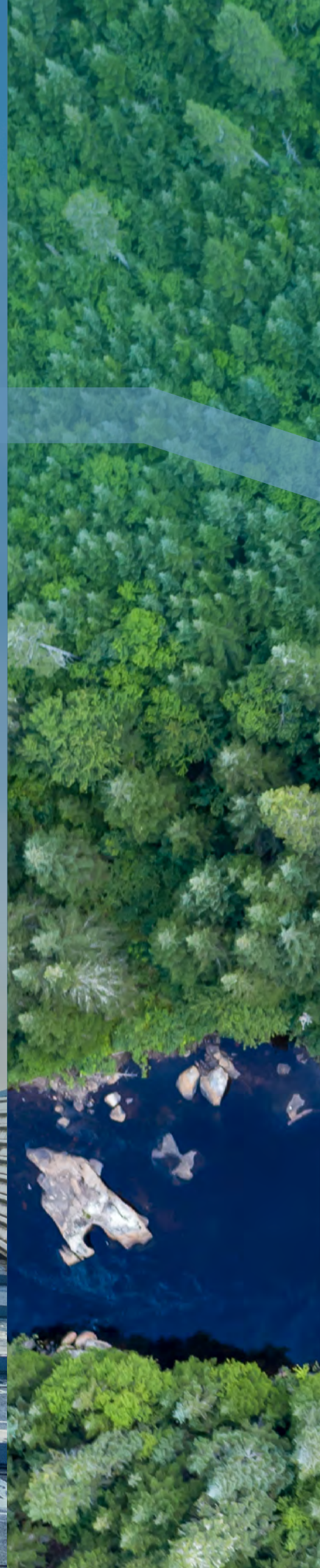


ENABLING DECARBONISATION



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ACKNOWLEDGEMENT

Sims Limited acknowledges the First Nations people of the lands where we live and work. We recognise their continuing connection to land, waters and culture. We pay our respects to their Elders, past and present.

FORWARD-LOOKING STATEMENTS

The material contained in this document is a presentation of information about the Sims Limited business portfolio's current activities at the date of the close of the reporting period, 30 June 2022. It is provided in summary form and does not purport to be complete.

It should be read in conjunction with Sims Limited's periodic reporting and other announcements that have been lodged with the Australian Securities Exchange (ASX). To the extent that this document may contain forward-looking statements, such statements are not guarantees or predictions of future performance and involve known and unknown risks, uncertainties and other factors – many of which are beyond the control of the business portfolio – and may cause actual results to differ materially from those expressed in the statements contained in this release.

This document is not intended to be relied upon as advice to investors or potential investors and does not take into account the investment objectives, financial situations or needs of any particular investor.

SUSTAINABILITY REPORTING SUITE

Sims Limited's sustainability reporting suite, which includes the FY22 Sustainability Report, Climate Report, Sustainability Databook and the 2021 Modern Slavery Statement, is available at www.simsltd.com/sustainability. All reporting for the period from 1 July 2021 through 30 June 2022 was done according to the Global Reporting Initiative (GRI) Standards, and the GRI index is available in the Sustainability Databook. The Annual Report and statement of financial results are available at www.simsltd.com/investors. All currency amounts are in Australian dollars.



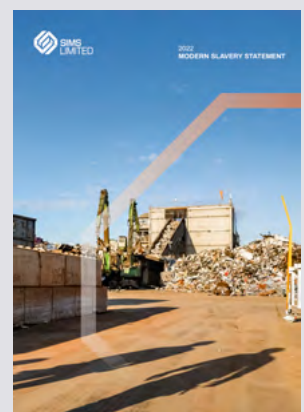
**SUSTAINABILITY
REPORT FY22**



**CLIMATE REPORT
FY22**



**SUSTAINABILITY
DATABOOK FY22**



**MODERN SLAVERY
STATEMENT FY22
(DECEMBER 2022)**

Chair statement

Our purpose, create a world without waste to preserve our planet, guides our strategy and how we approach our operations, which includes our action on climate change.



This report is our first dedicated climate report, and it marks a new phase in Sims Limited's climate ambition and governance approach. Building on the company's Task Force on Climate-related Financial Disclosures (TCFD) Report, which was released in FY21, this FY22 Climate Report shows how we integrate climate-related considerations into our approach to governance, strategy and risk management, as well as the progress we've made toward our targets.

