We at Sims Metal Management are proud of our role as stewards of our world’s limited resources for over 100 years. As a global leader of metals and electronics recycling we play an intrinsic role in the circular economy, by keeping resources in use as long as possible, extracting the maximum value from those resources while in use, and then recovering and regenerating products and materials at the end of their useful life. Our efforts contribute to the sustainable future of our world.

Our core businesses are:

• **Metals Recycling** – As the world’s leading publicly listed metals recycler, Sims buys and sells ferrous and non-ferrous recycled metals.

• **Electronics Recycling** (Sims Recycling Solutions) takes in discarded electronics and refurbishes, repairs, remanufactures and restores the materials for continued useful life.

• **Municipal Recycling** – Sims Municipal Recycling receives household recyclables from municipalities such as New York City and Chicago.

• **Renewable Energy Generation** - Sims’ joint venture LMS is a leading renewable energy and carbon abatement company, offering energy recovery from landfill gas and solar energy collection panels. The figure below depicts Sims’ businesses and their place in the circular economy.

Over the past year, our investors have increasingly asked about Sims’ posture and performance in the areas of environmental, social and corporate governance (ESG). As the graphic below illustrates, Sims is very much aligned with the circular economy – where materials remain in useful life for as long as possible. We discuss this in detail later in this report.

In June 2017, the G20 Financial Stability Board’s Task Force on Climate-Related Financial Disclosures (TCFD) released its final recommendations on the disclosure of the risks and opportunities as we transition into a lower carbon economy. We have organized this report around the four main categories of the TCFD recommendations (Governance, Strategy, Risk Management, and Metrics).

Sims is a long-standing supporter of standardized sustainability reporting guidelines in general, and of the Global Reporting Initiative (GRI) in particular. We include a table inside the back cover of this report cross-referencing key GRI indicators aligned with our Materiality Assessment, showing where in this report those topics are discussed.
About This Report

Our 2018 Sustainability Report shares our progress in shaping a more sustainable world. It discusses our contributions to the circular economy, as well as the work and projects we are pursuing to minimize the impact of our operations on the environment and society through responsible governance and leadership.

This Sustainability Report supplements the discussion of our environmental, social and governance activities integrated into our Annual Report of Financial Results for FY2018. It follows the guidelines established by the G20 Financial Stability Board’s Task Force on Climate-Related Financial Disclosures (TCFD) released in June 2017.

- Introduction
  - Sims’ Core Businesses
  - From the Chairman
  - From the CEO

- Governance
  - Sustainability Governance and Leadership
  - Sustainability Governance Organisation
  - Our Core Values
  - Global SHECS Policies
  - Driving SHECS Performance

- Strategy
  - Sims and the Circular Economy
  - UN Sustainable Development Goals
  - Innovation and Technology

- Risk Management
  - Enterprise Risk Management
  - Materiality Assessment
  - Climate Change Ramifications

- Metrics and Performance
  - Valuing Sims’ impact on Society
  - Performance Highlights
  - Health and Safety
  - Energy and Greenhouse Gas
  - Carbon Risk
  - CO₂ Emissions
  - Green Energy
  - Waste Management
  - Water Conservation
  - Community Engagement
  - Diversity and Talent

- External Recognition
- Our Path Forward
- Alignment with the Global Reporting Initiative
INTRODUCTION

Business has always been a rapidly changing landscape, and companies that adapt accordingly will succeed and flourish. In today’s world, with restricted resources, global interconnectivity and population pressures on energy, waste and water, the ability to do more with less has become an imperative for survival.

SIMS’ CORE BUSINESSES

Our core businesses contribute to the closed-loop circular flow of metals and electronics, creating new value from limited resources.

– Metals Recycling – Sims is the world’s leading publicly listed metals recycler, encompassing the buying, processing and selling of ferrous and non-ferrous recycled metals. 9.9 million metric tonnes of secondary metals were sold in FY18. The metals recycling activities are geographically diverse, with operations globally including the United States, Australia and the United Kingdom. Our network of processing facilities, many with deep-water port access, is supported by an extensive number of feeder yards from which to source recyclable ferrous and non-ferrous metals.

– Electronics Recycling – Global E-Recycling, which operates under the name Sims Recycling Solutions (SRS), is a global leader in electronics reuse and recycling across the globe. SRS provides disposition services for all types of retired electrical equipment to local, national and global customers in a wide variety of business sectors. 430,000 metric tonnes of electronics are recycled annually by our facilities. Our worldwide network of certified processing facilities, with no export mandates, reinforces our closed-loop approach to responsible electronic recycling.

– Municipal Recycling – In 2002, Sims expanded into curbside recycling in the United States, with the creation of Sims Municipal Recycling. The operation has grown to become a cornerstone of New York City’s recycling system. In total, the business processes and markets nearly 500,000 metric tonnes of municipal curbside material annually.

– Renewable Energy – In 2001, Sims entered the renewable energy market with a strategic investment in LMS Energy. That investment has grown into a 50% ownership of LMS, one of Australia’s premier landfill gas-to-energy and solar renewable energy companies that generates 395,000 megawatt hours of base-load renewable electricity annually. By capturing the landfill greenhouse gas emissions, LMS abates more than 3.3 million metric tonnes of carbon (CO2-e) each year and provides a local renewable energy source for the community.

The nature of our business, our global reach, our leadership and the commitment of our employees all point to a future of sustainable innovation and growth.

We transform society’s waste into valuable resources.
FROM THE CHAIRMAN

SUSTAINABILITY AND CORPORATE RESPONSIBILITY

“Our Company’s purpose...put our planet first. We are convinced that by so doing, Sims will continue to prosper for the benefit of its shareholders, employees, the communities in which we operate, our suppliers and our customers.”

Sims FY18 results bear testimony to our dedicated employees maintaining their commitment to continually improving our business processes, applying disciplined deployment of capital, and ensuring that service to our suppliers and customers remained at the highest standards; all the while working more safely than ever before in our Company’s 101 year history.

Reaching this milestone is no reason for our Company to be complacent about the future. Ensuring that we have the right foundations for continued prosperity is a priority for the Board and senior leadership team. Building on our history, we will continue to look at everything we do through the lens of our Company’s purpose which, put simply, is to put our planet first. We are convinced that by so doing, the Company will continue to prosper for the benefit of its shareholders, employees, the communities in which we operate, our suppliers and our customers. These groups are demanding in the way they interact with governments are becoming more demanding in the way they interact with stakeholders and regulators, and in particular ensuring that organisations accept more accountability for the way they interact with companies, not just in Australia, but in all the markets we serve.

