



HUMAN RIGHTS POLICY

1. OUR COMMITMENT

Sims Metal Management (SMM) 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 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 operates, but will strive to achieve levels of performance which exceed basic compliance.

2. OUR POLICY

Details of our commitment to Human Rights are specifically addressed in the SMM Code of Conduct and include specific policies for the protection of rights for employees, including:

- The **Right to Equal Opportunity and Non Discrimination**, regardless of ethnicity, gender, religion, age, sexual orientation, health status or other such protected classifications.
- The **Right to Security of Persons**, including protection against improper and unlawful harassment and protection against retaliation for employees who report non-conformance with government regulations, company policies and codes of conduct.
- The **Right to a Safe and Healthy Workplace**, for each and every employee regardless of status.
- The **Right to Competitive Remuneration**, supporting the concept of competitive pay for work performed.
- All other **Legal Rights** in respect of the workplace granted to our people in the regions in which we operate.

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.

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.