Over the past year, we have acknowledged the release of the Intergovernmental Panel on Climate Change's Sixth Assessment Report. It confirmed that the actions made during this decade will determine whether warming is limited to 1.5°C above pre-industrial levels and if the most severe impacts of climate change are prevented. Since the release, we have elevated our ambitions on combating climate change, reflecting both the urgency of action needed to address this shared global challenge, as well as the opportunity presented by the transition to a low-carbon circular economy.

The circular economy is essential to limiting global warming. The Ellen MacArthur Foundation noted that the transition to renewable energy, complemented by energy efficiency, can only address 55 percent of global emissions. The remaining 45 percent comes from producing the cars, clothes, food and other products we use every day, and it is imperative to tackle these emissions to limit global warming.¹ Particularly for emissions-intensive industries, such as steel, aluminium and other metal-producing industries, moving to greater circularity by maximising use of high-quality scrap inputs – such as those supplied by Sims Metal – is a vital pathway to reducing emissions in commodities that are essential to low-carbon infrastructure.

This climate report confirms that Sims Limited is well placed to capture these opportunities. By growing our diversified circular businesses, we will maximise shareholder returns, reduce volatility associated with the commodity cycles, and contribute to lowering our customers' and society's emissions.

The Board of Directors and I actively manage these opportunities and risks for Sims Limited and the company's stakeholders, and we will oversee the execution of the measures outlined. As we execute the climate strategy, our aim is to ensure that we deliver long-term sustainable value for our shareholders.

Last year, we announced our intention to provide shareholders with the opportunity for a non-binding advisory vote on the company's Climate Report at the 2022 Annual General Meeting. In this report, we set out our climate transition action plan, and we hope to gain your support for the climate transition approach we have described.

We will continue to publish an annual climate report, including the progress we make toward our targets and action plan. We invite your feedback on these actions, ideas and issues outlined in this report. Every three years, we will provide shareholders with an opportunity for a non-binding advisory vote to endorse the ambition set before them. The Board recommends that you vote in favour of the non-binding advisory resolution on the 2022 Climate Report at the 2022 Annual General Meeting. The resolution can be found in the 2022 Notice of Meeting.

A handwritten signature in black ink, appearing to read 'Geoff Brunson', with a long horizontal line extending to the right.

Geoff Brunson, Chairman

¹ Ellen MacArthur Foundation, "Completing the Picture: How the Circular Economy Tackles Climate Change" (2021)



CEO statement

As the world grapples with the urgency of climate change action, Sims Limited's purpose, create a world without waste to preserve our planet, calls to us even more clearly. Greenhouse gas emissions are a form of waste that causes a critical threat to the preservation of our planet.

Executing the sustainability strategy we outlined in FY19, we will make an increasingly important contribution to global decarbonisation efforts as we progress toward our FY25 goals. This past fiscal year, Sims Metal, our metal recycling business, processed more than 9.7 million tonnes of material and reinjected this tonnage back into the economy, helping to reduce emissions and raw material use. Sims Lifecycle Services (SLS), our business division dedicated to providing circular solutions for technology, launched a sustainability calculator aimed at assisting its customers in understanding the emissions avoided through refurbishing and repurposing cloud hardware. In FY22, SLS repurposed and redeployed 2.7 million cloud units, making progress against our goal to repurpose or redeploy 8.5 million units by the end of FY25.

Sims Energy, our business that produces renewable electricity from landfill biogas, generated 44,000 MWh of renewable electricity – enough energy to power 3,200 homes – in Florida, the U.S. state where this business division is located.² Plans for Sims Resource Renewal (SRR), our new business aimed at closing our own material loops and creating new valuable products for society, continues to advance with our demonstration plant in Rocklea, Queensland, expected to be operational in 2023, and a preferred site selected for our proposed commercial facility in Queensland.

The FY22 Climate Report outlines our efforts to reduce greenhouse gas emissions in our operations and to strengthen the resilience of our strategy in a world impacted by climate change by incorporating climate change considerations into our decision-making. In FY22, we made strides in our approach, including integrating a shadow carbon price in our CapEx and decision-making processes, further considering climate change in our risk management processes, and disclosing the alignment of our industry association memberships with our energy and climate policy.