The importance of strong corporate culture, and the role of boards in setting and monitoring culture, has never been in sharper focus than is the case today. The Hayne Royal Commission and the Australian Prudential Regulatory Authority review of the Commonwealth Bank have highlighted the importance of a board’s understanding of the cultural characteristics of their organisations, and in particular ensuring that company culture aligns with community expectations.

Sims operates in 18 countries and exports to customers in more than 50 countries.

Ensuring that our conduct in all jurisdictions aligns with the highest ethical standards is a key priority for the Board and senior leadership team. This includes protecting the environment, fostering diversity, actively being involved in our communities, and conducting our business so we can adapt to changing markets and expectations.

Safeguarding the environment in which we operate continues to be a measurable objective and our sustainability report sets out where we are on that journey. Climate presents both challenges and opportunities. In particular, as weather events become more intense, our facilities can be impacted. We are assessing the vulnerability of all our locations, while capital spending evaluations include an assessment of the potential for climate impact.

Growth in the ‘circular economy’ will continue to provide more opportunities for Sims to deploy capital so as to provide more attractive solutions for our customers. As awareness of our position within this ‘circular economy’ becomes better articulated, and more widely known, we will strive to attract talent to harness this potential. These more sophisticated recycling solutions will create additional opportunities, but it is also incumbent upon us to ensure there is minimal dislocation and disruption to our existing work force caused by technological advances.

Given the many countries and nations in which we operate and employ, our workforce is quite diverse. Moreover, the twelve members of our senior leadership team in themselves represent six different nationalities. Gender diversity within our workforce is an area of continuous focus, with women currently representing 20 per cent of our over 5,000 employees. We have worked hard to ensure our workplaces are more appealing for women. Our approach to hiring is fair; our policies and working environment result in all employees feeling they are welcomed, and our remuneration is equal. We are committed to ensuring there is no harassment in the workplace and that, as an organisation, we support our workforce throughout their careers at Sims.

Over the past twelve months, directors visited eight operating sites and witnessed first-hand our safety culture in action. Safety is not just about ticking the boxes, it is at the foundation of everything we do, and this philosophy has to be embedded throughout the organisation. We strive for zero harm to our employees and members of the public. Fiscal year 2018 was the safest year in our Company’s history in terms of both injury rates and severity of injuries. However, until we eliminate injuries altogether, the Board and management will continue to take initiatives to improve our performance.

On behalf of the entire Board, I would like to thank all of our employees for their efforts over the past year, as well as our suppliers and customers for their support and trust. Our aim is to build upon the momentum achieved across the Sims Group over the past several years.

Geoff Brunsdon
Chairman
Safety remains our number one priority, and our safety performance during fiscal year 2018 was a testament to that. It was our safest year on record. As we look toward the future, my goal is to ensure that we future-proof our business for even greater profitability for years to come. We are thinking differently, and our corporate strategy will reflect that by placing a greater emphasis on social responsibility and incorporating purpose-driven standards in our business practices. These changes will allow us to strengthen our brand, increase employee engagement and create an even bigger social impact.

Additionally, by establishing a shared social purpose and standards, we are able to create alignment among the various business units.

This team and I have invested a great deal of time in developing a clear operating philosophy that reflects who Sims is today and where we would like the Company to be in the future.

Alistair Field
Group CEO and Managing Director

One of the initiatives that we’ve introduced from the start of this fiscal year is that all capital expenditure approval requests in excess of $5 million need to take into account the potential impacts of climate change. This simple step means that we will instill an awareness of climate change across the business as a standard operating procedure and ensure that we are making conscious decisions in terms of allocating capital – but we can’t stop there. We need to continue improving our use of resources and participating in larger initiatives that will demonstrate our commitment to further sustainability.

We collaborated with two organizations that are leading the charge in getting people to think and act sustainably. Sims was the title sponsor for the first ever Global Recycling Day, an initiative created to help recognize and celebrate the importance of recycling in preserving our resources and securing the future of our planet. I was also invited to join the World Business Council on Sustainable Development (WBCSD), which is a global, CEO-led organization of more than 200 leading businesses, where I will have the opportunity to work with other leaders to accelerate the transition to a sustainable world.

As we look toward the future, my goal is to ensure that we future-proof our business for even greater profitability for years to come. We are thinking differently, and our corporate strategy will reflect that by placing a greater emphasis on social responsibility and incorporating purpose-driven standards in our business practices. These changes will allow us to strengthen our brand, increase employee engagement and create an even bigger social impact.

Similarly, sustainability is, and will continue to be, a cornerstone of our corporate strategy. Not only is it a guiding principle for our Company, but it is also at the heart of our business model. Our business was impacted by several climate-related incidents, including the worst drought on record in New South Wales and Hurricane Harvey in Houston. This year, we considered climate change risks and opportunities in our enterprise risk management process. This allows us to explore uncertainties and to understand business implications across possible future outcomes. We have not identified any issues that are likely to have a material impact on our profitability, and as a part of the risk management process, climate risks are continuously updated as they evolve.

Safety remains our number one priority, and our safety performance during fiscal year 2018 was a testament to that. It was our safest year on record, and we had an ambitious goal of zero-harm. We’ve made several cultural improvements throughout the Company to ensure a further reduction in safety infractions, but we still have room for improvement and will employ best practices across the region to ensure that we can meet our goal.

Similarly, sustainability is, and will continue to be, a cornerstone of our corporate strategy. Not only is it a guiding principle for our Company, but it is also at the heart of our business model. Our business was impacted by several climate-related incidents, including the worst drought on record in New South Wales and Hurricane Harvey in Houston. This year, we considered climate change risks and opportunities in our enterprise risk management process. This allows us to explore uncertainties and to understand business implications across possible future outcomes. We have not identified any issues that are likely to have a material impact on our profitability, and as a part of the risk management process, climate risks are continuously updated as they evolve.
Sustainability starts with active and engaged leadership and oversight.
SUSTAINABILITY GOVERNANCE ORGANIZATION

The key elements of our sustainability governance structure are depicted in the figure below. In addition to the more formal SHECS Committee and Executive Leadership Team (ELT) meetings, this reporting structure provides extensive informal communication.
OUR CORE VALUES

At Sims we keep things simple. Our sustainability governance is built on a clear and direct reporting structure that communicates Company policies and guidance from the boardroom to the shop floor. Every employee understands the importance of SHECS.

The foundation of Sim’s culture is its core values of Safety, Integrity, Respect, Transparency, Excellence, and Social Responsibility. Investment in the Company’s core values binds employees together across regions and responsibilities, and helps the Company strive towards achieving its goals. They set the standard for Sims interactions with employees, customers, communities and other stakeholders.

