



# Code of Conduct

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# Letter from CEO

Sims Limited is proud of its history of leadership and social responsibility going back more than a century. Our purpose, to create a world without waste to preserve our planet, drives our business. Our core values provide the foundation we need to support our efforts. Our past and future successes rely upon these, and upon you, our personnel.

This Code of Conduct explains what the company expects of you in your role at Sims. It highlights areas you may experience in your daily activities. It also provides examples to help you live the Code every day in what you do.

No document can cover every situation. There will be times when something comes up that you are not sure how to handle. When that happens, there are other resources to help you. Sims' policies and procedures are a great place to start and if the answer is not there, ask your manager, your local Human Resources or our legal team.

It is Sims' responsibility to make sure you know what we expect of you and to help you be able to do it. It is your responsibility to understand this Code, our policies and procedures, and to follow them. If we all take responsibility for living our Code of Conduct, Sims will be around for at least another century. Keep up the good work.

Stephen Mikkelsen  
**Chief Executive Officer and Managing Director**





# Introduction

Our **Code of Conduct** is not just a guidance document; it is a tool that can help you deal with situations that you may encounter in your role. It is a practical tool to help you navigate situations. Each section starts with a summary, followed by detailed guidance if needed. Relevant policies and standards are listed at the bottom of each section.

We have included various callouts to highlight useful information such as real-world examples and other helpful information.





# Core Values

The following values are at the core of all we do:

## SAFETY

Safety will always be our first priority.

## INTEGRITY

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

## RESPECT

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

## TRANSPARENCY

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

## EXCELLENCE

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

## SOCIAL RESPONSIBILITY

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





# Sims' Purpose

Sims' purpose is to create a world without waste to preserve our planet. Everything we do – internally and externally – has to allow us to accomplish our purpose. To accomplish this goal, we:

## BAND TOGETHER

- ✓ Create an environment where our team feels that their efforts can make a difference.
- ✓ Leverage each other's strengths.
- ✓ Embrace different perspectives.
- ✓ Prepare our teams for the changes ahead.
- ✓ Build trusted relationships inside and outside of the company.

## ACCEPT AND EXPECT ACCOUNTABILITY

- ✓ Do the right thing.
- ✓ Make value-based decisions and be empowered to make tough choices.
- ✓ Think strategically and long-term.
- ✓ Practice what we preach.
- ✓ Share information to create excitement and motivate our teams.

## CONSISTENTLY INNOVATE

- ✓ Stay ahead of the curve.
- ✓ Exceed customer expectations.
- ✓ Challenge traditions with an entrepreneurial spirit.
- ✓ Encourage creative thinking and solutions – take the risks that are worth taking and view mistakes as opportunities for learning.
- ✓ Think and work at the speed of digital.

## INSPIRE WITH PASSION

- ✓ Be brave, authentic and fair.
- ✓ Lead by example and with consistency.
- ✓ Care like a family but act like a community.
- ✓ Be visible: walk the yard to show support for our teams.
- ✓ Demonstrate empathy and mutual respect.

## CELEBRATE AND HAVE FUN

- ✓ Smile and have a positive demeanor.
- ✓ Recognize and celebrate each other's accomplishments.
- ✓ Reward the little things.
- ✓ Make each other laugh.
- ✓ Value our colleagues.
- ✓ Be true to ourselves and be our true selves.



# Who Must Follow This Code?

Our Code, together with our values, is part of our decision-making. It guides how we work, act and communicate, and sets out the standards of conduct that we expect from everyone representing Sims. This includes:



## OUR PEOPLE

Sims directors, executive team, employees and contractor staff (e.g. labour hire, temporary or agency staff, and secondees).



## THIRD PARTY VENDORS AND AGENTS

Any third party that Sims engages to act on our behalf.



## SUPPLIERS AND CUSTOMERS

Suppliers and costumers who come onto Sim's property must follow our Code while at our sites.

