

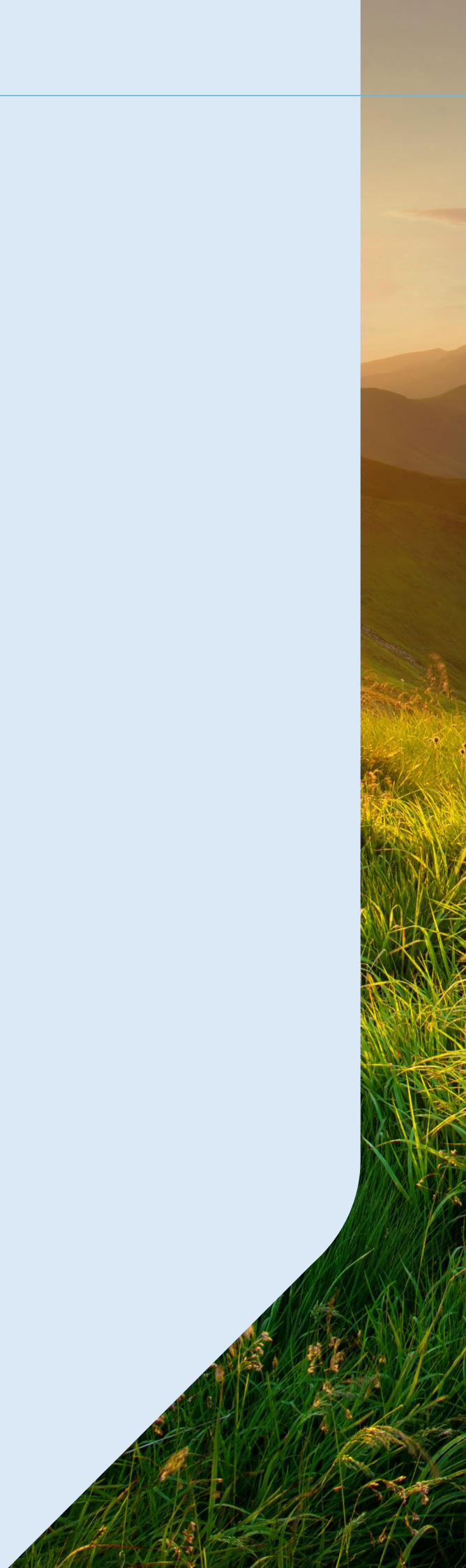


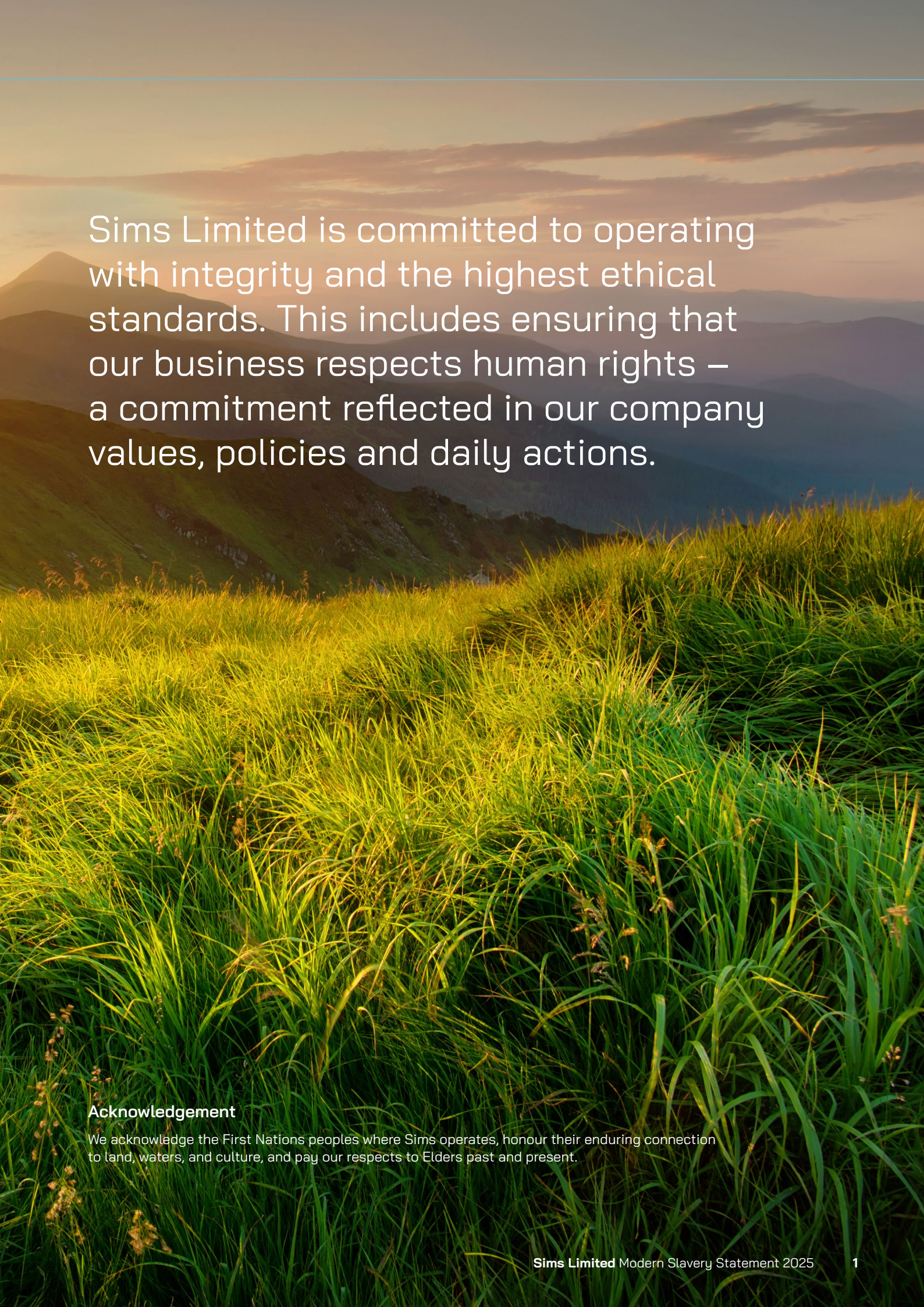
Protecting People. Shaping Change.

Executing on strategy to deliver sustainable returns

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Sims Limited is committed to operating with integrity and the highest ethical standards. This includes ensuring that our business respects human rights – a commitment reflected in our company values, policies and daily actions.

Acknowledgement

We acknowledge the First Nations peoples where Sims operates, honour their enduring connection to land, waters, and culture, and pay our respects to Elders past and present.