Safety remains our number 1 priority. Safety is not just about ticking the boxes; it is at the foundation of everything we do, and this philosophy must be embedded throughout the organisation. We strive for zero harm to our employees and members of the public. Fiscal year 2018 was the safest year in our Company’s history in terms of both injury rates and severity of injuries. We have worked hard to develop a culture of safety throughout our organization globally and we will continue and maintain our focus on safety. The board, management and employees are fully engaged in, and committed to, making Sims a safe place to work - we believe that even one incident is one too many.

Integrity and Respect underly everything Sims does. The Company’s personnel know that they are expected to act with integrity and to respect those around them at all times. The goal is for employees to be able to go home every day proud of their achievements, and secure in the knowledge that their contributions and ideas are valued.

Transparency and Excellence in all endeavors enable Sims to leverage its best talent and ideas across the Company. Employees throughout the organization champion a culture where information is openly shared and best practices are driven across all of the Company’s businesses.

Social Responsibility starts at the top, as evidenced by the Board signing the Board of Directors’ Commitment to SHECS. This leadership support is critical to the welfare of the Company’s people and the communities in which we operate, and is essential to the long-term growth of the Company’s business.

Both the Board of Directors and CEO have made powerful pledges to Safety, Heath, Environment, Community, and Sustainability with personally signed commitment letters. These can be found at: https://www.simm.com/investors/governance/

These commitments are imbedded in our global SHECS policies.

Our core values drive our commitment to sustainability.
Environmental concerns (other than energy, carbon emissions and biodiversity) such as the sustainable use of resources; reducing the impact of modern life on water, air, and soil; and minimizing waste must be incorporated into day-to-day operations in order to protect the natural environment, and Sims is committed to doing so.

Human Rights must be respected, promoted and upheld by Sims’ global operations. Sims recognizes its role and responsibilities within its sphere of influence and endeavours to avoid being complicit in or encouraging any activities that might result in human rights abuses. These global SHECS policies are translated into daily operational activities through the application of our Global SHECS Standard Operating Policies. These set the minimum standards by which we run our facilities. Our SHECS management system enables a universal approach across our sites and drives our SHECS performance. These policies can be found at www.simsmm.com/investors/governance

Safety and Health of our personnel and anyone visiting our facilities is our primary concern. We aim for a zero-harm workplace.

Energy and Carbon Emissions. Sims appreciates the need to reduce the energy usage and carbon footprint of its day-to-day operations, and strives to do so.

Biodiversity is key to a healthy environment, and Sims recognizes the importance of preserving habitats and ecosystems to ensure biological diversity for future generations.

Community is more than just the locations in which we operate, it includes also our stakeholders and the world at large. Sims is committed to being a respected and responsible corporate citizen by engaging in the honest and ethical conduct of our business.

Sims’ greatest assurance that SHECS principles, and the sustainability mindset they encompass, have been embodied at the operational level is gained through its facility managers. It is the responsibility of our facility managers to instill their personnel with a commitment to everything SHECS. Additionally, every manager must formally commit and confirm that their operations comply with Company standards. This process includes identifying areas that require improvement, producing detailed action plans that aim to bring the sites into conformance, and following-up until all issues have been addressed. Internal Audit’s assurance is the last, but not the least, piece in the governance process. It assesses conformance at the facility level with our global SHECS requirements and standard operating procedures. Internal Audit utilizes the expertise of independent SHECS leaders in these engagements, who, in turn, gain exposure to best practices across regions and businesses.
SIMS MM.COM

STRATEGY

SIMS AND THE CIRCULAR ECONOMY

The circular economy, as opposed to the traditional linear economy of “make, use, dispose”, is driven by keeping resources in use for as long as possible, extracting the maximum value from those resources while in use, and then recovering and regenerating products and materials at the end of their useful life. Recycling is an intrinsic part of the circular economy. Sims is committed to helping to propel our world from the linear to the circular, which will reduce pressure on a planet dealing with climate change, growing populations, and finite natural resources. The circular economy is our best hope for the future, and Sims is proud to be a leader in it.

We are proud of our track record of sustainability leadership and we strive to continually raise the bar to do even better. We leverage our expertise in innovation and technology to enhance our contribution to the circular economy.

Our data demonstrates consistent improvements compared to our baseline from 2014, not only in safety, but also in our key environment impact areas: waste, water, and use of renewable energy.

SIMS AND THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

The United Nations Sustainable Development Goals (SDGs) provide a roadmap for current and future generations worldwide. As a global company, Sims’ core businesses allows us to make a wide-ranging contribution to the achievement of the 17 SDGs. We will continue to raise awareness of the SDGs in our business operations and ensure our business activities contribute to a healthy society and sustainable planet.

By aligning our business strategies with the SDGs, not only can we maintain and strengthen our license to operate, but we can also create value for society and improve the quality of life globally.
INNOVATION AND TECHNOLOGY

– Maximizing Circular Flows.  
As a metals recycling company, shipping measurable amounts of metallic material to landfills for disposal represents an obvious opportunity to reduce waste generation and waste-related costs. Sims has dedicated a great deal of resources, R&D, and time to identifying the best practices and technologies for extracting ever more metal from our waste streams.

We also work to provide innovative recycling solutions to our customers. In conjunction with our plastic resin partner, we are producing a world class recycled content plastic supply for OEMs to engage in the full circular economy, manufacturing parts from recycling plastic to produce new equipment.

– Implementing New Technologies For Material Recovery.  
Sims continues to invest in new technologies which create greater yields and purer products from our material recovery plants. This increases and diversifies the products Sims offers. This diversity is important to Sims in the context of growth and also in managing changing customer requirements.

Extracting more metal from our waste streams.

– Continuous Improvement of Operations.  
The Continuous Improvement Programme at Sims is an important driver to deliver process improvement and business excellence. We are working across all business units to redesign workflows so we can deliver our products and services faster, more efficiently and with higher quality. Through this programme, we’ve been able to leverage Lean Six Sigma techniques to create efficiencies from the yard to the corporate office. The use of the DMAIC (define, measure, analyze, improve and control) process has allowed us to ensure that the improvements we made are sustainable and that our processes are fit for purpose.

THE CLOSED-LOOP
At Sims, our view of risk management starts at a global strategic level, and then drills down to concrete risks that could impact specific parts of our operations. At a global level, we focused on the World Economic Forum’s Global Risk Review. In particular, we noted that many of the top risks in that report related directly or indirectly to climate change.

