

SAFETY, HEALTH, ENVIRONMENT, COMMUNITY & SUSTAINABILITY (SHECS)

BIODIVERSITY POLICY

Revision Date: January 2016 Page 1 of 1

OUR COMMITMENT

At Sims Metal Management, we aim to be the world's safest and most responsible recycling company. Because our core business is converting waste from our suppliers into materials used in tomorrow's products, we have an important role to play in an increasingly resource-constrained world. We aim to be a leader in the emerging circular economy.

Our corporate commitment to Safety, Health, Environment, Community and Sustainability (SHECS) is described in the "Sims Metal Management Code of Conduct" and the following two documents:

- "Board of Directors' Commitment to Safety, Health, Environment, Community and Sustainability" (2015)
- "Safety, Health, Environment, Community & Sustainability: Our Commitment" (2015)

This Biodiversity Policy is one of several documents that provide additional detail supporting our commitments. This policy should be understood together with the SMM Environment Policy and our Energy and Carbon Emissions Policy.

OUR POLICY

Sims Metal Management (SMM) recognizes the importance of preservation of habitats and ecosystems to ensure biological diversity for future generations. We recognize the management of biodiversity as fundamental to our public responsibilities. As a minimum, we will comply with all applicable biodiversity laws, regulations, licensing conditions and standards of the countries and communities in which we operate. We will strive to achieve levels of performance which exceed basic compliance.

Operations: We will strive to manage all our sites, operations and activities so as to ensure the effective management and discharge of surface water to reduce impact on local ecosystems. We will ensure that no operational activities are commenced without due consideration of their potential impact on biodiversity and appropriate mitigation measures employed.

Plans: We will ensure that new facilities are planned, assessed and operated so that they meet the applicable governmental biodiversity requirements. In addition, we will incorporate biodiversity into relevant business decision-making, including acquisition activities;

Outreach: As part of our commitment to transparency, we will evaluate and report on biodiversity where applicable and relevant. We will respect regional conservation strategies and work with local authorities regarding the protection of local areas wherever applicable.

OUR SUPPORT

We are committed to supporting the above through effective leadership, communication, management systems, training and accountability. Our senior executives will make employees and contractors aware of this policy, its impact on them and on the reputation of our business. We will share best practices and lessons learned with all facilities globally. This policy will be reviewed regularly in accordance with the Charter of the SHEC Committee of the SMM Board of Directors.