looked at our advertising wording, looking particularly to use less male dominated vocabulary and this continues to be an area of focus, with specific actions being identified for the coming 12 months.

How does Sims Metal Management's gender pay gap compare with that of other organisations?

The vast majority of organisations have a gender pay gap, and we are pleased to be able to say that Sims Metal Management's gap compares favourably with that of other organisations, including those within our industry.

The overall gender pay gap for the whole economy increased from 17.4% to 17.9% in the year between April 2017 and April 2018. However, in comparison Sims Metal Management's Gender Pay Gap decreased from 2.86% to 2.38%. This is an example of where our focus on equity and diversity is having a positive effect on the UK element of our business.

In addition it should be noted that the bonus scheme operated in the last tax year (16-17) were hourly paid bonus programmes for roles, which are predominantly completed by men. The Company does operate a Short Term Incentive Bonus programme middle and senior managers. However, the financial targets for the business were not met in the Fiscal Year of 2017 and therefore no payments were made under this programme. However, in the Fiscal Year of 2018 the financial targets were met and therefore bonus payments were generated, this can be seen in the data captured.

What is Sims Metal Management doing to address its gender pay gap?

Sims is committed to doing everything that it can to reduce the gap further. Sims Metal Management also recognises that its scope to act is limited in some areas - it has, for example, no direct control over the subjects that individuals choose to study or the career choices that they make.

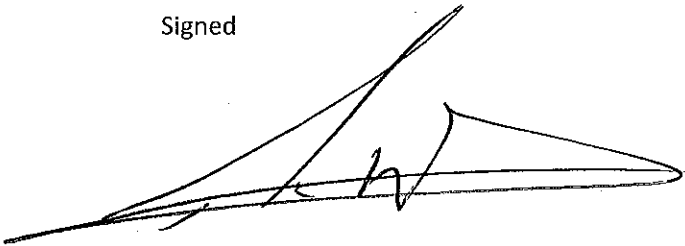
In order to attempt to raise awareness of the industry, Sims joined in with a Trailblazer and has now successfully launched a Industry specific General Operative Apprenticeship, this has created an entry-level qualification, which will be marketed to all genders and aim to pro-actively increase the diversity of our business and has created a study/career choice within our industry.

On review of the data there has also been a global working group launched to promote diversity within Sims Metal Management. These groups are looking at factors that could encourage a more diverse workforce. Current areas of delivery are:

- Site investments, ensuring that the facilities are clean, warm and have basic Male and Female facilities available.
- Marketing and Brand – Focus on wording and advertising to appeal to all and not be gender bias
- Policies – review of our Maternity policy in order to attract more female employees, with employee benefits in Maternity and Paternity being increased Globally.

Furthermore, in order to engage and identify barriers and drivers for women currently working within our company and industry, we have facilitated a Women Working in Sims event. This event was held in a central location, with 43 women from across the business attending. There were focus groups, guest speakers and an opportunity for our female employees to feedback on their experiences within the business. This event was launched by the Managing Director, who once again committed to this as being a focus area for our UK Metals Business. It also enabled us to highlight the importance of our pursuit of continuously improving what we do through creating and sustaining an environment, where diversity of perspectives, experiences and skills exist and are also encouraged and valued as critical to our success. I, Paul Wright, Managing Director UK Metals, confirm that the information in this statement is accurate.

Signed

A handwritten signature in black ink, appearing to be 'P. Wright', written over a horizontal line.

Paul Wright

Managing Director – UK Metals

21 March 2019