We are also pleased to report progress on our targets, including an overall emissions reduction of 21 percent compared to our FY20 baseline (market-based). We made

significant progress advancing the purchase of renewable electricity – nearly doubling the amount consumed as compared to the previous fiscal year. In this report, we are also presenting an inventory of the company's emissions in our value chain (Scope 3 emissions), as well as an estimate of the emissions avoided through the use of Sims-processed scrap in secondary metal manufacture.

Climate change presents risks, as well as opportunities. In FY22, physical impacts from climate change continued to be felt – from heatwaves across North America and the United Kingdom to flooding at our Rocklea site in Queensland, Australia, earlier this year. This past fiscal year, we purchased a new site in Pinkenba, Queensland, that will both increase resilience and enable strategic capabilities across our portfolio businesses. We also deepened our analysis on the physical risks of climate change to better prioritise future resilience efforts.

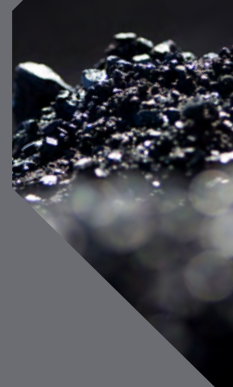
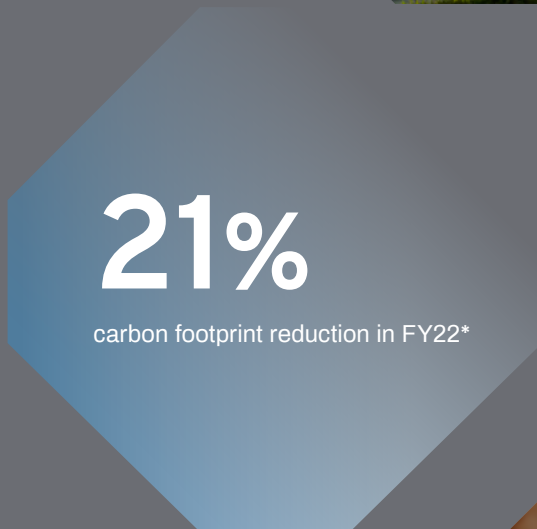
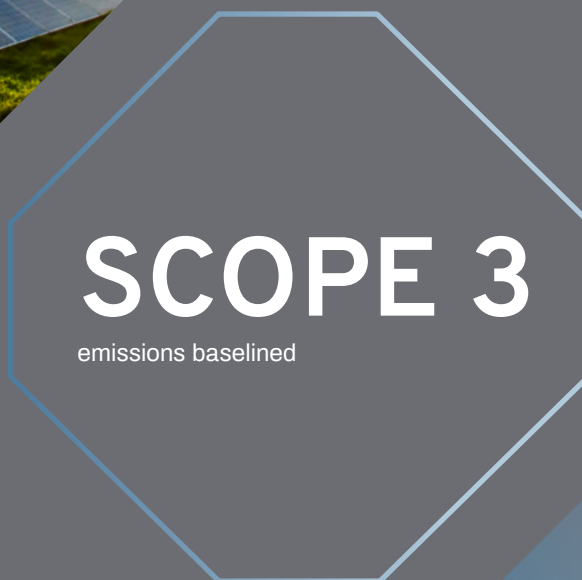
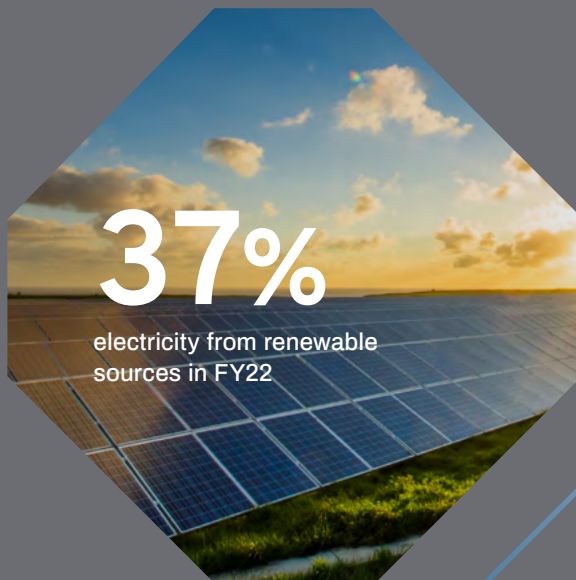
In FY22, we announced increased spending on environmental CapEx, which is in line with our commitment to reduce our environmental impacts. Regulations relating to the environmental impacts of metal recycling operations are becoming stricter. We believe such regulatory changes will benefit the business in the medium to long term, as it reduces those participants with poor environmental practices in the industry.