## RESPONSIBILITIES OF ALL PERSONNEL

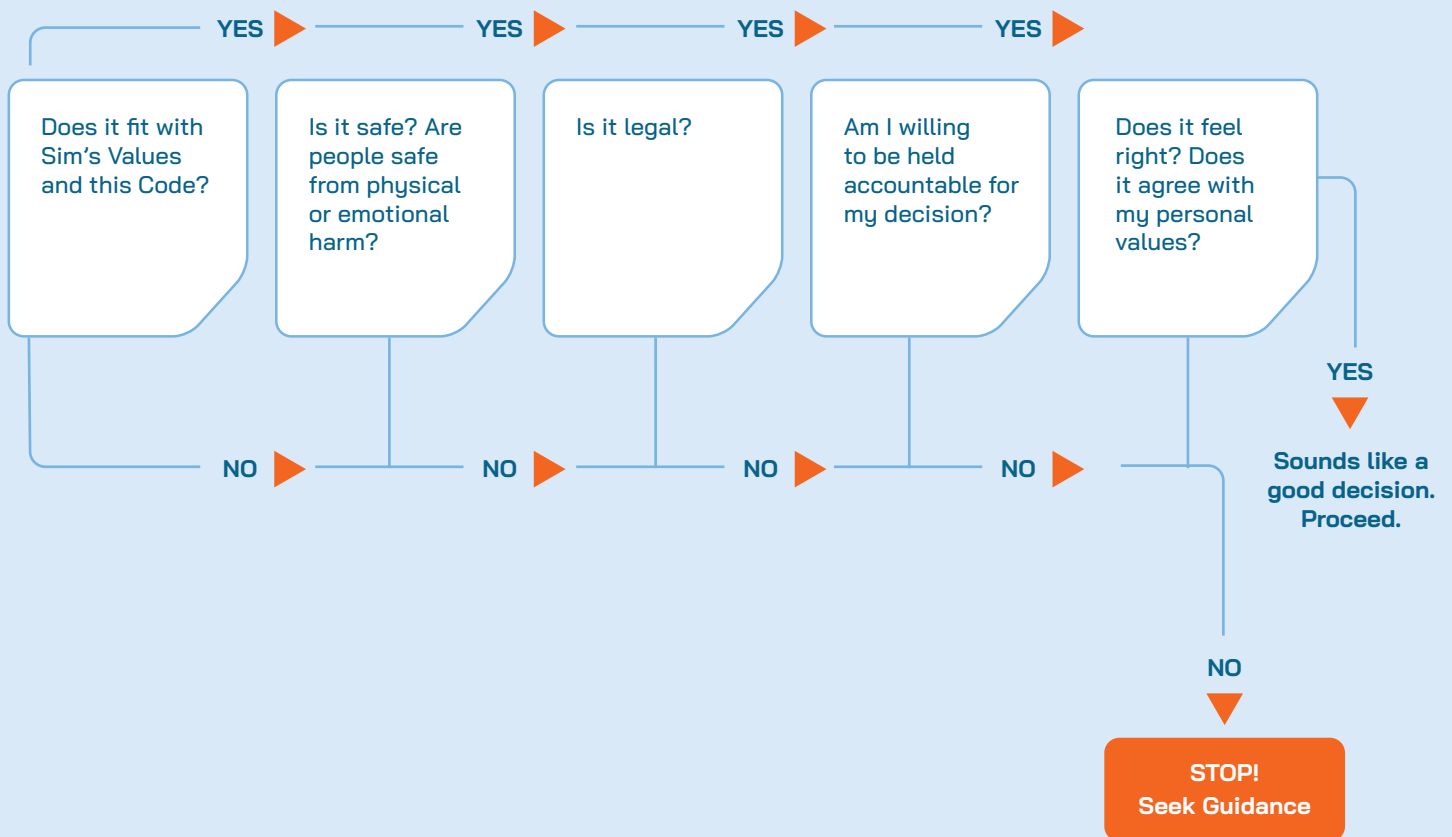
Our Code provides guidance for common situations we may face, but it cannot cover everything. Sims has resources that can help us, but our best resource is our judgment and our knowledge of Sims' values and purpose.