Sims’ Enterprise Risk Management process addresses risks and opportunities that could impact the Company’s strategic objectives. Sims adopted an Enterprise Risk Management framework and process to facilitate the identification, management and reporting of key risks and opportunities. Our risk management framework is an enabling process that is formalized and understood across Sims.

Sims’ Enterprise Risk Management process addresses risks and opportunities that could impact the Company’s strategic objectives. Sims adopted an Enterprise Risk Management framework and process to facilitate the identification, management and reporting of key risks and opportunities. Our risk management framework is an enabling process that is formalized and understood across Sims.

It gives ownership of the identification and management of risk to business units and is supported and reinforced through risk discussions and appropriate actions at the Group and Board level. As a part of this process, we analyze market, industry information as well as global risk trends to assess current and emerging risks and opportunities facing the Company. Risk mitigation plans are developed and actions are taken to address any risks beyond Sims’ tolerance level.

We believe that effective identification and management of our risks and opportunities is key to supporting the achievement of Sims’ strategy and related objectives.

**KEY ENTERPRISE RISKS**

<table>
<thead>
<tr>
<th>Risk Likelihood</th>
<th>Low</th>
<th>Moderate</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk Impact</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Legend:
- IT risks
- HR risks
- SHECS/ Climate Change risks
- Finance risks
- Market / Trading risks
- Regulatory risks

- **Very Likely**
  - Failure to find new or keep customers
  - Insufficient IT disaster recovery plans
  - Insufficient IT disaster recovery plans

- **Probable**
  - Cyber-security threats and weakness in monitoring
  - Lack of right to operate
  - Non-compliance - Cost of compliance with emerging laws (environment, privacy)

- **Possible**
  - Failing to attract skilled talent
  - Inappropriate allocation of Capital funding
  - Workplace fatality

- **Not Likely**
  - Climate Change Impact on Ops
  - Injuries and damage due to extreme weather events
  - Inappropriate allocation of Capital funding

- IT impacts
- HR impacts
- SHECS/ Climate Change impacts
- Finance impacts
- Market / Trading impacts
- Regulatory impacts

**Legend:**
- IT risks
- HR risks
- SHECS/ Climate Change risks
- Finance risks
- Market / Trading risks
- Regulatory risks

- Insufficient IT disaster recovery plans
- Poor IT infrastructure
- Climate Change Impact on Ops
- Loss of right to operate
- Loss of Non-Fe outlet
- Failure to find new or lose customers
- Competition - New Entrants
- Injuries and damage due to extreme weather events
- Failure to attract skilled talent
- Inappropriate allocation of Capital funding
- Workplace fatality
- Non-compliance - Cost of compliance with emerging laws (environment, privacy)

**Legend:**
- IT impacts
- HR impacts
- SHECS/ Climate Change impacts
- Finance impacts
- Market / Trading impacts
- Regulatory impacts

- Insufficient IT disaster recovery plans
- Poor IT infrastructure
- Climate Change Impact on Ops
- Loss of right to operate
- Loss of Non-Fe outlet
- Failure to find new or lose customers
- Competition - New Entrants
- Injuries and damage due to extreme weather events
- Failure to attract skilled talent
- Inappropriate allocation of Capital funding
- Workplace fatality
- Non-compliance - Cost of compliance with emerging laws (environment, privacy)
MATERIALITY ASSESSMENT

The enterprise risk management process was supplemented by a materiality assessment to identify the Environmental, Social and Governance (ESG) issues relevant to Sims’ business and its stakeholders’ interests. The process involved a combination of peer benchmarking, and engaging internal and external stakeholders. The chart below depicts the most important issues noted from the materiality assessment performed.

THE FIGURE BELOW DEPICTS SIMS’ MATERIALITY ASSESSMENT – 25 MOST IMPORTANT ISSUES

CLIMATE CHANGE RAMIFICATIONS

The Company recognizes that climate change could have meaningful impacts on the financial performance of the Group over time and has begun the process of identifying key risks and, where possible, commenced action to mitigate their impact.

The key risks identified centre around the potential for increased, and more extreme, weather events impacting:

- Health and safety issues for employees operating on sites [extreme temperatures];
- Inability to maintain standard operational hours at facilities [extreme temperatures];
- Docks, material handling and the transportation of products [intense rain and wind];
- Access to reliable supply of electricity [extended heat waves]; and
- Reliable operation of critical data storage sites [flooding, extended heat waves].

These risks are currently not expected to have a material impact on the Company’s financial performance. However, effective from July 2018, all capex approvals over a $5 million threshold value require consideration of the impact of climate change as a standard practice.

Bubble size indicates how well Sims’ programs control the risk (bigger = better controlled)
Sims aims to be net positive – to have an enterprise-wide positive impact on society. Based on our analyses over the years, our circular economy business model allows us to do just that.

During FY18, we contracted with Lifecycles, an Australian firm specializing in life cycle analysis, to assess Sims’ core business model in comparison to the production of steel from virgin materials. The high-level model developed by Lifecycles, using average global data from ecoinvent, suggests that “the collection, sorting, pre-processing and smelting of steel scrap results in greenhouse gas emissions that are 77% lower than the greenhouse gas emissions associated with producing virgin steel from a blast furnace.”

We are proud to operate a business that reduces the use of natural resources.

**FY18 PERFORMANCE HIGHLIGHTS**

Our performance data demonstrates consistent improvements compared to our baseline from 2014, not only in safety, but also in our key environmental impact areas: energy, waste and water. While we are proud of our track record of sustainability leadership, we are continually pushing for improvement.

- Total recordable injury frequency rate (TRIFR) decreased 55%
- Electricity use decreased 19%
- Fleet fuel consumption decreased 14%
- Automotive shredder waste (ASR) decreased 18%
- Water use decreased 24%
- Renewable energy grew to 4%
- CO₂ emissions decreased 8%

*Values are absolute. Figures represent comparison of FY18 to FY14.
Employee health and safety is our highest priority. Sims is on a journey to become world-class in health and safety. We have worked hard to develop a culture where employees are fully engaged in, and committed to, making Sims a safer place to work. We continue to reduce the number of injured employees – even one incident is one too many. During FY18, more than 80% of Sims’ locations were free of reportable injuries for more than a year.

According to data from the 2016 United States Bureau of Labor Statistics, the average injury/illness recordable rate [per 200,000 hours worked] is 4.2 for metal recycling. By comparison, Sims’ injury and illness rate is 1.2.

Over the past five years, we have reduced our recordable injuries by 55 percent; our injuries resulting in lost work days by 54 percent, and our performance continues to improve. Our goal is zero injuries – on and off the job – and we will never be satisfied until we achieve that.

