



Whistleblower Policy

Version 3 — Reviewed Date: November 2025

Issuing Function: Legal

Approving Body: Sims Board of Directors

Document Type: Policy

Scope:

Business / Function: Global

Applicable Population: All current and former employees, contractors, suppliers, associates and their relatives globally

Governing Document: N/A

Next Review: December 2026

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1. Introduction

1.1 Sims' Commitment to speaking up

Sims is committed to integrity, accountability and doing the right thing. This policy encourages all employees, contractors, suppliers and other stakeholders to report concerns about unethical, illegal or improper conduct or when our values and standards of conduct are not being followed (**Business Conduct Concern**). We are committed to protecting those who speak up.

This policy explains:

- What type of misconduct can be reported
- How to report it confidentially
- What happens after a report is made
- How Sims protects people who speak up

1.2 Who can report?

Anyone connected to Sims can raise a Business Conduct Concern under this policy (**Report**). These individuals are referred to as **Reporters**. This includes:

- Current and former employees, directors and officers
- Contractors, suppliers and their staff
- Volunteers or trainees
- Independent auditors
- Relatives or dependents of any of the above
- Community members and shareholders

1.3 Australian Whistleblower Laws

Specific protections apply under Australian whistleblower laws to certain Reports. To qualify, an eligible person (listed below) must make a Report for which they have reasonable grounds to suspect a Business Conduct Concern to an eligible recipient (see section 3.2).

For the purposes of Australian whistleblower laws, an eligible person is a:

- current and former employee, director and officer
- contractor or supplier, and their staff
- volunteer or trainee that supplies goods or services to Sims
- an individual who is an associate of Sims
- relative or dependent of any of the above

However, anyone with a Business Conduct Concern is encouraged to make a Report.

Protections include anonymity, confidentiality, immunity from legal liability for making the Report, and protection from victimisation and retaliation (see section 6).

2. What can be reported?

A Reporter can make a report a Report about any suspected or actual Business Conduct Concern, including anything that seems to be:

- unethical or dishonest (e.g. data manipulation, false records, questionable business practices)
- illegal or criminal (e.g. fraud, bribery, corruption, theft, drug sale or use, violence)
- unsafe (e.g. unsound environmental or workplace practices)
- victimisation or harassment
- a serious breach of Sims' Code of Conduct
- abuse of authority or conflicts of interest
- conduct likely to damage Sims' financial position or reputation
- a cover-up of any of the above

You should make a Report even if you are unsure if something is a Business Conduct Concern.

When reporting, you are required to have reasonable grounds to believe the information you are disclosing is true, but you will not be penalised if the information turns out to be incorrect. You must not make a Report that you know is not true or misleading. Where it is found that a person has knowingly made a false or misleading Report, this will be considered a serious matter and may result in disciplinary action.

Personal work-related grievances (e.g. interpersonal disagreements over pay, promotion, or workplace relationships) are not considered Reports for the purposes of this policy and do not qualify for protection. These matters should be addressed through standard HR procedures, unless they involve misconduct, a legal breach, or retaliation related to making a Report.

3. How to speak up

A Reporter can choose the option they are most comfortable with to make a Report (however, only Reports made under section 3.2 will qualify under Australian whistleblowing laws):

3.1 Internal Contacts

We encourage Reporters who are not seeking to make Reports under the Australian whistleblowing laws to contact their manager in the first instance. Alternatively, a Reporter can contact another Sims

leader (ELT or other manager) or a Function representative (Human Resources, Legal, Company Secretary or Group Assurance).

Sims also has a 24/7 Hotline for making Reports www.SimsHotline.com (anonymous option available - you can find local phone numbers on the website or file the complaint electronically). Reports made via the Hotline will be provided to the Global General Counsel and Head of Assurance.

Sims contact details for raising Reports are:

- **Email:** ethics@simsmm.com
- **Phone:** In the US call +1 888 412 4923. In Australia, call 1800 242 874. For phone numbers in other jurisdictions, visit www.SimsHotline.com.
- **Post:** Sims Limited
Attention: Gretchen Johanns
200 W Madison St, Suite 3950
Chicago, IL 60606

You can also speak to:

- **Gretchen Johanns**
Group General Counsel
+1 845 260 1993
gretchen.johanns@simsmm.com
- **Brad Baker, Chief HR Officer**
+1 801 231 7135
brad.baker@simsmm.com

3.2 Reports made under Australian law

For a Report to be protected under Australian whistleblower laws, it must be made to an **Eligible Recipient** which includes:

- Executive Leadership Team
- Company Secretary
- Directors
- Sims' auditors
- Lawyers, including a member of Sims' legal team (in their capacity as legal counsel)
- Head of Assurance: Luisa Young luisa.young@simsmm.com
- 24/7 Hotline www.SimsHotline.com
- **Email:** ethics@simsmm.com
- **Phone:** +1 888 412 4923 in the US, 1800 242 874 in Australia or visit www.SimsHotline.com for phone numbers in other jurisdictions.

- **Post:** Sims Limited
Attention: Luisa Young
Level 9, 189 O’Riordan Street
Mascot NSW 2020

We encourage Reporters to Report internally first, so that we can investigate the allegations and take appropriate action. However, Reporters are always free to contact:

- Regulators (e.g. ASIC, APRA, ATO)
- Law enforcement (e.g. local police or AFP)
- External legal advisers

The law also protects certain disclosures made in an “emergency” and “public interest” situations, in which case disclosures can be made to additional recipients following a special process under the law (including to members of parliament and professional journalists). Please contact Sims’ Group General Counsel if you would like more information about emergency and public interest disclosures.