# When facing a tough decision:

- ✓ PAUSE and THINK about the best approach.
- ✓ CONSIDER if it aligns with our Code, Values, policies and the law.
- ✓ ASK for help if you're unsure.

Use this quick business conduct test:







# Report Concerns and Seek Guidance

If we have concerns or need guidance, Sims offers resources to support us.

We can choose the option that feels most comfortable. Sims prohibits retaliation, so there is no risk in sharing your identity, which can assist in investigations. Your identity will be protected. Sims expects us to stop unsafe or illegal activities as soon as we know about them. We can do this directly or we can report them in line with our Whistleblower Policy.

**Working together we can live our Code.**

## CONSEQUENCES OF BREACHING OUR CODE

A breach of our Code is serious and can lead to significant reputational, legal, and financial consequences, including:

- ✓ Disciplinary action or termination,
- ✓ Termination of relationships with suppliers,
- ✓ Reporting to law enforcement,
- ✓ Legal action, and
- ✓ Civil or criminal penalties.

## RELATED POLICIES

- ▶ [Sims' Whistleblower Policy \(View\)](#)





# Safety First: Protecting People, Communities, and the Environment

At Sims, safety comes first—for our people, the communities we serve, and the environment. We follow strict safety controls and procedures, actively participate in risk assessments, and report hazards immediately. If an activity is unsafe, we stop it.

We stay clear-headed at work, avoiding alcohol, drugs, or medications that impair judgment. Smoking is allowed only in designated areas due to fire risks. If medication affects our focus, we report it to HR and our manager.

We encourage you to seek professional fitness for work help if you or a colleague is having difficulties. Sims utilises Critical Control Verifications and Safety Standards to mitigate risks.

We follow traffic controls, conduct equipment checks, and report safety concerns and injuries, illnesses, hazards, near misses and actual events to ensure everyone goes home safely.

Our commitment extends to environmental protection, reducing waste, and preventing pollution. Compliance failures don't just impact Sims—they affect our coworkers and the communities we operate in.

Health and safety issues and concerns can also be reported anonymously via our reporting hotline.



## TAKING RESPONSIBILITY FOR SAFETY

During a blade change, a Maintenance Technician noticed a faulty weld. A co-worker dismissed it, saying it could wait for the next downtime.

Uncomfortable with this response, the Technician reported it to their Manager, who addressed the repair and reinforced the importance of addressing safety issues immediately. The co-worker admitted the mistake and committed to taking safety more seriously in the future.



## VIOLENCE IN OUR WORKPLACE

Safety at work means more than preventing accidents—it includes protection from violence. Sims has zero tolerance for unauthorised weapons on-site. However, conflicts can escalate even without weapons, sometimes involving visitors or personal situations.

We stay in control of our emotions and de-escalate tense situations. If a situation gets out of hand, we call police rather than intervening, as doing so can make things worse.

## RELATED POLICIES

Environmental Health & Safety (EHS) SharePoint houses the following:

- ▶ [Sims' Environmental Health & Safety EHS Policy \(View\)](#)
- ▶ [Sims' Environmental Health & Safety EHS Management System Guide \(View\)](#)
- ▶ [Sims' Safety EHS Standards](#)



# Treat Each Other Well

At Sims, we treat everyone—colleagues, contractors, suppliers, and customers—with respect. We embrace diverse perspectives and create an inclusive environment where everyone’s contributions matter.

Discrimination, harassment, bullying, or intimidation have no place here. Hiring and promotions are based on skills and experience, not personal characteristics. We work with the best, valuing differences and upholding fairness.

We treat others as we want to be treated, ensuring a workplace free from offensive or disruptive behavior.