Our Commitment

Compliance statement

This joint Modern Slavery Statement is made by Sims Limited, Sims Group Australia Holdings Limited (ACN 008 634 526), and Sims E-Recycling Pty Limited (ACN 114 176 493) under the Modern Slavery Act 2018 (Cth). It outlines actions to identify, assess, and address modern slavery risks across Sims' global operations and controlled entities. References to "Sims," "the Company," or "the Group" mean Sims Limited and its subsidiaries (Appendix A). This Statement covers Sims' operations, projects, and assets (including joint ventures) from 1 July 2024 to 30 June 2025.

Commitment statement

Upholding human rights is essential to ethical business conduct. We are committed to creating a safe, fair workplace and a responsible supply chain, guided by the Universal Declaration of Human Rights, International Labour Organisation Core Conventions on Labour Standards, Organisation for Economic Cooperation and Development Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights.



"We are committed to fair treatment for all and to preventing exploitation across our operations and supply chains."

Stephen Mikkelsen
CEO and Managing Director

Company overview

Headquartered in Sydney, Australia, Sims is a global leader in resource recovery and recycling. Through Sims Metal and Sims Lifecycle Services, we deliver innovative, circular solutions that reduce waste and carbon emissions, and advance our purpose of creating a world without waste to preserve our planet.



By recycling ferrous and non-ferrous metals, Sims Metal enables the production of steel, aluminium, and copper with a significantly lower carbon footprint.



SLS focuses on IT asset and cloud infrastructure reuse, redeployment, and recycling. By maximising reuse and material recovery while minimising waste, SLS drives circularity and reduces carbon emissions.

Sims Resource Renewal ceased operations on 1 May 2025. Until then, it contributed to the circular economy by seeking to develop solutions to repurpose automotive shredder residue from end-of-life vehicles and goods.

Fostering accountability across our business

We have global mechanisms in place to identify and manage modern slavery risks across our operations and supply chains. These efforts extend to our business partners and reflect our commitment to ethical practices.

Governance structure

We are committed to human rights, including workplace safety, fair wages and equal treatment, supported by strong leadership, clear guidance, training and oversight. The Board's Safety, Health, Environment, Community and Sustainability Committee oversees our modern slavery approach, with a report provided to the Committee annually.

FY26 COMMITMENT

Management Accountability

In FY26, we will strengthen oversight by including a question in the half-yearly Management Representation Letter process that prompts leaders to confirm whether they are aware of any modern slavery concerns involving current vendors that have not been reported through appropriate internal channels (e.g. Procurement, Legal, or the Whistleblower hotline).

OVERSIGHT

Sims Limited Board of Directors



IMPLEMENTATION

Executive Leadership Team



GOVERNANCE

RISK GROUP

- Safety
- Environmental
- Sustainability
- Modern slavery
- Community engagement

HUMAN RESOURCES

- Fair wages
- Collective bargaining
- Equal opportunity employment

MANAGEMENT

- Embedding strong practices
- Leadership by example

MONITORING

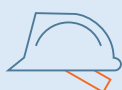
INTERNAL AUDIT

ETHICS & COMPLIANCE



Core values

Our core values guide our purpose, prioritising safety, integrity, respect for communities, socially responsible initiatives, and transparent reporting.



SAFETY

Safety will always be our first priority. We believe that all injury incidents are preventable, and we are committed to a goal of zero injuries.



TRANSPARENCY

We ensure a sense of appropriate transparency in everything we do.



INTEGRITY

We conduct all business with integrity and adhere to the highest standard of ethical business conduct.



EXCELLENCE

We commit to excellence in everything we do and champion continuous development and sharing of best practices across the company.



RESPECT

We will treat each other, our customers, visitors and community members with respect and dignity.



SOCIAL RESPONSIBILITY

We aim to be the world's safest and most responsible recycling and recovery company.

Policies

Our global policies are key governance tools for protecting human rights and preventing modern slavery. Each is reviewed regularly.

Policy Name	Text
Human Rights Governance Policy	Affirms our commitment to respect, promote, and uphold human rights in all business activities.
Human Rights Remediation Process	Provides guidance on human rights investigations and effective remediation.
Code of Conduct	Reinforces human rights commitments, including equal opportunity, safe workplaces, fair pay, freedom of association, and zero tolerance for retaliation.
Anti-bribery, Anti-corruption, and Anti-fraud Policy	Defines expectations for ethical business conduct, prohibiting bribery, corruption and fraud.
Whistleblower Policy	Provides channels for reporting human rights and modern slavery concerns, investigation processes and protections against retaliation.
Supplier Code of Conduct	Sets expectations for suppliers to uphold human rights and maintain required controls.

FY25 ACTIVITY

GLOBAL POLICY MANAGEMENT SYSTEM

In FY25, we committed to developing a global policy management system that centralises storage and maintenance of policies. We have strengthened our governance and delivered on this commitment, ensuring employees can reliably access the latest versions.

WHISTLEBLOWER POLICY

In FY25, we reviewed and improved our Whistleblower Policy to ensure it is clear, accessible, and easy to understand, with well-defined and straightforward reporting avenues to support and protect individuals who speak up.

DEVELOPMENT OF PROCUREMENT INTRANET PAGE ON MODERN SLAVERY

In FY25, we launched an internal modern slavery intranet page within our Procurement site to support awareness and compliance. It outlines Sims' human rights commitments, highlights supply chain risks and provides guidance on using standard contract terms and key policy documents to help manage modern slavery risks.

Risk Assessment Process

In FY25, we assessed global operation and supply chain risks by geography and industry. We use public indices, including the Global Slavery Index, the International Labour Organization Composite Score, and Global Rights Index, along with guidance from NGOs, governments, and media reports.



FY25 ACTIVITY

RISK ASSESSMENT REVIEW

In FY25, we completed a hot spot analysis with third-party experts (Pillar Two), strengthening our understanding of modern slavery risks and evaluating the effectiveness of past assessments. We also expanded business engagement in this review, working with multiple functions to deepen insights across regions and business units. Although we have not yet incorporated the findings into our risk assessment process, this comprehensive analysis will set the basis for a refreshed approach to our risk assessment methodology and associated actions (refer FY26 Commitment).



FY26 COMMITMENT

RISK ASSESSMENT REVIEW

Building on the insights from our FY25 hot spot analysis, in FY26 we will advance our efforts to identify and assess modern slavery risks through deeper engagement across the business and further analysis of how these risks may affect our operations and overall risk profile. This will inform updates to our risk assessment methodology and guide targeted mitigation efforts.