We have set out an ambitious decarbonisation strategy for our portfolio businesses. We know it will not be easy, but we also know that we must do all that we can to deliver on our commitments to remain in alignment with our purpose. As leaders in the circular economy, we will bring the innovation and expertise that we have honed over the past 105 years to the shared global challenge of climate change.

Alistair Field, Group CEO & Managing Director

² U.S. Energy Information Agency, "Residential Average Monthly Bill by Census Division and State – T5.a, Average Monthly Consumption (kWh), State of Florida" (2020)

CLIMATE HIGHLIGHTS



2022 Carbon
Clean 200 List

Corporate Knights'
2022 World's 100
Most Sustainable
Corporations

* From FY20 baseline;
market-based emissions

OUR STRATEGIC APPROACH

Our strategy and position on climate change

We are pleased to present our inaugural, stand-alone climate report, which covers fiscal year 2022 (the period from 1 July 2021 through 30 June 2022), to shareholders for an advisory vote. The focus of this report is to disclose Sims Limited's climate change, energy and greenhouse gas (GHG) emissions metrics, as well as the risks and opportunities for the company based on the transition to a low-carbon economy and the governance that we apply to these issues. The disclosures in this report incorporate the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).

Our purpose is strong and definitive: Create a world without waste to preserve our planet. In line with our purpose, we acknowledge that climate change is a critical threat to the preservation of our planet and that greenhouse gas emissions are a form of waste.

During the reporting period, the Intergovernmental Panel on Climate Change (IPCC) published the Sixth Assessment Report, which provides the latest knowledge on climate change, the risks it poses to our planet and guidance on how to limit further climate change. The IPCC states that climate change is already causing more frequent and severe

extreme weather events including floods, droughts and wildfires. It also emphasises that limiting warming to 1.5°C above pre-industrial levels is necessary to avoid the most catastrophic physical impacts of climate change, and to safeguard natural ecosystems, human health and societies. As a company, we acknowledge this science and have considered these reports in our strategy and governance. In FY22, we announced new targets for our climate action, which are more ambitious than those we previously released.

GROWING OUR AMBITION

Based on the FY20 baseline, electricity accounted for nearly 50 percent of the portfolio's emissions, and as such, we made a commitment to sourcing renewable electricity for all of our operations by 2025. The remaining portion mainly comes from fossil fuels in our road fleet and mobile plant, and we are pursuing opportunities to displace diesel in our operations. We are also committed to take responsibility for our direct emissions, with a goal of becoming carbon neutral by 2030 – moving this target forward from 2042 – and we remain committed to achieving net zero by 2050.



1 tonne of steel produced from recycled sources avoids

1.5

tonnes of CO₂³



1 tonne of aluminium from recycled sources saves

14,000

kWh of energy and 40 barrels of oil⁴

³ IEA, "Energy Technology Perspectives 2020"

⁴ IEA, "Iron and Steel Technology Roadmap" (October 2020)



SIMS METAL AND LOW-EMISSIONS STEEL

Steel production accounts for 7 percent of global emissions, and 28 percent of industrial emissions. Demand for steel is expected to continue rising (up to 30 percent by 2070, according to the International Energy Agency⁵) to support infrastructure for globally urbanising societies. Steel is also an integral component in the transition to a low-carbon society. Solar panels, wind turbines, dams and electric vehicles all require steel.⁵ Although a formal definition for “green” metal does not exist, lowering the emissions intensity of steel production is a top priority for steel users, producers and governments.