This applies at work, during business travel, in company-provided accommodation, at work-related events, and online.



**BULLYING** is repeated unreasonable verbal, physical, social or psychological behaviours directed towards an individual or group of people at work, which creates a risk to health and safety.

**DISCRIMINATION** is adverse treatment of an individual or group, based on specific attributes which may include but are not limited to race, gender identity, sex, age, origin, ethnicity, sexual orientation, transgendered status, disability, marital and civil partnership status, religion, political opinion, pregnancy or family responsibility.

**HARASSMENT** is an action or behaviour viewed as unwelcome, humiliating, intimidating or offensive by the recipient.

**SEXUAL HARASSMENT** is unwanted or unwelcome conduct of a sexual nature, which makes a person feel offended, humiliated and/or intimidated.

**VICTIMISATION** is subjecting a person to a detriment or threatening to subject a person to a detriment because that person has made a workplace complaint or concern or has supported someone else in doing so.

## RELATED POLICIES

- ▶ [Sims’ Diversity, Inclusion & Equal Employment Opportunity Standard](#)
- ▶ [Sims’ Human Rights Policy \(View\)](#)
- ▶ [Sims’ Diversity Policy \(View\)](#)
- ▶ [Employee Handbook Policies and Standards](#)





# Behave Ethically

## BE HONEST AND TRANSPARENT

We uphold integrity, transparency, and respect in everything we do. This means handling situations openly, refusing bribes and kickbacks, and seeking guidance when unsure.

## DEFEND AGAINST BRIBERY & CORRUPTION

Bribery and corruption are illegal and undermine fairness. We maintain honesty in all dealings, with zero tolerance for unethical behavior—whether from ourselves, colleagues, or others that represent Sims.



A Sims employee was inspecting a load of ferrous goods from a supplier when they noticed non-metal material and began to deduct for it. The supplier then offered money to avoid the deduction. The employee refused the offer, recorded the full deduction, and recognised accepting the bribe would be illegal and could cost them their job.

# Openly Discuss Potential Conflicts of Interest

## DISCLOSE POTENTIAL CONFLICTS OF INTEREST

We expect you to always act in the best interests of Sims and to avoid conflict with those interests.

Conflicts of interest can arise, but Sims can usually address them. It's crucial to disclose any potential conflicts as soon as we become aware of them and comply with any requirements set by Sims.

## IDENTIFY CONFLICTS

A conflict of interest occurs when we must choose between doing what's best for Sims or benefiting ourselves or a related party.



## ASK YOURSELF

Could your actions be seen as benefiting you, your family, close friends, or a business associate at Sims' expense? If the answer is "YES," your actions may create a conflict of interest.



## AVOID CONFLICTS

At all times, whether on or off the job, your actions should not conflict with your responsibilities to Sims. For example, you should avoid:

- ✓ Personal investments in companies that could impact your decisions on behalf of Sims.
- ✓ Accepting personal benefits from third parties bidding for or seeking to retain Sims' business.
- ✓ Involvement in decisions related to family or close friends in Sims' business relationships.
- ✓ Participating in hiring or recruiting when the candidate is a family member or close friend.
- ✓ Accepting roles, board positions, or advisory positions with competitors or suppliers if it could affect your judgment regarding Sims.
- ✓ Entering into workplace relationships without disclosure, especially if there is a power imbalance.

## DECLARE AND RESOLVE CONFLICTS

If you become aware of an actual, potential, or perceived conflict of interest:

- ✓ Remove yourself immediately from the relevant activity.
- ✓ Promptly inform your line leader and work with them to resolve the issue.

Conflicts can often be resolved through open, honest discussion. If you're unsure how to proceed, consult a senior leader or the appropriate function representative (e.g., HR or Legal).

## DOCUMENT THE OUTCOME

Submit your conflict-of-interest declaration with accurate information and supporting documents. Your line leader will review and record the resolution, including whether you can continue activities involving the conflict.