Geographically Diverse Footprint



Metal facilities

275



Lifecycle services

20



Shredders

44



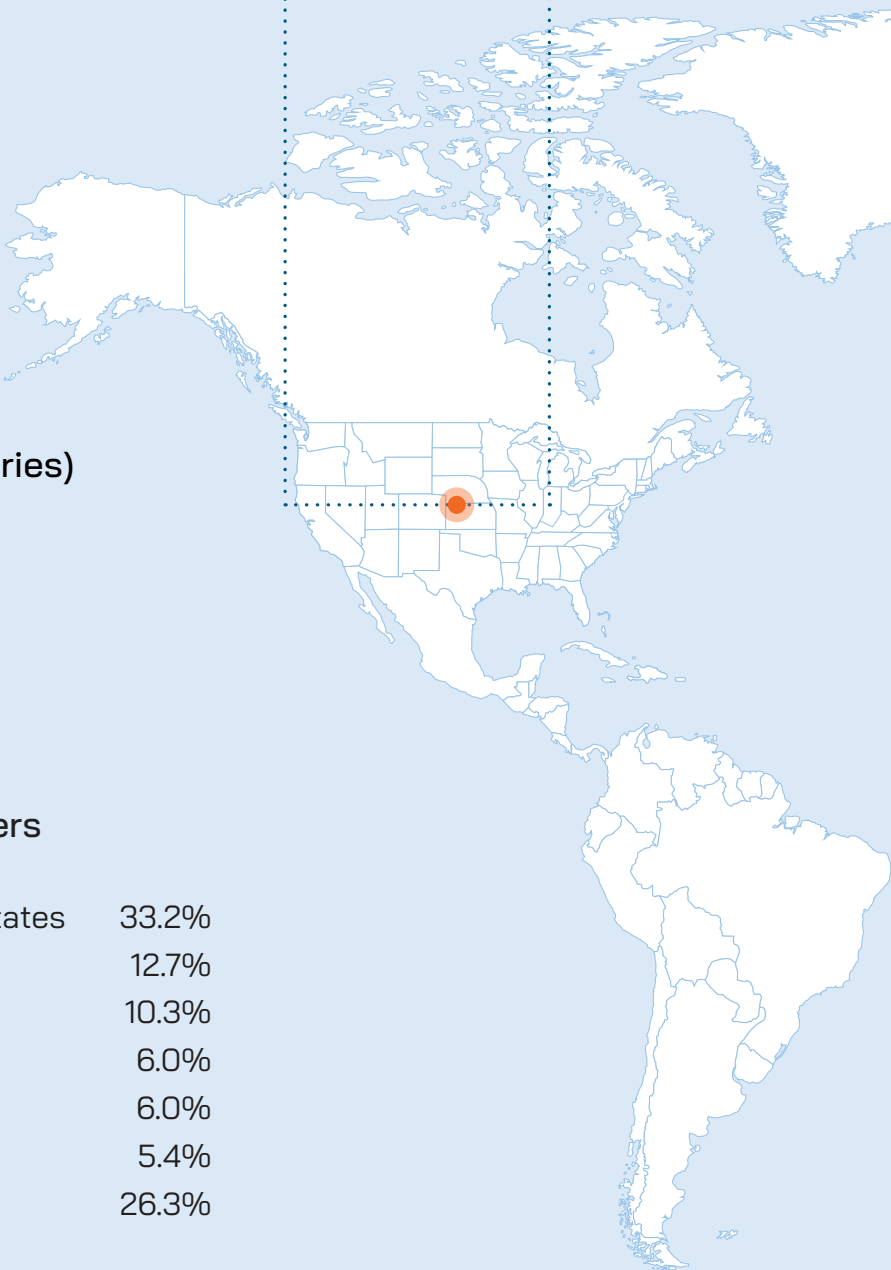
Global footprint (countries)

13

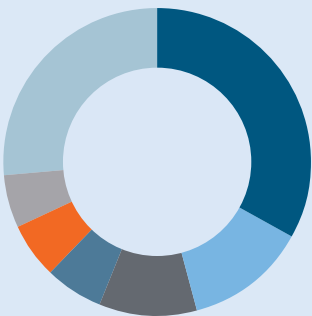
North America



SA Recycling



Sales revenue to external customers



United States	33.2%
Turkey	12.7%
China	10.3%
India	6.0%
Australia	6.0%
Thailand	5.4%
Other	26.3%

Our facilities

We operate in 295 facilities across 13 countries as of 30 June 2025; we manage 147 of these facilities.¹



¹ Including Brazil and Mexico

² Including Ireland

³ Including Papua New Guinea

¹ We sold our UK Metal division, effective 30 September 2024.

Our workforce

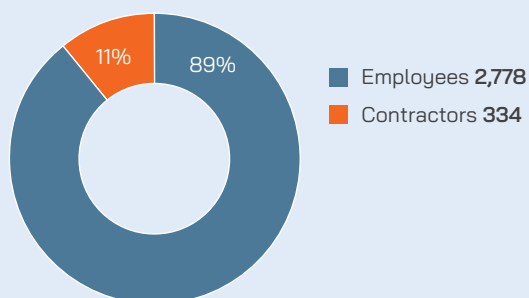
Our workforce is stable, with year-round employees primarily drawn from nearby communities. Most of our facilities are in urban areas, where workers benefit from access to education, social services, legal resources and diverse employment opportunities.