The nature of metal recycling involves large machinery and heavy objects in close proximity of workers and contractors. No work commences until a task has been thoroughly risk assessed and fully understood by all personnel involved. Should a near miss or unsafe situation occur despite these efforts, the activity immediately stops until the root cause is understood and the issue addressed. Our goal is simple: zero-harm; no one gets hurt, and you go home as you arrive. We utilize a number of metrics, such as the Lost Time Injury Frequency Rate (LTIFR), Medically Treated Injury Rate (MTIFR), Restricted Duty Cases (DART), and the Total Recordable Injury Frequency Rate (TRIFR).

We have set aggressive corporate goals to achieve a TRIFR of less than 1.0 and an LTIFR of under 0.20 by the year 2020. While we recognize these goals as being world-class benchmarks, we are not solely reliant upon them to measure our safety performance and culture.

As depicted in the injury rate trend charts on the following page, our efforts are showing results. Over the last 10 years, there has been a significant reduction in both recordable and lost time injuries. In FY18, our LTIFR [# of LTIs x 200,000/ exposed man-hours] was 0.25 compared to 0.27 in FY17, representing an eight percent reduction in Lost Time Injuries. Our MTIFR was down also and, overall, our Recordable Injury Frequency Rate was down from 1.3 in FY17 to 1.2 in FY18.

During FY18, Sims implemented a number of global safety initiatives aimed at achieving world-class safety performance. Some recent highlights include:

**Safety Leadership Certification Programme.** Assuring our management team is well versed in all aspects of safety, we continued with our Safety Leadership Certification training programme in FY18, requiring managers, supervisors and leads to successfully complete a three-day classroom and in-field practical certification programme.

**Education:** Education and employee engagement remain an important cornerstone of our safety culture. Monthly videos, with training packages and self-audit protocols, were distributed to Operations Managers. Videos cover many areas of safety on the job and in the home, and topics have included confined space, machine guarding, fall prevention, hot work, and mobile equipment. In addition to these global safety initiatives, each operating region undertook a number of local safety initiatives focused around monthly training topics.

**Significant injury and incident prevention.** Sims tracks injuries and incidents including first aid, near misses, property damage, motor vehicle incidents, etc., through a global safety incident reporting tool called VelocityEHS. During FY18, Sims recorded a total of 1,677 incidents, 1,162 near misses and 6,676 hazard identifications. Our SHECS organization analyzes the data to understand how well our systems are working, maps early trends, and ultimately gets a better understanding of our key safety risks. In FY18, 7% of all incidents and near misses had the potential to have resulted in a serious incident or fatality. This is down from the 9% identified in FY17.

**Risk Assessments.** We implemented a global platform for recording and tracking Risk Assessments. The platform allows sharing of information and the ability to track risk registers throughout the organization. In FY18, Sims focused on implementing best practice risk control measures on machine guarding across all its major operations.

This year was the safest year in Sims’ history.
Sims’ 2020 goals are based on the 200,000/man-hours calculation shown above.
**ENERGY AND GREENHOUSE GAS**

In 2009, Sims set the target to reduce its Scope 1 and 2 carbon emissions by 15%, and achieved that in 2012. In 2015 Sims established new targets to reduce carbon emissions by an additional 10% by 2020 with a 2014 baseline.

Fuel and Electricity

Total energy use for the Group in FY18 was 1,935,846 gigajoules (GJ), an increase of three percent from FY17. The major reason for this trend was an increase in operational activity, including additional processes to reduce waste streams.

Fuel (diesel used for transport and mobile equipment) was the major component at 1,139,890 GJ (58.9%), followed by electricity - used to power our shredder motors - at 624,750 GJ (32.3%), pipeline natural gas – used for heating – at 70,992 GJ (3.7%), with petrol and LPG following at 18,097 GJ (<1%). The remaining source of power came from renewable energies at 82,117 GJ, representing over 4% of our total energy use.

As part of our 2020 targets, we aim for a five percent consumption of our energy to be from renewable resources, using a 2014 baseline.

During the period FY14–FY18, we reduced electricity consumption by 19%, or 170,133 GJ.

---

**ELECTRICITY CONSUMPTION ABSOLUTE (GJ IN 100 THOUSANDS)**

<table>
<thead>
<tr>
<th></th>
<th>FY11</th>
<th>FY12</th>
<th>FY13</th>
<th>FY14</th>
<th>FY15</th>
<th>FY16</th>
<th>FY17</th>
<th>FY18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>1053</td>
<td>950</td>
<td>923</td>
<td>877</td>
<td>791</td>
<td>637</td>
<td>666</td>
<td>707</td>
</tr>
</tbody>
</table>

* -19% FY14–FY18

---

**FUEL CONSUMPTION ABSOLUTE (GJ IN MILLIONS)**

<table>
<thead>
<tr>
<th></th>
<th>FY11</th>
<th>FY12</th>
<th>FY13</th>
<th>FY14</th>
<th>FY15</th>
<th>FY16</th>
<th>FY17</th>
<th>FY18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>1,861.52</td>
<td>1,524.47</td>
<td>1,440.34</td>
<td>1,436.20</td>
<td>1,282.05</td>
<td>1,073.57</td>
<td>1,162.13</td>
<td></td>
</tr>
</tbody>
</table>

* -14% FY14–FY18 % Change

---

**ELECTRICITY CONSUMPTION NORMALISED (GJ/MT)**

<table>
<thead>
<tr>
<th></th>
<th>FY11</th>
<th>FY12</th>
<th>FY13</th>
<th>FY14</th>
<th>FY15</th>
<th>FY16</th>
<th>FY17</th>
<th>FY18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>72.38</td>
<td>65.33</td>
<td>69.87</td>
<td>69.85</td>
<td>72.31</td>
<td>69.43</td>
<td>72.60</td>
<td>70.91</td>
</tr>
</tbody>
</table>

* -10% 2020 Goal 2%* FY14–FY18

---

**FUEL CONSUMPTION NORMALISED (GJ/MT)**

<table>
<thead>
<tr>
<th></th>
<th>FY11</th>
<th>FY12</th>
<th>FY13</th>
<th>FY14</th>
<th>FY15</th>
<th>FY16</th>
<th>FY17</th>
<th>FY18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>128.00</td>
<td>104.11</td>
<td>111.07</td>
<td>111.07</td>
<td>128.00</td>
<td>114.14</td>
<td>117.07</td>
<td>116.07</td>
</tr>
</tbody>
</table>

* -10% 2020 Goal 8.6% FY14–FY18

---

*Increase from FY14–FY18 is based on equivalent energy sources. The FY14 numbers did not include renewable energy or pipeline natural gas.
ENERGY AND GREENHOUSE GAS

CO₂ EMISSIONS

Total Group CO₂ emissions (CO₂-e) for FY18 were 223.7 metric tonnes (MT). However this number includes CO₂-e from renewable energy sources and liquified natural gas that were not included in prior year numbers. The net FY18 increase was 27% over FY17, which was in part also due to a production volume increase of 13%, plus the addition of secondary material recovery processes designed to capture valuable commodities out of the waste streams. This is the circular economy tradeoff: the need to use increased electricity in order to capture more value from the waste streams.