Suppliers must also declare any conflicts and, if necessary, seek Sims' consent before proceeding.

## RELATED POLICIES

- ▶ [Sims Conflict of Interest Policy](#)
- ▶ [Sims' Anti-Bribery, Anti-Corruption and Anti-fraud Policy \(View\)](#)
- ▶ [Employee Handbook](#)





# Build Relationships Responsibly

Sims may need us to help build and strengthen its business relationships by taking people out for meals or entertainment. We do this so we can discuss business opportunities, celebrate an accomplishment with our team, give gifts for holidays, etc. We choose locations and gifts that are appropriate, allowed by law, and not intended to influence the recipient.

We submit the costs related to these types of expenses promptly with detailed receipts, reporting who received the gift or attended the event, and the business reason behind it. There may be local limitations and requirements, so we make sure we know these policies and procedures and make sure we meet them.



When planning entertainment at a minimum we consider these things:

- What do our policies say about what is acceptable?
- Would I spend this much per person if it were my money?
- How many drinks can we have and still act professionally and get home safely?
- Would I be comfortable telling my spouse or mother about the night's activities?
- Have we already done this recently with this supplier/customer/employee group?

A Sims' employee wanted to thank their team for their hard work during the year. The employee booked a new restaurant that they had wanted to try and more expensive than appropriate for a business lunch. The lunch was far more expensive than the employee was personally willing to spend.

**What is wrong in this scenario? It is positive to thank your team for hard work. However, it is not appropriate to take the team for an expensive a lunch at Sims' cost.**

## RELATED POLICIES

- ▶ [Related Policies & Standard Operating Procedures \(SOPs\)](#)
- ▶ [Sims Anti-Bribery & Anti-Corruption & Anti-Fraud Policy \(View\)](#)
- ▶ [Sims Travel Policy](#)

SOPs or Guidelines including but not limited to:

- Travel
- Entertainment
- Gifts & Donations





# Treat Sims' Sensitive Information with Care

Our jobs at Sims sometimes require us to handle sensitive information. This includes Sims' financial performance, business plans, sales and purchasing information, etc. We treat all such information confidentially.

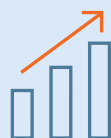
Before sharing sensitive or confidential information we know that we must get appropriate approval. This is especially important when it involves third parties. We recognize that even with the best of intentions, sharing sensitive business information can hurt Sims. We never use information we learn through our work at Sims for our personal benefit.

## SEEK GUIDANCE WITH EXTERNAL COMMUNICATIONS

As a publicly traded company on the Australian Securities Exchange (ASX), Sims has requirements around what it reports and when. It is also true that what people hear about Sims can significantly affect our business. Because of this, we recognize that the best way to handle talking with outsiders like regulators, law enforcement and journalists is to leave it to the experts. If we are contacted by:

- **REGULATORS:** We refer them to Group Chief General Counsel;
- **LAW ENFORCEMENT:** We refer them to our supervisor; and
- **REPORTERS OR ANYONE ELSE:** we refer them to the Corporate & Government Affairs Department.

There may be times when our supervisor asks us to talk with third parties about Sims. This could be for an audit or investigation. When this happens, we cooperate fully. If we are asked about something we think might be sensitive, we ask our manager for guidance before answering.



Sims is listed on the Australian Securities Exchange (ASX). We are legally required to notify the ASX of any information about Sims that might affect the price or value of our shares before we can share the information with anyone else.

When we have questions about whether or not we can share something, we ask our line manager, who may need to ask the Group Chief General Counsel just to be sure.

## RELATED POLICIES

- ▶ [Shareholder Communications Policy \(View\)](#)
- ▶ [Market Disclosure Policy \(View\)](#)
- ▶ [Communications and External Engagement Policy \(View\)](#)



## NEVER TRADE ON INSIDE INFORMATION

We do not trade in Sims' stock based on information we know because we work at Sims or give the information to someone else so they may buy or sell it. Doing so would create an advantage that other shareholders do not have. It is insider trading and is illegal.