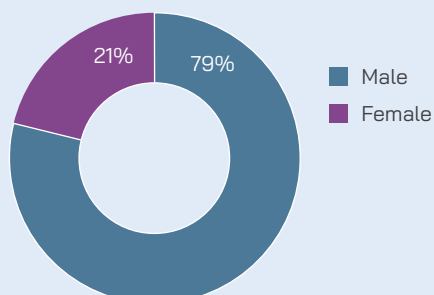
Workforce composition FY25 Sims Limited

Americas

Employee Type



Gender Diversity

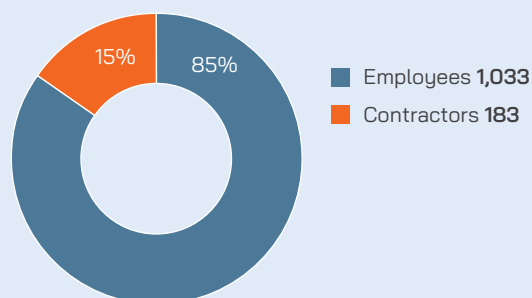


Total workforce

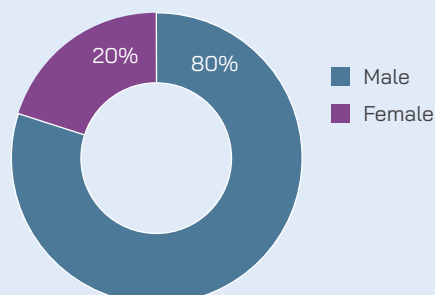
3,112

Australia Pacific

Employee Type



Gender Diversity



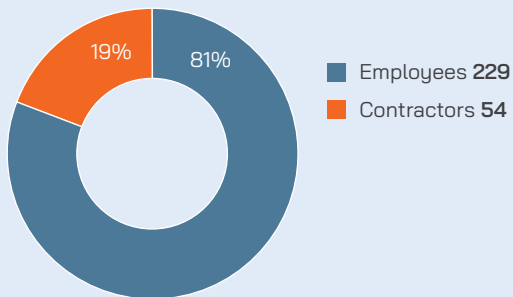
Total workforce

1,216

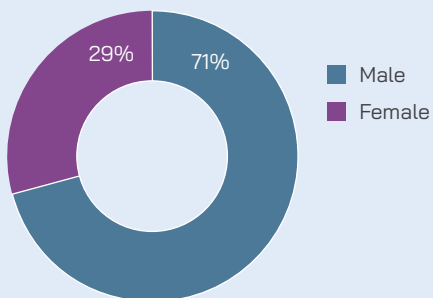


United Kingdom & Europe

Employee Type



Gender Diversity

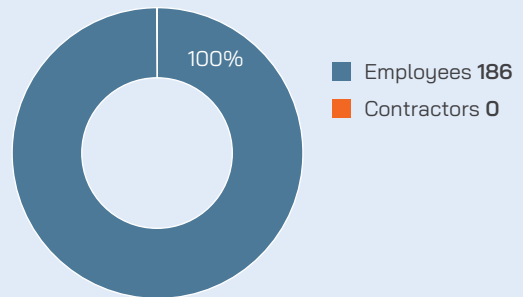


Total workforce

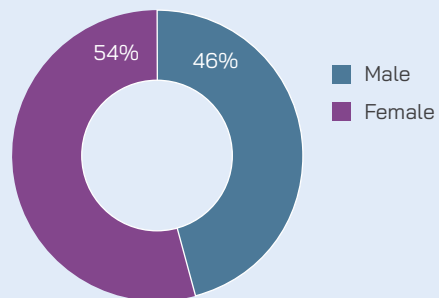
283

Global ^(a)

Employee Type



Gender Diversity



Total workforce

186

(a) Global means employees that are supporting the global business



Our risks

Overall modern slavery risks

Key modern slavery risks in our workforce include:

- **Forced labour** - Employees may be controlled by others restricting freedom and access to resources.
- **Debt bondage** - Some employees may carry significant pre-employment debts.
- **Child labour** - Risk of employing workers under legal age.

Risks factors

Language Barriers

Employees with limited English may face risks such as misunderstanding employment contracts or failing to understand and follow Sims' human rights safeguards.

High-Risk Geographies: Papua New Guinea operations

This is the only location we have categorised as high-risk (using our existing methodology) exposure to modern slavery in relation to our workforce.

Use of low-skilled labour for certain tasks

This could be a potential factor contributing to a lack of understanding by the particular workers of their workplace rights and entitlements, and higher likelihood of engaging in informal working arrangements.

Our risk response

Employee rights

Diversity, Equity and Inclusion

We promote diversity, equity, and inclusion through fair hiring, equitable pay, and valuing each employee's unique attributes, guided by HR strategies.

Freedom of association

Employees' rights to unionise or collectively bargain are respected, with mechanisms such as unions in North America and Australia/New Zealand, and works councils and/or unions in Europe and the United Kingdom. Participation is voluntary unless otherwise required by agreements.

Eligibility to work

Rigorous checks ensure legal working age and guard against trafficking. Where permitted, testing also helps identify individuals under external control, such as debt or substance dependency.

Papua New Guinea

Child labour risks in Papua New Guinea are heightened by limited birth registration and cultural practices that de-emphasise birthdays, leaving many people without proof of age. We apply practical methods (e.g. physical assessment, context-based questioning) to assess age and hire only when confident candidates are at least 18. Relevant training modules have also been translated to Tok Pisin, the official language in Papua New Guinea.



Employee understanding

Ongoing training and communications embed human rights awareness into daily business practices.

Onboarding

New hires are expected to complete Code of Conduct and Ethics and Compliance New Hire (of which modern slavery is a component) training within 90 days to establish expectations for ethical conduct, reporting concerns, and awareness of modern slavery risks and signs.

Code of Conduct & Human Rights Awareness

Annual training reinforces unbiased hiring, anti-bribery, fair business practices, and proper reporting of concerns. In Papua New Guinea, content is tailored with local case studies and translated into Tok Pisin.

Human Rights Training

Employees exposed to human rights risks, such as those in key processes, high-risk regions, or roles with direct exposure to vulnerable individuals, receive annual training, while all employees complete human rights training at least every three years.

Fair business practices

Commercial employees are trained annually on bribery, corruption and anti-competitive practices to protect vulnerable populations.

Ethics & Compliance Activities

We carry out workforce engagement activities that use interactive learning and competitions to reinforce prevention of bribery, fraud, modern slavery and human rights protection.

Accessibility

Training and policies use clear, straightforward language and relatable examples, multiple languages, and bi-lingual support when needed.

FY25 ACTIVITY

PROCUREMENT TRAINING

We developed and launched the *Sims Principles of Procurement* eLearning module to support targeted employees in understanding our standardised procurement policies, processes, and tools, including guidance on key legislation such as modern slavery.

Our risk response *continued*

Employee voice

We recognise that even strong controls and processes can fail, so employees and others are encouraged to report concerns confidentially through multiple channels.

Open-door reporting

Employees may raise issues directly with managers, Human Resources, the Global Ethics & Compliance team or leadership.

Hotline

An independent third-party hotline is available in multiple languages for employees, suppliers, and external parties. Reports can be made via phone or online, anonymously if preferred, with two-way communication maintained anonymously. It is promoted via training and workplace posters.

Papua New Guinea

A dedicated third-party grievance mechanism includes a toll-free Tok Pisin-speaking hotline, with posters in English and Tok Pisin explaining how and what to report.

FY25 ACTIVITY

CASE MANAGEMENT STANDARDISATION

In FY25 we leveraged the transition to our new Ethics and Compliance platform to implement a global standard for documenting internal investigations. The centralised system promotes consistency in data capture and outcome reporting, improving our ability to detect trends and identify outliers.

Employee engagement

Surveys and polls

We capture employees' experiences and perceptions of our compliance culture through workforce engagement surveys, informal polls and quizzes to encourage dialogue and awareness.

Ethics & Compliance Committee

The Global Ethics & Compliance team engages with its cross-functional Ethics & Compliance Committee, whose members provide oversight, feedback and insights on risks, process effectiveness, and proposed initiatives.



Our effectiveness

Diversity

Representation of women (%) Sims Limited

	FY25	FY24
Total workforce	23%	21%
Board representation	33%	38%
Executive and senior leaders	23%	21%
Managers	23%	21%

New Hires in Leadership Roles

	Female	Male
Sims Lifecycle Services	0%	14%
Metal	0%	14%
Multi Business ^(a)	43%	29%
Grand Total	43%	57%

Percentage of new hire employees in leadership roles (job grade 20+) by gender

(a) Multi Business includes roles that support more than one business and are generally group or regional shared services roles.

