



BIODIVERSITY POLICY

1. OUR COMMITMENT

Sims Metal Management (SMM) recognizes the importance of preservation of habitats and ecosystems to ensure biological diversity for future generations. As a recycler of ferrous, non-ferrous, electronics and other materials, we operate facilities globally in large urban and industrial areas. The very nature of our core business supports the global imperative of conserving materials and resources through recycling and re-use, thus contributing to the broader preservation of the environment and biodiversity.

We recognize the management of biodiversity as fundamental to our public responsibilities. As a minimum, we will comply with all applicable biodiversity laws, regulations and standards of the countries and communities in which we operate, but will strive to achieve levels of performance which exceed basic compliance.

2. OUR POLICY

We will strive to manage all our sites, operations and activities so as to:

- Ensure compliance with all biodiversity protection licensing conditions and regulations;
- Ensure the effective management and discharge of surface water to reduce impact on local ecosystems;
- Ensure that new facilities are planned, assessed and operated so that they meet the applicable governmental biodiversity requirements;
- Evaluate and report on biodiversity where applicable and relevant;
- Incorporate biodiversity into all relevant business decision making, including acquisition activities;
- Ensure that no operational activities are commenced without due consideration of their potential impact on biodiversity and appropriate mitigation measures employed; and
- Respect regional conservation strategies and work with local authorities regarding the protection of local areas wherever applicable.

3. OUR SUPPORT

We are committed to supporting all of the above through effective leadership, communication, procedures, management systems, training and accountability at all levels, including a SHEC approval of all applicable capital expenditure requests, and making employees and contractors aware of this policy, its impact on them and on the reputation of our business. We will maintain a system and culture of sharing best practices, and lessons learned with regard to SHEC matters with all facilities globally. This policy will be reviewed regularly in accordance with the Charter of the SHEC Committee of the SMM Board of Directors.