GREEN ENERGY

LMS Energy Pty Ltd, the renewable energy company of which Sims owns 50%, entered its 22nd year of business in FY18. LMS is a national leader in landfill gas to renewable energy and an innovator in solar on landfill technology. LMS once again achieved record results in FY18. Operating 21 renewable power generation projects across Australia, a record of 395,000 megawatt hours of renewable energy was generated by LMS in FY18. This resulted in the creation of nearly 395,000 Large-scale Generation Certificates (LGCs). Today, LMS remains the largest bioenergy generator of LGCs in Australia. With 41 carbon abatement projects accredited under the Emission Reduction Fund, LMS has also been issued with more than 50% of all Australian Carbon Credit Units under the landfill gas methodologies. In FY18, LMS achieved an estimated 3.3 million metric tonnes (CO₂-e) of carbon abatement across all of its activities.

FY18 saw LMS’ fully owned subsidiary company Joule Energy commission the Northern Adelaide Waste Management Authority (NAWMA) solar generation project adjacent to the landfill. This project is the first in Australia to combine base-load landfill gas and solar, and solar alone has successfully generated over 1,000 MWh’s. Joule Energy has also secured the solar rights for three new projects in South Australia, Queensland and New South Wales.

CARBON RISK

The energy the Company uses to collect, process and distribute its products gives rise to carbon emissions. These emissions are known as Scope 1 emissions when they are generated directly by our equipment, such as trucks and mobile equipment. When the emissions are the result of externally provided power usage, such as electricity, they are referred to as Scope 2 emissions.

The Company’s approach to managing energy and related carbon emissions is detailed in its Corporate Environmental and Energy Policies, available on the Company’s website. As a participant in the Carbon Disclosure Project (CDP) since 2006, and the Dow Jones Sustainability Index since 2008, as well as several others, the Company is committed to its carbon emissions.

CO₂ EMISSIONS (MT)

(000MT) -8% FY14–FY18

<table>
<thead>
<tr>
<th>Year</th>
<th>Scope 1</th>
<th>Scope 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY11</td>
<td>157.4</td>
<td>149.9</td>
</tr>
<tr>
<td>FY12</td>
<td>138.5</td>
<td>117.8</td>
</tr>
<tr>
<td>FY13</td>
<td>142.5</td>
<td>111.1</td>
</tr>
<tr>
<td>FY14</td>
<td>130.0</td>
<td>106.9</td>
</tr>
<tr>
<td>FY15</td>
<td>120.8</td>
<td>105.2</td>
</tr>
<tr>
<td>FY16</td>
<td>109.4</td>
<td>82.2</td>
</tr>
<tr>
<td>FY17</td>
<td>109.9</td>
<td>87.3</td>
</tr>
<tr>
<td>FY18</td>
<td>143.5</td>
<td>85.2</td>
</tr>
</tbody>
</table>

Renewable energy grew to 4% of total energy use.
WASTE MANAGEMENT

Automotive Shredder Residue (ASR) Waste

ASR waste is an inherent part of the products we purchase for recycling. Volumes of non-recoverable materials are expensive to process, dispose of, and strictly controlled through quality control mechanisms, as well as our purchasing structure on incoming materials.

During FY18, the Company generated, at a global level, 1,052,349 metric tonnes of waste, which was a 4% increase over FY17. The significant contributor to this change was a 13% increase in production volume. Waste was minimized by focusing on purchasing materials with less inherent waste and increased ability to separate materials for beneficial uses.

As part of our 2020 targets, we aim to reduce waste intensity by 10% against the FY14 baseline.

Our year-to-date progress (from FY14) is that we have decreased waste by 34%. This is due to an increased focus on extracting additional commodities, moisture content monitoring, and smart watering systems.

*FY17 values have changed from the prior year’s Sustainability Report because they did not include all sites. The new values represent all of Sims.*
WATER CONSERVATION

Sims continues to use a very small amount of water, with only 540 megaliters (540,000 cubic meters) consumed globally. This represents an increase of 8.4% when compared to FY17, and is due to an increase in production volume. Some of our water reduction initiatives included: high-pressure water atomizers for dust control, smart water and foam systems for shredder dust plus temperature control, as well as better utilization of on-site captured run-off water.

From FY14 to FY18, Sims reduced water consumption by 24%, saving 170 megaliters (170,000 cubic meters).

As part of our 2020 targets, our goal is to reduce water intensity by 10% on a FY14 baseline. To date, we have achieved a five percent reduction in water intensity.
COMMUNITY ENGAGEMENT

Our operations bring economic benefits to the communities where we work by employing people, buying services and products, and paying taxes. Our focus is to deal openly and transparently with our host communities and work with anyone who is impacted by our operations. We want to be a trusted partner to all affected communities throughout the life cycle of our operations.

In FY18, Sims engaged in more than 270 community projects and sponsorships around the globe. Sims employees dedicated countless hours in support of causes they care about. We encourage our employees to volunteer and give hands-on support to sustainable projects, for which we provide financial assistance. Sims has enabled thousands of employees around the world to contribute to society in a meaningful way.

Below are highlights of some of these activities from FY18:

- In South Australia Sims worked with Keep SA Beautiful (Kesab) to support local environmental awareness and education by creating a web site for schools providing education on metal recycling processes, and a newsletter for community engagement on sustainability activities.
- In the U.S. Southwest Sims has an ongoing collaborative project with area groups organizing community engagement events and supporting a community vegetable garden.
- In the U.S. and Europe, Sims employees participated in Earth Day activities to educate the public on how they can incorporate recycling into their everyday lives.
- In Europe Sims’ and its employees have: donated refurbished laptops for community use, and supported local service organizations such as fire brigades, support lines, education centers, and programmes that provide opportunities and support for people with various disabilities.

The icons on this page correlate the number of community projects with the United Nations Sustainable Development Goals (SDGs). In the future, we plan to strengthen this alignment and continue to support and publicize the SDGs.
Sims promotes an inclusive culture through targeted recruitment and educational initiatives.