Collective bargaining agreements

Collective bargaining agreements FY25

Percentage of employees at 30 June 2025 out of total workforce who are covered by a collective bargaining agreement

	FY25	FY24
Australia & New Zealand	40%	40%
North America	30%	28%
Europe/Rest of World ^(a)	<5%	<5%
Total	30%	25%

(a) This is a voluntary disclosure. We have sold the UK Metal business hence there is no reporting for UK. For the rest of Europe and given the levels of voluntary disclosure, we estimate approximately less than five percent representation for Europe.

Training completions

Achieved 85% completion of Ethics and Compliance New Hire training for the target population.

Course	% Complete at 30 Jun 2025	% Complete at 31 Jul 2024
Code of Conduct	92%	>99%
Ethics and Compliance New Hire Training / Modern Slavery	85%	100%

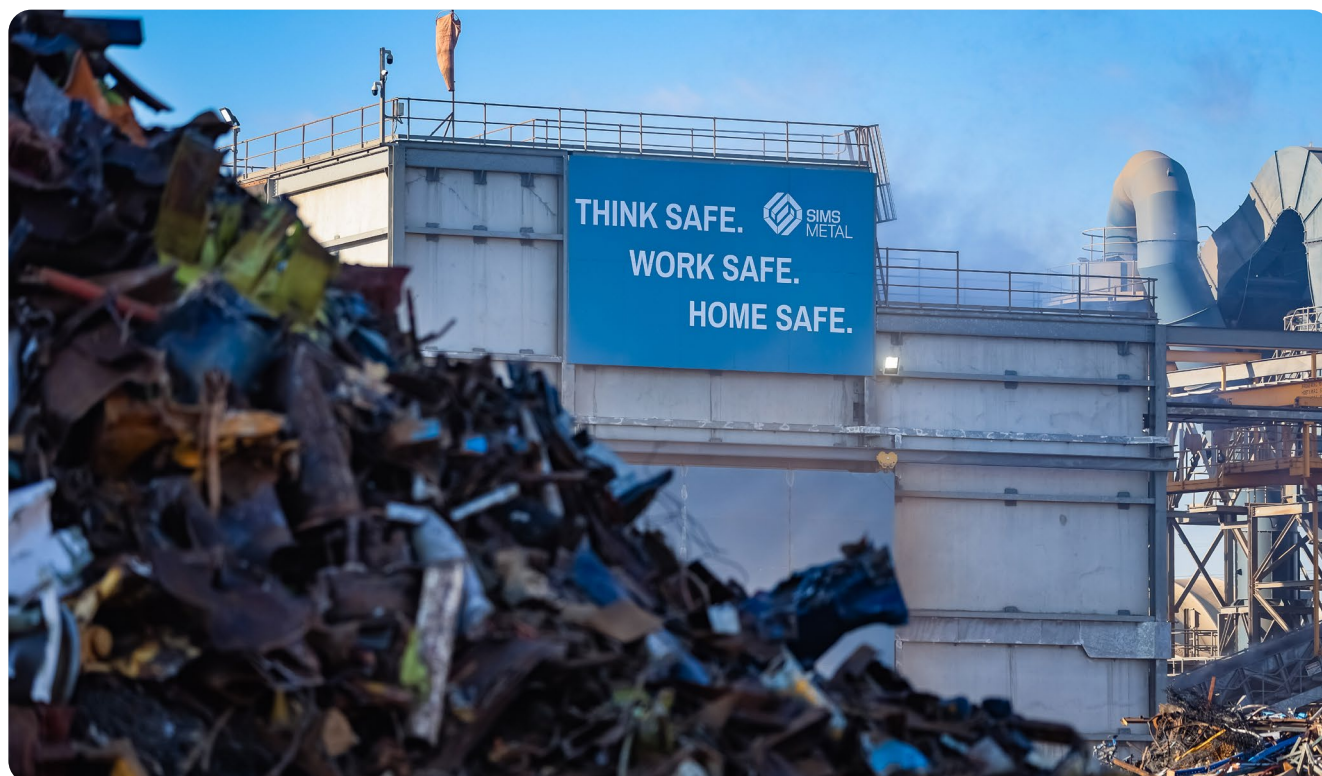
Grievance reporting

In 2025, 193 reports were received via our hotline and open-door channels, mostly internally, reflecting employee trust and confidence in our non-retaliation process.

	FY25	FY24
Total reports	193	171
Substantiated hotline reports	55%	36%
Modern slavery-related reports	0	2
Substantiated modern slavery-related reports	0	1

Our value chain

Our customers are steel mills, smelters, multinational corporations, municipalities and manufacturers. Non-trade suppliers provide standard business services such as transport, temporary labour, utilities, and office supplies. Our trade supply chain is mostly single-tier, sourcing materials directly from suppliers, with additional depth when subcontractors process materials in regions without a Sims Lifecycle Services presence.



Our risks

Modern slavery risk in our supply chain depends on country, activity type, supply chain complexity, workforce composition, and operational visibility.

High-risk countries by our purchases

In FY25, 99.19% of our purchases were from lower-risk countries, compared with 97.54% in FY24.

The table below shows a breakdown of purchases from high-risk suppliers and their share of total company spend, split by country:

		FY25		FY24	
Region	High-Risk Country	# Suppliers	% Spend	# Suppliers	% Spend
APAC					
	China & Hong Kong	6	0.10%	71	0.64%
	Pakistan	0	0%	105	<0.01%
	Papua New Guinea	75	0.72%	154	0.21%





Our risks *continued*

Conflict Minerals

Our equipment contains tungsten, tantalum, tin, gold and cobalt, which may originate from regions with slavery risks, including the Democratic Republic of Congo, affecting SLS customers and our IT suppliers.

Trade suppliers

Modern slavery risks for trade suppliers may involve forced or child labour and debt bondage.

 SIMS METAL	 SIMS LIFECYCLE SERVICES
<ul style="list-style-type: none"> ■ Casual suppliers: self-employed individuals, sometimes supported by friends or family, who may be subject to forced or unpaid labour. ■ Dealers and industrial suppliers: Larger operations that may rely on forced or child labour, underpay workers, or impose unsafe conditions. 	<ul style="list-style-type: none"> ■ Original equipment manufacturers and multinational suppliers: provide materials for e-recycling; globally scrutinised but may still carry human rights risks. ■ Subcontractors and downstream vendors.

Subcontractors and downstream vendors

Sims Lifecycle Services engages subcontractors in regions where we lack a physical presence. Without proper controls, these subcontractors (and their downstream vendors) may pose modern slavery risks, including forced or child labour.