Recycling discarded metal (scrap metal) is an essential part of reducing industry emissions and resource consumption, so Sims Metal has an important role to play in the future of green steel. This is because the business provides high-quality recycled metals in place of virgin materials, which enables the avoidance of emissions, including those associated with extraction, refining and production. When Sims Metal processes discarded metal, it is transformed from waste to a resource that can go directly to a smelter without further processing, ready to be made into new steel. Every tonne of scrap used for steel production avoids the emission of 1.5 tonnes of CO₂, and the extraction of 1.4 tonnes of iron ore, 740 kilograms of coal and 120 kilograms of limestone, compared to producing steel from raw materials.⁶

Steel produced from an electric arc furnace (EAF) emits up to 83 percent less CO₂ per tonne compared to steel from a blast furnace-basic oxygen furnace. An EAF may be charged with up to 100 percent steel scrap. The blast furnace can be charged with as much as 30 percent scrap. With many major steel manufacturers already committing to net-zero targets, we expect the demand for recycled content to increase as steelmakers seek to capitalise on this existing low-emissions input material.

METALS FOR THE LOW-CARBON TRANSITION

The non-ferrous metals that Sims Metal handles, such as aluminium and copper, are also integral for the transition to a low-carbon infrastructure. These metals have carbon-intensive primary production. Producing one tonne of aluminium from recycled sources uses 95 percent less energy than producing it from virgin materials and saves up to eight tonnes of bauxite, 14,000 kWh of energy, 40 barrels (6,300 litres) of oil and 7.6 cubic metres of landfill space.⁷ To further aid in this transition, Sims Metal makes strategic investments to enable the recovery of more non-ferrous metal from discarded metal and develop furnace-ready inputs that minimise intermediate processing. In calendar year 2021, Sims Metal acquired Alumisource Corporation, a metal recycling business that processes discarded aluminium and markets furnace-ready aluminium products, such as Alumishred™, within North America.

Sims Metal will continue to collaborate with customers, industry and government to understand emerging definitions and pathways to “green” metal as part of the portfolio’s growth strategy.

⁵ World Steel Association, “Raw materials: Maximising scrap use helps reduce CO₂ emissions”

⁶ Bureau of International Recycling (BIR)



SCIENCE-BASED TARGETS

Our targets, which cover our Scope 1 and 2 emissions, were developed following the Science-Based Targets Initiative (SBTi) methodology to align with the goals of the Paris Agreement. Targets are considered “science-based” if they are in line with what the best available climate science says is necessary to meet the goals of the Paris Agreement’s ambitious aim to limit average global warming to well below 2°C by the end of the century compared to pre-industrial levels and pursue efforts to limit warming even further to 1.5°C.

The IPCC provides a range of scenarios specifying the annual global GHG emissions that can be emitted to the end of the century to meet the Paris Agreement goals. Sims Limited analysed the 1.5°C scenario to determine the level of operational emissions reductions required to match the same rate at which the world’s emissions must contract to meet this goal (known as the absolute contraction method). Based on our analysis, the emissions reductions associated with our short-, medium- and long-term targets fall within the range of emissions reductions required to be considered aligned with Paris Agreement goals.

As our Scope 3 emissions are more than 90 percent of our total inventory, any target that is formally endorsed by the SBTi must include a Scope 3 emissions reduction target. At the time of writing, SBTi and the steel sector are working to develop science-based, target-setting methodologies, tools and guidance for steel companies and stakeholders. The first public consultation is expected in late 2022 and final publication in the first half of 2023.⁸ As more than 80 percent of our Scope 3 emissions comes from the secondary metalmaking process, our Scope 3 emissions pathway will be heavily influenced by this guidance. We continue to engage with our customers to understand their decarbonisation pathways. For more about emissions in our value chain, refer to pages 26-33.

LEVERAGED FOR THE LOW-CARBON TRANSITION

In response to the decarbonisation of key sectors, such as transportation and energy, and increasing awareness of embodied emissions in the built environment in an increasingly urbanised world, we expect the demand for low-carbon and recycled metal products to continue to grow. Sims Metal, our metal recycling business, is well positioned to help customers by collecting, sorting and processing discarded metal to produce high-quality inputs that are ready to be remade into new metals – an essential component for low-carbon growth.