In FY18, Sims conducted a comprehensive review of its global, regional and local benefit programmes to ensure that Sims’ policies are compliant with its diversity standards. As a result, Sims adopted a more inclusive Parental Leave Policy that supports birth mothers, birth fathers and adoptive parents. Additionally, in this past year in North America, the Company launched Women Working @ Sims, a series of focus groups designed to help inform Sims’ approach to attracting and retaining qualified women in a competitive industry. The focus groups were expanded to all regions and provided attendees with a forum to share information on the female experience at Sims. This feedback is being used to inform the Company’s future diversity and inclusion tactics.

Sims continues to deliver global Diversity and inclusion training with an emphasis on local execution through its Respect & Inclusion @ Sims educational series. Thinking globally and acting locally allows Sims to set the tone for global governance, while adhering to the legislative guidelines and requirements in each country. The Company also tracks, monitors and measures diversity statistics for all applicants to determine future recruitment targets.

Sims is working to increase diversity across its business units globally. In the United Kingdom, Sims supported several recruiting events to attract qualified female candidates for its Trainee Management Programme, such as the British Forces Resettlement Services career fair. Currently, 33% of the programme’s participants are women, including Lisa Whitmore, a former Sergeant in the Royal Air Force. Lisa began working for Sims in March 2015 as a Transport Administrator, and 18 months later she entered the Trainee Management Programme. With an expected completion date of November 2018, Lisa credits the Trainee Management Programme for allowing her to transition to civilian life, while building the additional skills she needs to advance in her career at Sims.

In both Australia and the UK, Sims successfully complied with the Australian Workplace Gender Equality Agency and the UK Gender Pay Equity, reporting requirements respectively. Additionally, the Australasian region has been committed to attracting and developing talented candidates through its Cadet and Graduate Programme.

Since reinventing the programme in 2012, the Cadet and Graduate Programme has been a key initiative for engaging talented female employees. More than 36% of the candidates to date have been female, and 60% of those participants have been promoted to more senior positions.

The Australasian region is also investing in its current employees via the Emerging Leaders Programme. To date, several talented female employees have participated in this initiative and have received quality training, access to invaluable mentoring and the provision of tailored development plans to facilitate further growth and development. The Emerging Leaders Programme is scheduled to launch in the North America and UK regions in the coming fiscal year.
We are pleased to have recently received external recognition of our sustainability efforts by a growing number of leading independent organizations.

– **MSCI ESG Research Rating:** In July 2018, Sims earned the highest (AAA) rating from MSCI ESG Research LLC, and is the only company in the steel benchmark group with an ESG rating of AAA.

– **Dow Jones Sustainability Index:** The Company has participated in the prestigious Dow Jones Sustainability Index for nine consecutive years, where, since 2012, we have been an Index Component.

– **Carbon Disclosure Project:** The Company was one of the first to participate in the Carbon Disclosure Project (CDP) and 2018 marks Sims 13th year of participation in this leading carbon index.

– **The Conference Board:** In a comprehensive research report called ‘The Seven Pillars of Sustainability Leadership’, The Conference Board highlighted Sims’ Board of Directors’ Commitment Letter as a best-in-class example of Sustainability Leadership.


– **World Business Council on Sustainable Development:** In 2018, Sims CEO Alistair Field joined approximately 200 other global CEOs as a member of the WBCSD. This membership will enable Sims to work with other businesses to accelerate the transition to a sustainable world.

**In 2018, Sims joined the World Business Council for Sustainable Development**

**Joseph Cody Presented with ISRI’s Safe Driver of the Year Award**

*Sims Metal Management driver logged 44 years of safe driving*

At the Institute of Scrap Recycling Industries (ISRI) 2018 Convention, Joseph Cody of Sims Metal Management was presented with the ISRI’s Safe Driver of the Year Award for completing 44 verifiable years of safe driving.

“We at Sims Metal Management congratulate our long-time driver, Joseph Cody, for this prestigious award,” says Vispi Patel, General Manager of the West Region of Sims Metal Management. “Joseph exemplifies our commitment to safety. We are honored both by Joseph’s commitment to safety, demonstrated by his vigilance both on and off the road, and by his commitment to the company. Joseph not only is exemplary by his record of safe driving but also by his willingness to share what he has learned with others in his 44 years with the company.”

Cody is a third generation Sims Metal Management employee. His father was an account manager and his grandfather was a crane operator at the same location that he has worked at for 44 years in Sacramento, California.
**OUR PATH FORWARD**

2020 Goals

We established our first set of long-term sustainability goals in FY09. These were aggressive targets for energy, water and waste reduction and, as FY15 approached, we exceeded those goals. At that time, we set a new round of goals — based on a FY14 baseline for 2020. The focus of these goals is on the Company’s most material environmental and societal impacts: petroleum, electricity and water usage, and waste production. While we are pleased to report that we are on track to meet or exceed the majority of our 2020 sustainability goals, there are areas where we need to sharpen our focus. We are committed to do so.

The 2020 targets (normalised against production volume) include a 10% reduction in fuel consumption (Scope 1), a 10% reduction in consumption of electricity, and a move towards obtaining 5% of our energy use from renewable sources (Scope 2). Other targets include a 10% reduction in waste generation, and a 100% ban on the idling of mobile equipment in our yards. We will continue to report on our progress annually.

**The Path Forward**

Sustainability is, and will continue to be, a cornerstone of our corporate strategy. At Sims, sustainability and corporate responsibility are not activities we pursue separately from our core businesses; these concepts are fully integrated into our strategy and deeply ingrained in our culture.

Our core businesses have always supported the closed-loop circular flow of metals and electronics to continually extract value. We are universally recognized as an international leader in the transformation of discarded consumer products into valuable secondary resources. Thus, Sims has always been at the center of the circular economy – recovering and recycling products and materials to ensure maximum value and minimize waste. Growth in the circular economy will continue to provide opportunities for Sims to deploy capital so as to provide attractive solutions for our customers.

Every year we systematically review and assess risks to our business. This year we started evaluating the risks and opportunities climate change may have on our operations. We have implemented a process that requires all capital expenditures in excess of $5 million to take into consideration the impact of climate change.

As we approach 2020, we are pleased with the progress we have made on the sustainability goals we set in FY15. During the coming year, we will start to plan for a new set of long-term sustainability targets that will drive the Company’s progress in protecting the environment and the health and safety of employees, customers and the communities where we live and work. We know there is still much to be done.

In today’s world, with restricted resources, global interconnectivity and population pressures on energy, waste and water, the ability to do more with less has become an imperative for survival. More than ever, there is an urgent need to address global sustainability issues. Business as usual is not an option.