Subcontractors and downstream vendors by regions and high-risk countries:

Region	High-Risk Country	FY25	FY24
AMER		106	101
APAC		29	23
	China & Hong Kong	5	5
EMEA		53	46

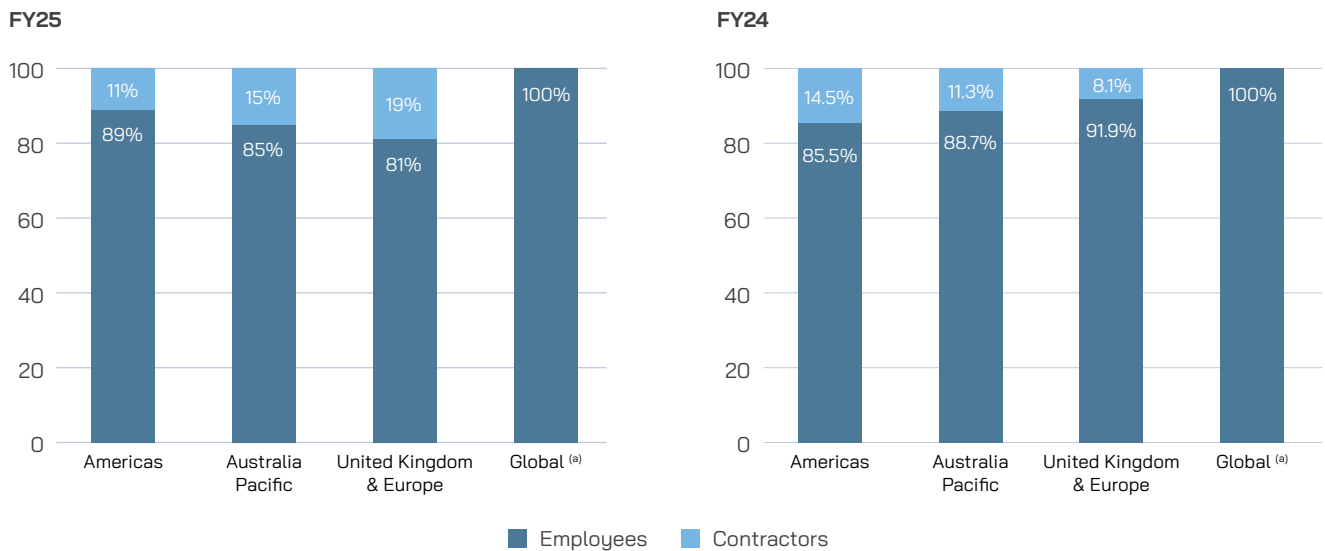
Data reflects subcontractors engaged under Sims Lifecycle Services contracts.

Non-trade suppliers

Temporary labour agencies

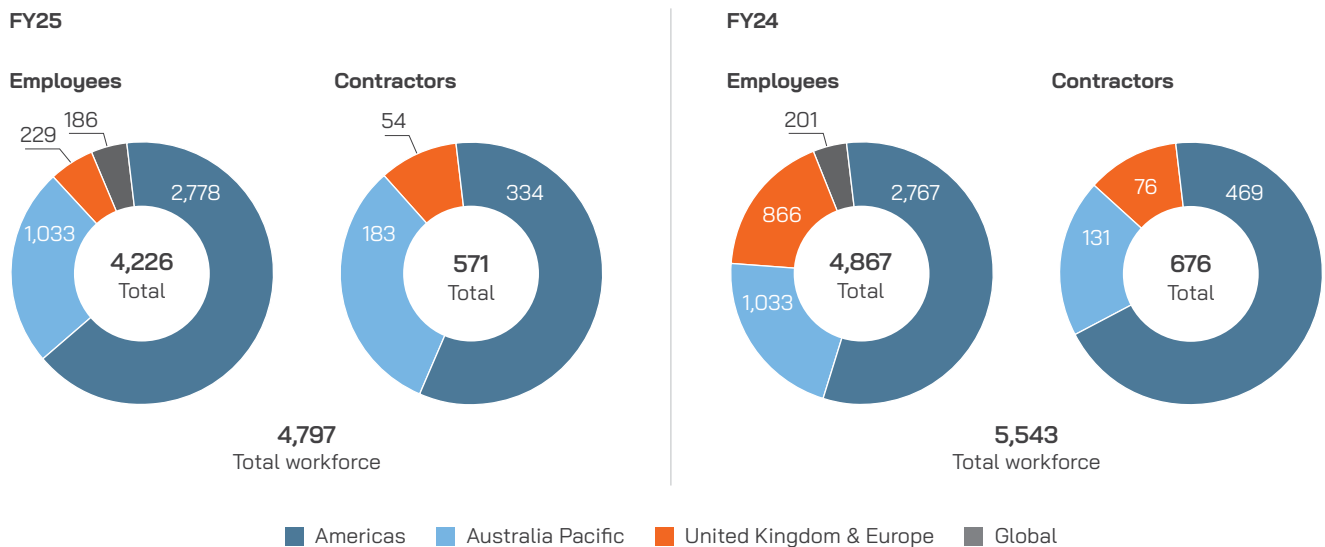
We use temporary labour across regions and business lines, often from low socioeconomic or culturally and linguistically diverse backgrounds, which can increase modern slavery risks. Consistent demand reduces reliance on exploitative labour, while agencies and recruiters are responsible for verifying eligibility, ensuring fair wages, and applying reasonable fees. Without proper controls, workers could still be subject to modern slavery.

FY25 employee and contractor workforce composition by region



(a) Global means employees that are supporting the global business

Workforce composition FY25 Sims Limited



(a) Global means employees that are supporting the global business

Our risks *continued*

Non-Trade Supplier Risks

Personal protective equipment and uniforms

Items that we provide to employees such as safety boots, gloves, high-visibility clothing, goggles and hard hats often contain cotton and leather, materials commonly linked to forced labour.

Cleaning/security services

Roles performed outside of normal business hours with limited Sims oversight are more vulnerable to forced labour and debt bondage.

Computer equipment and electronics

Contain materials such as tungsten, tantalum, tin, gold and cobalt which may be sourced from regions where forced labour is prevalent.

Construction

Reliance on unskilled labour increases risks of forced labour or debt bondage.

Agents

While not a direct risk, unethical practices such as bribery or collusion contribute to conditions that enable modern slavery.

The table below shows agents by region. No new agents were engaged in FY25.

Region	High-Risk Country	FY25	FY24
AMER		5	3
APAC		14	17
	China & Hong Kong	1	2
	Pakistan	3	3
EMEA		5	3

Our risk response

Due diligence

New high-risk suppliers & customers

All new suppliers undergo legal due diligence and validation, with enhanced checks for high-risk cases, including business verification through online searches, sanctions and media screening through a third party platform and supplier self-assessment on human rights controls.

Each region appoints local owners to embed and maintain the process, trained and supported by Global Ethics & Compliance. Similar steps also apply to new customers in high-risk countries, primarily within Sims Metal's global trade entities.

Subcontractor

New subcontractors (SLS)

New contractors undergo rigorous due diligence, including questionnaires, on-site visits and legal review to ensure contractual controls, such as with the Supplier Code of Conduct.

Continuing subcontractors (SLS)

Continuing subcontractors are audited on a rolling basis (onsite or desktop) within 12 months, depending on risk factors such as data privacy or environmental impact, materials value and certifications.