GROWING OUR POSITIVE IMPACTS

Major events, such as the global COVID-19 pandemic, are highlighting just how increasingly more digitally connected our society has become. From supply chain disruptions to the increased demand for available, critical technology components, the growth in cloud infrastructure accelerated to keep pace with an unprecedented amount of remote workers. Today, these trends are a part of the “new normal.” Businesses and data centres are looking for credible options to keep cloud devices in use for as long as possible, avoiding emissions from the creation of new electronic devices and components. Through Sims Lifecycle Services (SLS), our business that provides solutions to extend the life of data centre technology, we help clients reuse and redeploy cloud assets and articulate the impact of this avoided carbon to their own customers and stakeholders.

Not only does our strategic growth plan focus on the growth of our current business divisions, but it also focuses on new sustainability business solutions that help society move toward decarbonisation and deliver on our purpose. This past fiscal year marked the first year of operation for Sims Energy in the United States, expanding our renewable

energy business built on the expertise of our LMS Energy joint venture in Australia. This business division is based in Florida in the United States, and it generated more than 44,000 MWh of renewable electricity from biogas, which supplied the energy grid with enough energy to power more than 3,200 local homes⁹ and prevented methane gas (a potent GHG) from entering the atmosphere.

Progress on Sims Resource Renewal (SRR), our business that operates within the waste hierarchy to close our own waste loop, continued steadily. We anticipate that SRR's demonstration plant in Rocklea, Queensland, will begin operating early in calendar year 2023. SRR will use the waste generated from the metal recycling process, automotive shredder residue, as the feedstock to create valuable products such as hydrogen and olefins, the building blocks of plastics. Useful by-products will also be created from the hydrogen production process. This includes a vitrified product that can be used in construction materials, and high-purity carbon dioxide that will be captured from day one and could have important commercial applications, including in the food and beverage sector.

DELIVERING VALUE

At Sims Limited, the low-carbon transition is at the heart of our business strategy: Increase our positive impact in the circular economy and take actions to decarbonise our operations and value chain in line with our energy and climate targets. The strategic and scenario analyses we have conducted demonstrate that as an enabler of the global circular economy, Sims Limited is well placed to assist customers in lowering their respective carbon footprints as the world transitions to a circular, low-carbon economy and to deliver on our purpose: Create a world without waste to preserve our planet.



In our direct operations, committed to achieving

CARBON NEUTRALITY

by 2030 and

NET-ZERO EMISSIONS

by 2050 across our portfolio of businesses

⁹ U.S. Energy Information Agency, *Residential Average Monthly Bill by Census Division and State*
– T5.a, Average Monthly Consumption (kWh), State of Florida (2020)

Our strategy, targets and ambitions

Our sustainability strategy is designed to help drive positive impact on our environment and society while creating value for our stakeholders. Our sustainability pillars – operate responsibly, close the loop and partner for change – are the foundation of our sustainability ambitions. We measure our progress with clear targets and goals, which are set for FY25. Each pillar is aligned to one of the United Nations Sustainable Development Goals (UN SDGs) to demonstrate that our actions contribute to a greater collective impact. We selected the three UN SDGs we can impact the most: Decent Work and Economic Growth, Climate Action, and Responsible Consumption and Production. For more details on this strategy, refer to the FY22 Sustainability Report by visiting www.simsltd.com/sustainability.

Our climate action plan is linked with our close the loop pillar, and living up to this pillar will entail addressing all of the goals in our strategy. For instance, developing a skilled workforce, being transparent and creating new circular business models are all essential to achieving our climate action plan.

In FY22, Sims Limited announced new climate action targets in response to the increasing urgency of climate change and the material importance of reducing GHG emissions to our stakeholders. This included a renewable electricity commitment that includes our recognition of the importance of electrification to our decarbonisation roadmap and accelerating our carbon-neutral target to 2030 from 2042. We believe these new targets better reflect the importance of climate action in pursuit of our purpose.