### RELATED POLICIES

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► [Dealing in Sims Securities Policy \(View\)](#)



## PROTECT CONFIDENTIAL INFORMATION

Sims' reputation and competitive advantages rely on our ability to protect its confidential, commercial and proprietary information.

This includes anything that could violate laws or contracts, or harm Sims' competitive advantage if other people learned about it. Examples include

- ✓ Sims' current purchase or sales deals and pricing lists of suppliers or customers,
- ✓ Sims' strategy for growth, and technology or procedures Sims is developing or has paid someone to develop.

We continue to protect this information even after we leave Sims.

## WORKING REMOTELY

We are aware that when we work at locations outside of the office there is increased risk that Sims' sensitive information could be accessed by others, and we are always vigilant.

Working at coffee shops, airplanes, hotels, a relative's house, even our own home can be risky if we don't take steps to protect Sims' sensitive information. WiFi networks are insecure so we always use the Sims-approved virtual private network (VPN) when we access them. We are aware of our surroundings and shield what is on our screen so others cannot see it. We seek a private location where we cannot be heard when we need to take business calls in public, or we reschedule them for a time when we can be in our standard work environment.

### RELATED POLICIES

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► [IT Acceptable Use Policy](#)



# Represent Sims with Pride and Integrity

Sims is committed to more than simple compliance with the various laws and regulations to which we are subject. The choices we make in our roles at Sims must align with Sims' purpose and values.

## COMPLY WITH LAWS AND REGULATIONS

Sims respects the laws and regulations of the countries and regions in which it operates. As representatives of Sims, we must always act honestly and ethically. This means following all laws and regulations that cover Sims' business activities.

This Code gives us guidance on some of the requirements that are most relevant to the Company's business activities. Not every requirement can be included in this Code. We must ensure we meet all requirements, even those not explicitly listed. If we have any questions about what we need to do, we reach out to our Legal Department.

If we fail to meet the legal requirements, it can result in serious consequences, such as loss of employment, levying of fines, and even possible imprisonment. Even the appearance of illegal, dishonest or inappropriate behavior can have a negative impact on Sims and us.

Below are highlighted some of the key regulatory areas in which Sims operates.

## PROTECT DATA PRIVACY

We always keep personal data confidential. We capture and use it only to the extent necessary to conduct business and to meet regulatory requirements. We respect the privacy of employees, suppliers, customers, etc. and ensure this information is captured and stored correctly.



Personal information is any information that would tell someone who an individual is (for example, name or national identification number) or would allow them to be identified (for example, personal address, physical traits, bank account number). This information must be managed in a professional and ethical manner and in accordance with governmental requirements.

Personal data must be used only for purposes authorised by the Company. Such information should be handled and communicated with care and must not be disclosed outside of the Company without proper authorisation.

## RELATED POLICIES

▶ [Global Data Privacy Policy \(View\)](#)





## CONDUCT BUSINESS WITH GOVERNMENTS TRANSPARENTLY

Sims conducts various business with government employees. Sims does not give bribes, and its personnel need to be very careful to avoid the appearance of offering one. It can be a difficult path to meet cultural expectations while avoiding the appearance of an attempt to sway a person's judgement. Personnel concerned about whether a gift is acceptable should consult the legal department.

### RELATED POLICIES

- ▶ [Anti-Bribery, Anti-Corruption and Anti-Fraud Policy \(View\)](#)

## PREVENT ANTI-COMPETITIVE PRACTICES

Sims will compete vigorously but fairly, complying with all applicable laws protecting competition. This means we will not enter into anti-competitive agreements or engage in misleading or deceptive conduct. In short, anti-competitive conduct and misuse of market power to damage competitors would breach these laws and will not be tolerated.