Our risk response *continued*

FY25 ACTIVITY

SUBCONTRACTOR ENGAGEMENT TOOLKIT

Developed a toolkit for subcontractor-facing roles, informed by the FY24 engagement workshop. Trained relevant staff to use the toolkit to identify red flags onsite and engage subcontractors on risks, controls, and areas where we can provide support.

SUBCONTRACTOR OVERSIGHT

We maintained a focus on the role of subcontractor due diligence in managing modern slavery risks. This will continue in FY26, with a planned review of current practices to ensure they effectively address modern slavery risks in subcontractors operations.

FY26 COMMITMENT

SUBCONTRACTOR OVERSIGHT

We will review and strengthen our subcontractor due diligence and auditing practices to ensure they are effective in identifying modern slavery risks.

SUPPLIER DUE DILIGENCE

We will enhance supplier onboarding processes by introducing a short due diligence checklist, including 3 - 4 targeted questions to help identify potential modern slavery risks at the point of engagement.

Temporary labour agency standards

Minimum standards ensure temporary labour providers screen workers for eligibility and protect them from modern slavery risks.

FY25 ACTIVITY

EMBEDDING LABOUR AGENCY STANDARDS

We extended the implementation of our temporary labour agency standards to North America by establishing a preferred panel of temporary labour agency providers. Under their respective agreements, all providers are now contractually bound to comply with Sims' codes and policies, including the [Sims Supplier Code of Conduct](#), ensuring consistent application of our standards across regions and stronger oversight and accountability.

Accountability to our Supplier Code of Conduct

Our Supplier Code of Conduct sets expectations for all third parties and is incorporated into our Standard Terms & Conditions. Direct suppliers are not required to certify that materials are compliant with modern slavery regulations.

Vessel screening

Chartered vessels transporting bulk materials are screened via a third-party platform for ownership, operational control and potential European Union, Her Majesty's Treasury (UK), Office of Assets Control (OFAC) and OFAC non-Specially Designated Nationals (SDN) sanctions. Non-compliant vessels are not chartered.

Agent screening and training

Agents are vetted for sanctions and corruption risks, receive Code of Conduct training on bribery and fraud, and must confirm understanding of compliance obligations at onboarding and periodically thereafter.

Our effectiveness

Subcontractor and downstream vendor audits

Independent personnel conduct audits using global programs. The table below summarises audits status and type, highlighting high-risk countries. Audits of Russian and Ukrainian subcontractors are on hold due to the suspension of business in these regions.

	FY25 Subcontractor	FY25 Downstream Vendor	FY24 Subcontractor	FY24 Downstream Vendor
Scheduled	16%	14%	23%	18%
Onsite	11%	5%	16%	10%
China/Hong Kong	-	-	-	-
Desktop	5%	9%	7%	8%
China/Hong Kong	-	-	-	-
Closed	60%	50%	59%	54%
Onsite	11%	2%	7%	6%
China/Hong Kong	-	-	-	-
Desktop	45%	47%	50%	48%
China/Hong Kong	4%	1%	2%	<1%
In Progress	24%	36%	18%	28%
Onsite	-	-	1%	-
China/Hong Kong	-	-	-	-
Desktop	24%	32%	15%	5%
China/Hong Kong	-	4%	2%	-
Total	100%	100%	100%	100%
No. of Modern Slavery Concerns Identified	-	-	-	-

Due diligence results

New high-risk supplier and customer

We measure the effectiveness of our due diligence by identifying red flags among suppliers and customers and tracking their resolution. No issues were identified during due diligence and escalated in accordance with our procedures.

Vessels

	FY25	FY24
Unique Vessels Screened	117	151
Unique Vessels Not Chartered Due to Modern Slavery Concerns	0	0

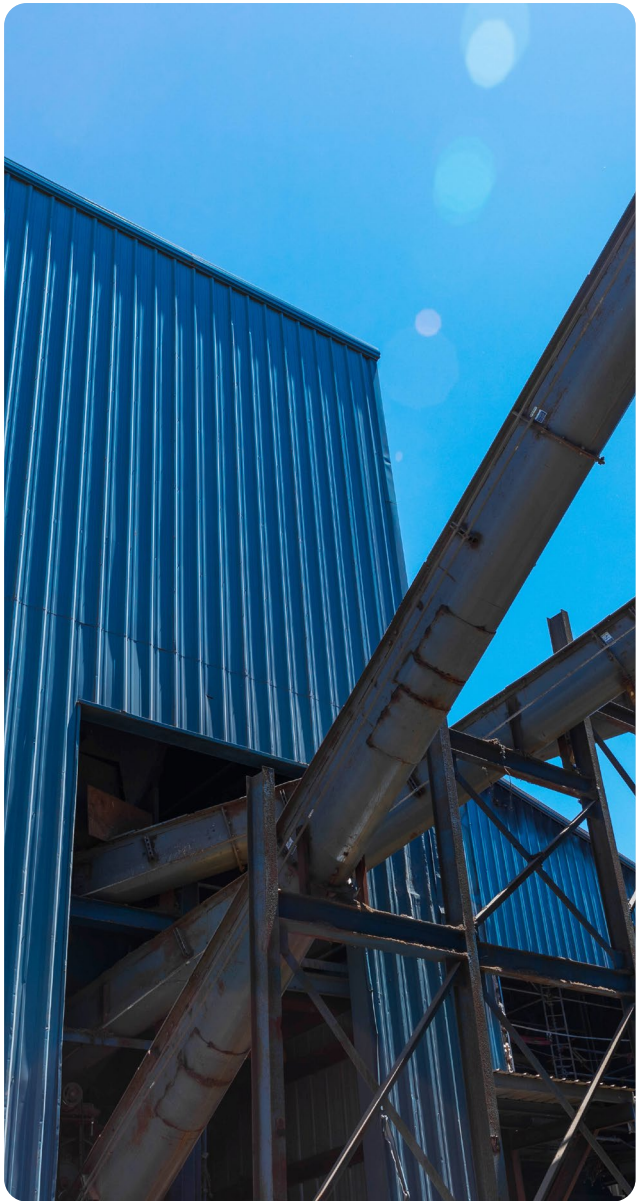
Hotline reports from third parties

Reports from third parties indicate strong awareness of and access to our grievance systems beyond employees.

	FY25	FY24
% of all hotline reports received from third parties	5%	12%
% of hotline reports from third parties related to modern slavery concerns	0%	0%

Agents

No human rights red flags were identified for existing agents through continuous monitoring. Sims did not engage new agents in FY25.



Other Relevant Information

Working with external stakeholders

Engaged with external stakeholders to stay informed on best practices, emerging risks, and effective mitigation strategies.

United Nations Global Compact

Sims Limited is a signatory to the UN Global Compact and participates in Australia's Global Compact Network (GCNA). Through programs like the Modern Slavery Community of Practice, we stay informed on emerging risks, share insights, and leverage lessons learned with other members.