SHORT TERM: 2025

- Reduce absolute emissions by 23% compared to our FY20 baseline
- Use 100 percent renewable electricity
- Achieve carbon neutrality in Sims Lifecycle Services' direct operations

MEDIUM TERM: 2030

- Achieve carbon neutrality in direct operations across the portfolio businesses

LONG TERM: 2050

- Achieve net-zero emissions in our direct operations

SIMS SUSTAINABILITY STRATEGY





SIMS ALUMISOURCE

Sims Metal acquired certain commercial and operating assets of Alumisource Corporation, an aluminium scrap processor that provides unique furnace-ready products across North America, in 2021. The new enterprise was rebranded as Sims Alumisource. The business continues to serve the aluminium and steel industries, strengthening the service offering of Sims Metal North America.

The secondary production process begins with extracting discarded aluminium from waste streams and processing it for recycling. In primary manufacture, aluminium is alloyed with different metals to confer different properties to the end-use product, such as corrosion resistance or tensile strength. This creates challenges in shredding and sorting the metal to achieve acceptable impurity levels for secondary manufacture. For this reason, scrap that can be segregated by its chemical composition retains higher value, because mixed streams require further refinement.

Through careful sourcing, inspection and processing, Sims Alumisource can provide a unique, furnace-ready, custom-shredded and blended aluminium scrap alternative, Alumishred™, for the aluminium industry. This allows Sims Metal to reduce risks for smelters, which encourages further use of recycled content; avoids resource use and emissions involved in intermediate processing; and commands a premium for the products our metal business creates.

Additionally, by leveraging our shredding, screening and briquetting equipment, Sims Alumisource can provide a wide range of blended aluminium products for artificial slag conditioners, deoxidation and desulphurization products that are designed to meet the unique requirements of customers in the steel industry.

All of these goals relate to our direct emissions (Scopes 1 and 2), and we distinguish between carbon-neutral (2030) and net-zero (2050) targets. We consider “net zero” (2050) to be the point at which emissions are reduced by at least 90 percent compared with the company’s baseline year with residual emissions offset. In the lead-up to 2030, we will implement our carbon action plan, as described in this document. This plan will include the transition to renewable electricity since electricity is responsible for 49 percent of emissions in our baseline year. Considering the number of mobile plant and road vehicles with an expected lifespan beyond 2030 and the challenge of adequate availability of low-emissions alternatives, eliminating emissions from fuel combustion (Scope 1 emissions) before 2030 is not possible. Remaining emissions will be balanced through the use of verified carbon offsets.

We believe that by pursuing carbon neutrality in the medium term, this appropriately aligns with our purpose and commitment to SDG 13: Climate Action. The governance, actions and risks are described later in this document.

In FY22, Sims Limited measured our value chain emissions (Scope 3 emissions) for the first time. We will take a considered approach to setting Scope 3 targets, and we will further define our action plan for Scope 3 emissions during FY23. Refer to pages 26-33 for a discussion on Scope 3 emissions and our immediate action plans.



BOARD ENGAGEMENT ON CLIMATE IN FY22

Climate change and the low-carbon transition are routinely on the Board's agenda, including strategy, risk management and progress against our targets. In FY22, the Board:

- Approved new 2025 targets for 100% renewable electricity and carbon neutrality for Sims Lifecycle Services and moved forward the group's carbon-neutral target to 2030 from 2042.
- Approved the revision of the Sims Energy and Climate Policy to include specific reference to the Paris Agreement goals.
- Reviewed Scope 3 baseline reporting.
- Engaged with investors in the approach to the publication of this report and non-binding advisory resolution on climate taking place at the 2022 Annual General Meeting (AGM).
- Endorsed this report and the approach to be taken on the resolution.

In addition, the Risk Committee approved the revision of Sim's Limited's Risk Appetite Statement, which highlights climate change as a force in the global landscape, and the People & Culture Committee approved new components related to climate-change targets in executive remuneration.

BOARD ACTIONS ON SUSTAINABILITY



Approved new 2025 targets and acceleration of group's carbon-neutral target



Engaged with investors on approach to Climate Report and non-binding advisory vote for FY22 AGM

The Board of Directors is responsible for ensuring there are adequate policies and strategies in place to understand and manage climate risk while also seizing the strategic opportunities presented by the transition to a low-carbon economy.

Climate change governance

Climate change is a material governance and strategic issue, and the Board of Directors is responsible for ensuring there are adequate policies and strategies in place to understand and manage climate risk while also seizing the strategic opportunities presented by the transition to a low-carbon economy.

