



SAFETY AND HEALTH POLICY

OUR COMMITMENT

At Sims Metal Management, we aim to be the world’s safest and most responsible recycling company. 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 Safety and Health Policy is one of several documents that provide additional detail supporting our commitments.

OUR POLICY

We recognize that the safety of our employees, suppliers, contractors and visitors comes before all other considerations. We aim for a “zero harm” workplace. As a minimum, we will comply with all applicable occupational safety and health laws, regulations and standards in the jurisdictions in which we operate. We will strive to achieve levels of performance which exceed basic compliance.

Safe Place and System of Work: All injuries, illnesses and operational exposures associated with the workplace are preventable and can be safeguarded against. We will maintain sound general working conditions at all times through the provision of adequate, healthy and safe facilities and will provide appropriate support, including the use of external consultants as required, to ensure that the best safety and health practices exist in all our operations. In support of this company policy:

- SMM facility managers are accountable for maintaining safe and healthy working conditions.
- SMM’s line managers and supervisors must:
 - Ensure that a safe system of work exists and that risk assessments are implemented as required, when equipment is purchased or when jobs or processes significantly change;
 - Ensure that employees are trained and supported in the safe performance of their assigned tasks.
- Employees must:
 - Refuse to perform any task that cannot be performed safely;
 - Understand and comply with the letter and spirit of all safety and health policies, practices and procedures including the SMM Golden Rules;
 - Promptly report any observed unsafe act or condition, safety incident or breach of safety and health policies and procedures to his/her supervisor;
 - Support continuous improvement relating to safety and health; and
 - Be accountable for his/her safe conduct at all times with regard to themselves, fellow employees and members of the community.

In the unfortunate event of a workplace incident, we will actively engage in the rehabilitation, injury management, support and return to work of injured employees.

Continuous Improvement: We will seek continuous improvement in all safety and health aspects of our operations and will seek to eliminate the risk of injury through the integration of safety and health evaluations for all operational activities, supported by appropriate risk management principles and tools.

Consultation: Our managers will regularly consult on safety and health matters with employees, nominated or elected safety representatives or SHECS committee members.

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.