



COMMUNITY POLICY

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 Community Policy is one of several documents that provide additional detail supporting our commitments. This policy should be understood together with the SMM Code of Conduct and our Human Rights Policy.

OUR POLICY

Sims Metal Management (SMM) is committed to being a respected, responsible corporate citizen by working constructively with our communities and other stakeholders and engaging in the honest and ethical conduct of our business. We recognize our role and responsibilities in the communities in which we operate and are committed to conducting all business activities in a way which acts on those responsibilities and, wherever practicable, produces positive benefits for the community.

Courtesy and Respect: Each employee is a representative of SMM and as such accountable for his/her conduct and must act professionally, courteously and respectfully to all fellow employees, suppliers, contractors and visitors and members of the community at all times. As a minimum, we will comply with all applicable local laws, regulations and standards of the countries in which we operate, but will strive to achieve levels of performance which exceed basic compliance.

Stakeholder Engagement: We will engage regularly, openly and honestly with people affected by our operations, taking their views and concerns into account in decision making.

Product Awareness: We will engage with stakeholders involved through the lifecycle of our products, in order to promote the responsible use and management of those products.

Conflict Minerals: In 2013, the Company filed a Conflict Minerals Disclosure (Form SD) with the United States Securities and Exchange Commission. In that disclosure, the Company concluded that it did not have conflict minerals (3TG from the Covered Countries) in the products it sold during the period. Sims periodically revisits the infrequent occasions in which we may purchase metal-containing components other than from recycled or scrap sources regarding the potential applicability of the conflict mineral rule.

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.