

## Modern Slavery

Statement on slavery and human trafficking for the financial year ended 30 June 2020.

At Sims Group UK Limited ("**Sims UK**") we are committed to improving our practices to combat slavery and human trafficking. This statement sets out what we are doing to assess and mitigate the risk of slavery and human trafficking in our business and our supply chain.

### OUR ORGANISATION

Our ultimate parent group company **Sims Limited** ("**Sims**" and/or "**Group**") is one of the world's leading publicly listed Environmental services conglomerate, with a focus on recycling, energy recovery and reuse of electronics, with circa 250 facilities, including joint ventures operations, in 18 countries, and more than 5,000 employees globally. Sims's purpose is to create a world without waste to preserve our planet, and we are committed to closing the loop on recycling for a more sustainable future. For the financial year ended 30 June 2020, Sims had an annual global turnover exceeding AUD\$6 billion<sup>1</sup>. Sims has two business trading divisions operating in the United Kingdom, under the marketing brand names: **Sims Metal Management** ("**UK Metals**") and **Sims Lifecycle Services** ("**UK SLS**").

**UK Metals** is one of the leading metals recyclers in the UK operating 33 facilities across the United Kingdom, with 650 employees. Our metals business involves the buying, processing and selling of ferrous and non-ferrous recycled metals. For the financial year ended 30 June 2020, UK Metals had an annual turnover exceeding AUD\$1 billion<sup>1</sup>.

**Sims Lifecycle Services** ("**SLS**") is a global leader in electronics reuse and recycling, with 28 facilities across 16 countries, including the United Kingdom, and 1,420 employees across the world. SLS provides disposition services for all types of retired electrical equipment to local, national and global customers in a wide variety of business sectors. For the financial year ended 30 June 2020, SLS had an annual global turnover exceeding AUD\$750 million<sup>1</sup>, including UK SLS turnover in excess of AUD\$29 million<sup>1</sup>.

### OUR POLICIES

#### Human Rights Policy

Sims Metal Management is committed to respect, promote and uphold fundamental Human Rights in the way we conduct our global business. These rights are set out in the UN Declaration of Human Rights and further defined for business in the OECD Guidelines for Multi National Enterprises. We recognize our role and responsibilities within our sphere of influence and will endeavour to avoid being complicit in or encouraging any activities that may result in Human Rights abuses and will keep abreast of developments in acceptable

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<sup>1</sup> All amounts are in Australian Dollars ("**AUD**"), Sims's reporting currency.

standards of human rights, such as safety in the workplace. As a minimum, we will comply with all applicable local laws, regulations and standards of the countries in which we operate, but will strive to achieve levels of performance which exceed basic compliance.

We are specifically committed to the prohibition and elimination of child and forced and compulsory labour throughout the communities in which we operate. We will endeavour to the extent of our ability not to support products that rely on inappropriate labour processes. Sims' Human Rights Policy is available on its website at <https://www.simsmm.com/investors/governance/>.

### **Code of Conduct**

Our Code of Conduct includes a commitment to respect each other's rights, both within our organisation and in our relation with all our stakeholders.

### **Whistle Blowing Policy**

Our Whistle Blowing Policy and procedures enable employees, contractors and suppliers to report any concerns about modern slavery, human trafficking and any other human rights violations. There were no reports relating to modern slavery made via our whistle blowing hotline or other reporting channels during the financial year ended 30 June 2020.

### **DUE DILIGENCE PROCESS**

As part of our diligence process, we identify and mitigate risk we have in our supply chain, including:

- Have robust 'know your customer and supplier' procedures.
- Have appropriate contractual terms with our suppliers.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

To ensure all those in our supply chain and contractors comply with our values we have a supply chain compliance programme, with involvement from the following departments: Legal, Internal Audit & Compliance, Human Resources, Procurement and Sales.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff on our Code of Conduct, Human Rights and Whistle Blower policies.

This Group statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Sims UK slavery and human trafficking statement for the financial year ending 30 June 2020.



**Paul Wright - Managing Director - Sims Group UK Limited**

July 2020