### POSSIBLE ANTI-COMPETITIVE BEHAVIORS:

- Talking with a competitor about how much Sims or the competitor bid for a project.
- Coordinating with a competitor to charge the same price so we both pay less for metal.
- Discussing business strategy (our or theirs) with someone who works for a competitor.

### RELATED POLICIES

- ▶ [Anti-bribery, Anti-corruption and Anti-fraud Policy \(View\)](#)

## AVOID CONTRIBUTING TO THIRD PARTY CRIMINAL ACTIVITIES

Sims will not support criminal activities, such as accepting stolen goods or helping to hide the source of money gained through illegal means. Sims has developed controls and procedures to comply with regulations governing such criminal activities. We must follow them to ensure Sims' does not inadvertently violate the law and aid in criminal activity.

Sims does not accept certain high-risk materials without proper certification or vehicles without proper title. Sims also gathers required information on suppliers to be provided to law enforcement as needed.

If we violate these regulations, Sims will treat it as a breach of our Code of Conduct and could result in termination. We could also face criminal charges, fines, and imprisonment.

### RELATED POLICIES

- ▶ [Metal Theft Policies](#)



### POSSIBLE SIGNS OF CRIMINAL ACTIVITY:

- Non-certified supplier attempting to sell bronze plaques or figures.
- Casual supplier attempting to sell copper wire, copper piping, manhole covers
- Supplier selling a vehicle without a proper title.
- A supplier requesting a check made out to a name other than the one in Sims' system.
- A supplier who brings multiple loads throughout the day, cashing in tickets each time, but selling Sims significant amounts overall, or who splits up tickets for loads from the same day so they get paid less than US\$10,000 each day.
- When you see these behaviors, capture as much information as possible about the supplier and contact your manager. Do not purchase the goods or split up the payments. Sims may want to report such activity to the police.

A Sims employee was working in the non-ferrous yard when a casual supplier came in with copper wire to sell. The copper wire was high quality, on a large spool and looked new. When asked by the employee about the source, the supplier replied that someone had thrown it out.

**The employee became concerned that this was stolen material and briefed the supervisor on the situation. The supervisor advised not to purchase the copper wire and contacted local law enforcement. The employee's careful observation and quick action prevented Sims from breaking the law by buying stolen goods.**



## RESPECTING HUMAN RIGHTS

We comply with all laws and regulations protecting human rights, and we follow the processes Sims has designed that prevent us from negatively impacting the rights of Sims' employees and the communities in which we operate.

Some violations of human rights rise to the level of modern slavery. We share Sims' zero tolerance for modern slavery in our operations and understand it is our responsibility to help identify risks of modern slavery in our operations and supply chain.



### SOME RED FLAGS OF POSSIBLE MODERN SLAVERY VIOLATIONS YOU MIGHT SEE:

- Unsafe working conditions at a supplier's site.
- Contract workers being dropped-off and picked-up as a group.
- Multiple employees or contract workers living at the same address.
- Multiple employees or contract workers with the same bank account.
- People who consistently are not dressed appropriately for the weather or job.
- People with injuries they try to conceal.

If you see a red flag, do not approach the person. You could put them at risk, or tip off the bad actors, removing the opportunity to help. Instead, contact your site supervisor or HR with your concerns.

## INFLUENCE PUBLIC POLICY TRANSPARENTLY

We recognize that regulatory changes can greatly impact Sims' business activities. We are sometimes asked to share information and opinions with governments on issues that affect the company. We often do this through a third party, like a trade association or lobbyist, but we may also do this directly.

We are aware that many jurisdictions have laws restricting political donations. We check with the Corporate and Government Affairs team or Legal Department before making contact with any government official so that we do not overstep any of these requirements.

We know that the Company may contribute to political parties when permissible under applicable law. Similarly, charitable donations may only be made by Sims if they are legal and are intended to help the communities in which we live and work. We make sure that all contributions or donations are made with the prior approval of our Corporate and Government Affairs team, which maintains a record of these donations and contributions and completes all necessary filings.