4. Investigating Reports

4.1 What to expect after submitting a Report

If Reporters include contact details, we’ll acknowledge their Report within seven (7) days.

All Reports will be reviewed and assessed. Sims’ response will vary depending on the nature of the Report and the amount of information provided. The Report may be addressed and resolved informally, or Sims may assign an independent internal or external investigator with relevant experience (**Investigator**). Any investigation will be conducted confidentially, fairly, and promptly. Sims will take appropriate action and, where possible, will let you know the outcome.

If the report involves the Executive Leadership Team, the matter will be referred to the Chair of the Audit Committee to appoint an appropriate Investigator.

4.2 Investigation Process

Any Investigator appointed will carry out an objective and discreet process, following Sims’ procedures.

This may involve:

- reviewing documents and records
- asking the Reporter (if contact details are provided) for information, such as dates, relevant evidence, and names
- informing an implicated person that a complaint has been made against them and they will be given an opportunity to respond

- interviewing people involved or with relevant knowledge
- making observations where necessary
- consulting employee representatives if required
- determine whether the allegation is substantiated.

Investigators are not responsible for making recommendations to Sims regarding disciplinary action.

The Investigator will aim to complete the investigation promptly, maintain confidentiality throughout, and ensure fairness to all parties involved. If a Reporter provides contact details, the Investigator may follow up for clarification or additional details.

5. Outcome of Investigations

5.1 What happens after an investigation?

At the end of the investigation, the Investigator will provide a written report to the Global General Counsel (or to the Chair of the Audit Committee if the Report relates to the Executive Leadership Team) who will inform the appropriate management of the findings.

If the allegations are substantiated, the appropriate response will be determined. This may include correcting the conduct and implementing measures to prevent recurrence.

If disciplinary action is required, it will follow Sims' standard procedures. If allegations are not substantiated, the person involved will continue their role without prejudice.

5.2 Will I be informed of the outcome?

Subject to confidentiality and privacy, Sims will update the Reporter of the outcome of their Report, including any status updates regarding the investigation and actions taken. Any updates depend on having a way to contact the Reporter. Where appropriate, an outcome will be provided to the Reporter within approximately three months of the investigation commencing, noting that more complex matters may require additional time.

In some circumstances, it may not be appropriate to inform Reporters of the outcome of investigations.

6. Protecting Confidentiality

6.1 Will my report be treated confidentially?

Sims is committed to treating Reports seriously, confidentially and fairly. Sims will not share a Reporter's identity unless:

- they agree
- disclosure is required by law
- it is reasonably necessary for an investigation (and reasonable steps are taken to protect the Reporter's identity, including limiting access to only those who have a need to know)
- Disclosure is made to a lawyer for the purpose of obtaining legal advice or representation

Any unauthorised disclosure of a Reporter's identity, or information from which their identity could be inferred, is a serious matter. It may result in disciplinary action under Sims' procedures as well as legal liability.

All records relating to Reports are stored securely and accessed only by authorised personnel.

6.2 Will the Reporter be protected?

Sims will not tolerate retaliation against anyone who raises a Business Conduct Concern or is suspected by another person of making a Report. For Reports made under Australian law, Reporters are protected from:

- civil, criminal or administrative liability (including disciplinary action) for making a Report
- being sued for breach of confidentiality or contract
- use of their Report as evidence against them (except if false or malicious)
- being ordered to pay legal costs if they seek compensation in court proceedings.

Sims prohibits any form of reprisal from making a Report, including any act or omission amounting to retaliation, discrimination, harassment, exclusion, intimidation, humiliation, victimisation, termination of employment or demotion against a Reporter. This also extends to a Reporter's colleagues, employer (if not employed by Sims) or relatives.

Any retaliatory conduct will be treated as serious misconduct and handled under Sims' disciplinary procedures. If a Reporter who has made a Report under Australian whistleblower laws believes they have been subjected to retaliatory conduct by the Company, they have rights under the *Corporations Act 2001* (Cth) and the *Fair Work Act 2009* (Cth). Sims also makes its Employee Assistance Program available to support Reporters.

These protections do not excuse Reporters from accountability for any wrongdoing they have engaged in that is disclosed in their Report.

6.3 Can I make a report anonymously?

Yes. Anonymous reports may limit Sims' ability to provide updates or seek further information, so we hope that Reporters will feel comfortable providing us with their name and contact details.

7. Training and Review

This Policy is reviewed annually. Sims also raises awareness of this policy through management communications and training to employees.

We inform our Board of material concerns raised under this policy.

Version History

VERSION	APPROVING BODY	DATE	SUMMARY OF CHANGES
1.0	Board of Directors	October 2019	Original policy
2.0	Board of Directors	November 2021	Refinements prompted by the EU Whistleblower Protection Directive, including description of covered persons, contact information, the investigation process and notifications, reporter confidentiality, and intolerance for retaliation.
2.1	n/a	December 2024	Review. No changes identified.
2.2	n/a	December 2023	Review. Outdated information was corrected.
3	Board of Directors	November 2025	Rewrite aimed at improving clarity, brevity, legal compliance, and accessibility for diverse audiences. The revisions preserve all substantive protections and commitments while aligning with the latest global whistleblower protection laws.