As the world comes to grips with climate change and a rapidly surging middle class, pressure on resources will continue. This presents an even stronger business case for recycling. The nature of our business, our global reach, our leadership and the commitment of our employees all point to a future of sustainable innovation and growth. Moving briskly toward embracing circular economy principles is the road to value creation for tomorrow’s leaner, fitter, more resilient, and transparent company. We are progressing on this journey with haste.

**SIMS 2020 SUSTAINABILITY GOALS**

**FLEET TRANSPORTATION**

- **No idling in yards:** 100%
- **Fleet petroleum:** 10% reduction

**ENERGY EFFICIENCY**

- **Electricity:** 10% reduction
- **Renewable energy:** 5% of total energy use

**WASTE AND RECYCLING**

- **ASR Waste to Landfill:** 10% reduction

**PEOPLE**

- **Total Recordable Injury Rate:** <1.0

**WATER USE**

- **10% reduction**

*FY14 Baseline and normalised by production volume*
Sims Metal Management is a strong advocate of sustainability reporting. We support the efforts of the Global Reporting Initiative and include the table below, which includes those GRI standards most directly aligned with our Materiality Assessment discussed earlier in this report.

### ALIGNMENT WITH THE GLOBAL REPORTING INITIATIVE

<table>
<thead>
<tr>
<th>GRI</th>
<th>GRI DESCRIPTION</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>101</td>
<td>Foundation</td>
<td>p.00, 02-12</td>
</tr>
<tr>
<td>102</td>
<td>General Disclosures</td>
<td>p.00, 02-12</td>
</tr>
<tr>
<td>103</td>
<td>Management Approach</td>
<td>p.00-12</td>
</tr>
<tr>
<td>200</td>
<td>Economic</td>
<td></td>
</tr>
<tr>
<td>201</td>
<td>Economic Performance</td>
<td>See Annual Report</td>
</tr>
<tr>
<td>202</td>
<td>Market Presence</td>
<td>See Annual Report</td>
</tr>
<tr>
<td>203</td>
<td>Indirect Economic Impacts</td>
<td>p.00, 11-12</td>
</tr>
<tr>
<td>204</td>
<td>Procurement Practices</td>
<td>N/A</td>
</tr>
<tr>
<td>205</td>
<td>Anti-corruption</td>
<td>See <a href="http://www.simmm.com/investors/governance">www.simmm.com/investors/governance</a></td>
</tr>
<tr>
<td>206</td>
<td>Anti-competitive Behavior</td>
<td>See <a href="http://www.simmm.com/investors/governance">www.simmm.com/investors/governance</a></td>
</tr>
<tr>
<td>300</td>
<td>Environmental</td>
<td></td>
</tr>
<tr>
<td>301</td>
<td>Materials</td>
<td>p.00, 02-10</td>
</tr>
<tr>
<td>302</td>
<td>Energy</td>
<td>p.16-17</td>
</tr>
<tr>
<td>303</td>
<td>Water and Effluents</td>
<td>p.19</td>
</tr>
<tr>
<td>304</td>
<td>Biodiversity</td>
<td>p.08: See <a href="http://www.simmm.com/investors/governance">www.simmm.com/investors/governance</a></td>
</tr>
<tr>
<td>305</td>
<td>Emissions</td>
<td>p.17</td>
</tr>
<tr>
<td>306</td>
<td>Effluents and Waste</td>
<td>p.18</td>
</tr>
<tr>
<td>307</td>
<td>Environmental Compliance</td>
<td>p.08: See <a href="http://www.simmm.com/investors/governance">www.simmm.com/investors/governance</a></td>
</tr>
<tr>
<td>308</td>
<td>Supplier Environmental Assessment</td>
<td>N/A</td>
</tr>
<tr>
<td>GRI</td>
<td>GRI DESCRIPTION</td>
<td>PAGE</td>
</tr>
<tr>
<td>------</td>
<td>------------------------------------------------------</td>
<td>-------------------------------------------</td>
</tr>
<tr>
<td>400</td>
<td>Social</td>
<td></td>
</tr>
<tr>
<td>401</td>
<td>Employment</td>
<td>p.00, 21</td>
</tr>
<tr>
<td>402</td>
<td>Labor/Management Relations</td>
<td>N/A</td>
</tr>
<tr>
<td>403</td>
<td>Occupational Health and Safety</td>
<td>p.14-15</td>
</tr>
<tr>
<td>404</td>
<td>Training and Education</td>
<td>p.21</td>
</tr>
<tr>
<td>405</td>
<td>Diversity and Equal Opportunity</td>
<td>p.21: See <a href="http://www.simsmm.com/investors/governance">www.simsmm.com/investors/governance</a></td>
</tr>
<tr>
<td>406</td>
<td>Non-discrimination</td>
<td>p.21: See <a href="http://www.simsmm.com/investors/governance">www.simsmm.com/investors/governance</a></td>
</tr>
<tr>
<td>407</td>
<td>Freedom of Association and Collective Bargaining</td>
<td>N/A</td>
</tr>
<tr>
<td>408</td>
<td>Child Labor</td>
<td>N/A</td>
</tr>
<tr>
<td>409</td>
<td>Forced or Compulsory Labor</td>
<td>N/A</td>
</tr>
<tr>
<td>410</td>
<td>Security Practices</td>
<td>N/A</td>
</tr>
<tr>
<td>411</td>
<td>Rights of Indigenous Peoples</td>
<td>N/A</td>
</tr>
<tr>
<td>412</td>
<td>Human Rights Assessment</td>
<td>p.08: See <a href="http://www.simsmm.com/investors/governance">www.simsmm.com/investors/governance</a></td>
</tr>
<tr>
<td>413</td>
<td>Local Communities</td>
<td>p.08, 20: See <a href="http://www.simsmm.com/investors/governance">www.simsmm.com/investors/governance</a></td>
</tr>
<tr>
<td>414</td>
<td>Supplier Social Assessment</td>
<td>N/A</td>
</tr>
<tr>
<td>415</td>
<td>Public Policy</td>
<td>See <a href="http://www.simsmm.com/investors/governance">www.simsmm.com/investors/governance</a></td>
</tr>
<tr>
<td>416</td>
<td>Customer Health and Safety</td>
<td>p.08: See <a href="http://www.simsmm.com/investors/governance">www.simsmm.com/investors/governance</a></td>
</tr>
<tr>
<td>417</td>
<td>Marketing and Labeling</td>
<td>N/A</td>
</tr>
<tr>
<td>418</td>
<td>Customer Privacy</td>
<td>N/A</td>
</tr>
<tr>
<td>419</td>
<td>Socioeconomic Compliance</td>
<td>N/A</td>
</tr>
</tbody>
</table>