Peer engagement groups

We engage with multiple peer groups, including the Business Ethics Leadership Alliance, Ethics & Compliance Initiative, and Slave-Free Alliance's Waste and Recycling Modern Slavery Working Group. These forums provide roundtables, tools, expert presentations, and discussion platforms to advance ethical practices across businesses and supply chains.

Annual General Meeting

Our Annual General Meeting allows shareholders to question directors and management on all aspects of the business, including modern slavery policies and practices.

Community engagement

We prioritise the health and safety of the communities in which we operate, many of which are also the source of our workforce. Engagement is guided by our Social Licence Framework, with dedicated local resources collaborating with communities to understand needs and implement action plans.

We continue to implement operational measures and make targeted investments to mitigate the impact of our operations on communities and the environment. These include buffer walls, equipment enclosures, tree planting to reduce noise and visual impact, and process adaptations to minimise disturbances. We also collaborate with local industry groups, councils and fire departments to enhance fire prevention and response using updated technologies.

Consultation

Our executive leadership team and Board are regularly kept informed of modern slavery initiatives and were engaged in drafting and reviewing this statement.

Our Global Ethics & Compliance team leads these efforts, participating in cross-functional discussions and group level conversations to assess governance and risk impacts. Employees also engage with local, national and international trade associations, providing insights on gender equality, environmental, and sustainability issues that affect modern slavery risks.

Guidance is sought from non-governmental organisations such as United Nations Global Compact Network Australia, Antislavery International and Human Rights Watch, while our Global Ethics & Compliance team participates in compliance networking groups to share leading human rights practices.

Other statements

Richmond Steel Recycling, our joint venture in Canada, issued a report under Canada's Forced and Child Labour in Supply Chains Act, covering only its activities.

Recognition and resolve

Sims Limited acknowledges that our operations can impact human rights. We are committed to treating all people with dignity and respect and to protective vulnerable individuals. By working with employees, shareholders, supply chains, and other stakeholders, we aim to strengthen accountability and prevent harm.

This statement was approved by the Sims Limited Board of Directors on 11 November 2025.



A handwritten signature in blue ink that reads "Phil Bainbridge".

Philip Bainbridge
Chairman and independent
non-executive director



A handwritten signature in blue ink that reads "Stephen Mikkelsen".

Stephen Mikkelsen
Global Chief Executive Officer
and Managing Director

Australian Modern Slavery Act

Mandatory Criteria

Australia Modern Slavery Act Mandatory Criteria	2025 Modern Slavery Statement
Identify the reporting entity.	Compliance statement
Describe the reporting entity's structure, operations and supply chains	Our company
Describe the actions taken by the reporting entity, and any entity it owns or controls, to assess the risks of modern slavery practices in the supply chains of the reporting entity and any entities it owns or controls.	Our governance: Risk assessment process
Describe the risks of modern slavery practices in the operations of the reporting entity and any entities it owns or controls.	Our operations: Our risks
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to address the risks of modern slavery practices in the reporting entity and any entities it owns or controls, including due diligence and remediation processes.	Our operations: Our risk response
Describe the risks of modern slavery practices in the supply chains of the reporting entity and any entities it owns or controls.	Our value chain: Our risks
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Our value chain: Our risk response
Describe how the reporting entity assesses the effectiveness of such actions.	Our effectiveness
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Other relevant information
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	Other relevant information: Consultation

Appendix A

Sims Limited entities:

- CIM Trucking, Inc. (United States)
- Elizabeth River Export LLC (United States)
- Export Enterprises, LLC (United States)
- Global Sustainability Insurance Corporation (United States)
- Kariyarra Sims Recycling Pty Ltd (Australia)
- Key Export, LLC
- Metal Management Indiana, Inc. (United States)
- Metal Management Midwest, Inc. (United States)
- Metal Management Northeast, Inc. (United States)
- Metal Management Ohio, Inc. (United States)
- Metal Management, Inc. (United States)
- New York Recycling Ventures, Inc.
- Ngardimu Pty Ltd
- PNG Recycling Limited (Papua New Guinea)
- Sims Aluminum, Inc. (United States)
- Sims ARG, Inc. (United States)
- Sims Corporate Pty Ltd (Australia)
- Sims E-Recycling Pty Limited (Australia)
- Sims Global Commodities Pte Ltd. (Singapore)
- Sims Group Australia Holdings Limited (Australia)
- Sims Group Canada Holdings Limited (Canada)
- Sims Group German Holdings GmbH (Germany)
- Sims Group Global Trade Corporation (United States)
- Sims Group Holdings 1 Pty Ltd. (Australia)
- Sims Group Holdings 2 Pty Ltd. (Australia)
- Sims Group Recycling Solutions Canada Ltd (Canada)
- Sims Group UK Holdings Limited (United Kingdom)
- Sims Group USA Corporation (United States)
- Sims Group USA Holdings Corporation (United States)
- Sims Industrial Pty Limited (Australia)
- Sims Lifecycle Reciclagem de Eletrônicos Ltda (Brazil)
- Sims Lifecycle Services BV (Netherlands)
- Sims Lifecycle Services GmbH (Germany)
- Sims Lifecycle Services Japan KK (Japan)
- Sims Lifecycle Services Limited (United Kingdom)
- Sims Lifecycle Services, S.A. de C.V. (Mexico)
- Sims Lifecycle Services sp. z.o.o. (Poland)
- Sims Limited (Australia)
- Sims Metal Management Finance Limited (United Kingdom)
- Sims Metal Management USA GP (United States)
- Sims Pacific Metals Limited (New Zealand)
- Sims Recycling Solutions Holdings, Inc. (United States)
- Sims Recycling Solutions, Inc. (United States)
- SimsLifecycle Services India Private Limited (India)
- Sims Recycling Solutions Ireland Limited (Ireland)
- Sims Recycling Solutions Pte. Ltd. (Singapore)
- Sims Southwest Corporation (United States)
- Simsmetal East LLC (United States)
- Simsmetal Holdings Pty Limited (Australia)
- Simsmetal Industries Limited (New Zealand)
- Simsmetal Properties NSW Pty Limited (Australia)
- Simsmetal Properties QLD Pty Limited (Australia)
- Simsmetal Services Pty Limited (Australia)
- Simsmetal West LLC (United States)
- SMM New England Corporation (United States)
- SMM Southeast LLC (United States)
- Trishyiraya Recycling India Private Limited (India)

The following entities are associated with a joint venture controlled by Sims Limited.

- Richmond Steel Recycling Limited (Canada)
- Rondout Iron & Metal Company, LLC (United States)
- Sims E-Recycling (NZ) Limited (New Zealand)

The following entities are associated with a joint venture controlled by Sims Limited's partner. Because Sims Limited does not control operations, this statement does not cover the activities of these entities, and they are not assessed as part of our operations or supply chain.

- SA Recycling LLC
- KDCGlobal, Inc (California)