## RELATED POLICIES

- ▶ [Anti-bribery, Anti-corruption and Anti-fraud Policy \(View\)](#)

## RELATED POLICIES

- ▶ [Human Rights Governance \(View\)](#)
- ▶ [Human Rights Remediation Process \(View\)](#)
- ▶ [Whistleblower Policy \(View\)](#)
- ▶ [Supplier Code of Conduct \(View\)](#)





## OBTAIN LEGAL REVIEW AND APPROVAL FOR CONTRACTS

When we sign a contract in Sims' name, we commit the company to its terms and conditions. We know that there can be problematic or contradictory language in the contracts we are given for signing, and that such language may expose Sims to unnecessary risk and obligation. We make sure all contracts have been approved by Legal prior to signing them.

Legal is responsible for establishing policies and procedures around contract management. We are responsible for following the steps and guidelines that Legal provides because we know it is in the best interest of Sims.

## Protect Sims' Assets

### MAINTAIN ACCURATE BOOKS AND RECORDS

We recognize that Sims' books and records include more than just its accounting transactions. The books and records also include non-financial information like personnel files, environmental and safety documentation, external reporting and filings, etc.

Management establishes policies and procedures that create strong internal controls. We must comply with those policies and procedures, including the timely destruction of out-of-date documents.

### RELATED POLICIES & RELATED STANDARD OPERATING PROCEDURES (SOPs)

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- ▶ [Group Finance Policies & SOPs](#)
- ▶ [Group Record Retention Policy & SOPs \(View\)](#)



### USE SYSTEMS RESPONSIBLY

Sims provides us with many different systems to help us conduct business. We use these systems responsibly and only in support of Sims' business, not for our personal interests.

We protect Sims' information and systems. We use equipment with care and protect it from theft or abuse. If the equipment is lost or stolen, we inform the Information Technology (IT) department immediately. We do not share login and password or other access data with others, even other employees, because we understand that access restrictions are key to protecting Sims' information and systems.



We diligently assess external email for potential malware, phishing and other attempts. We are alert to violations of laws involving these systems, including unlawful copying of software for personal use, copying or communicating confidential data without authorization or in an unsafe manner, and report such activity (e.g. to our manager or IT) as soon as we learn of it.

We understand that the Company's electronic communications systems are the property of the Company, and all electronic communications are Company records. We have no expectations of privacy around anything we do using Sims' systems.

We are aware that Sims reserves the right to monitor and log our use of its information systems, including, but not limited to email, internet access, mobile phone use, telephone use, files contained on file servers and Company business applications. We recognize that this applies even when we are working remotely.

## RELATED POLICIES

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- ▶ [IT Acceptable Use Policy](#)



# Thoroughly and Objectively Investigate Concerns

Sims takes very seriously any reports of potential violations of law and this Code. We recognize the importance of responding to reports of violations quickly and professionally and are committed to doing whatever Sims needs to make this happen. Sims has zero tolerance for retaliation.

If we need to report a concern or ask a question, we can reach out to:

- Our manager or supervisor
- A different manager or supervisor
- Our local Human Resources department or Sims Group Chief Human Resource Officer
- Sims' Group General Counsel
- Sims' Global Head of Assurance
- Sims' Hotline ([www.simshotline.com](http://www.simshotline.com))
- We may file electronically using the website or
- If we prefer to call in, we can find local toll-free phone numbers on the hotline website.



## REPORT IN YOUR NATIVE LANGUAGE

Sims knows that speaking up is difficult and wants to make the process as easy as possible for us. That is why our hotline speaks our languages. Whether we call or use the website we can ask for the language we prefer.

# Code Administration

Sims must obtain prior approval of our Board of Directors before making changes to this Code. Only the Board may waive compliance with this Code, and they must do so in writing.