The Safety, Health, Environment, Community and Sustainability (SHECS) Committee assists the Board in overseeing its climate-related performance and governance responsibilities. The Risk Committee reviews climate-related risk and is ultimately responsible for overseeing the embedding of climate risk into the Enterprise Risk Management (ERM) approach and setting the risk appetite for the company. The charters for these committees are available in the FY21 Corporate Governance Statement and Director's Report and at www.simsltd.com/governance. In practice, all members of the Board participate in each committee meeting, which supports holistic consideration of climate-related topics.

MANAGING RISK AND OPPORTUNITY

With support and input of the executive leadership team, our chief risk and compliance officer (CRCO) is responsible for providing and maintaining the ERM framework, in which climate change risk is considered. Reporting to the CEO and Board, the CRCO has accountability for oversight of climate targets and climate-related matters across the company, including monitoring performance across the business, maintaining the ERM system and performance disclosure.

Executives are ultimately the risk owners and are accountable for identifying, managing and monitoring climate-related risks and opportunities within the ERM framework and risk appetite. Key risks are reported to the Board's Risk Committee at least quarterly. The CEO, CRCO and the rest of the executive leadership team are accountable for the company's actions and commitments to embed climate change into our risk management and business strategy.

In relation to opportunities, our executive and management teams, under the leadership of the CEO, are responsible for delivering the strategic direction and goals approved by the Board. These include implementation of climate-related targets and policy positions, identification and management of risks and opportunities, and reporting on these topics to the Board directly and/or through the relevant Board committees.

INCENTIVE PLANS AND KPIS

The People & Culture Committee of the Board is responsible for determining and approving remuneration packages for the CEO and executive leadership team.

In FY22, the Committee strengthened the link between performance pay outcomes and achievement of our climate goals. In FY22, the long-term incentive (three years) was comprised of targets related to the growth of our circular businesses, as embedded within our sustainability strategy. From FY23 onward, a weighting of 10 percent of the long-term incentive is tied to the achievement of the company's 2025 goals to reduce absolute emissions by 23 percent from the FY20 baseline and to achieve 100 percent renewable electricity. This incentive will reward key management personnel for emissions reductions.

Targets to grow our circular businesses, which are embedded within our sustainability strategy, make up the remaining 90 percent of the long-term incentive. Details of these incentives are available beginning on page 55 of the FY22 Annual Report. These incentives together will support the company's ability to deliver shareholder value in the transition to a low-carbon economy.

EXTERNAL STAKEHOLDER ENGAGEMENT

Our climate change strategy is supported by active engagement with our stakeholders, including investors, customers, policymakers and our communities. We regularly review our plans in response to stakeholder input, changes to climate change policy and regulation, and the latest scientific knowledge on climate. In FY22, we conducted a refresh of our Environmental, Social and Governance (ESG) Material Topics analysis and identified that action on GHG emissions was a high-priority material issue.

The Board uses a range of formal and informal communication channels to understand the views of shareholders in relation to climate change. Increasingly, commentary related to climate change is part of all routine investor engagements, including results roadshows, the 2022 Investor Day and investor engagement meetings.

In FY22, the chair, CEO, CFO, senior management, and Sustainability and Investor Relations teams met with investors and analysts globally. Climate-related topics included our revised targets, ESG strategy and value chain emissions. Specific engagement was conducted in advance of preparing this report and the associated advisory resolution at the 2022 AGM.

PINKENBA ACQUISITION

In FY22, site closures and extended production outages were experienced due to flood conditions in Rocklea, Queensland. This was the second time a severe flood event had occurred in the last 10 years and the scenario analysis indicated the likelihood of future severe floods at that premises was high.

In FY22, Sims Limited acquired a strategic 140,000 square-meter parcel of land located at Pinkenba, Queensland. The site offers long-term potential to create a best-in-class and lowest-cost metals processing and resource renewal facility, producing high-quality ferrous and non-ferrous metals, with on-site waste treatment and hydrogen generation. In addition, the Pinkenba site has deep-water access, allowing loading on-site and enables us to significantly reduce emissions from freight transport between yard and port.

As part of the due diligence process, we assessed the medium-term and long-term climate risk, particularly risks due to flooding and sea-level rise, using different climate scenarios. We identified this site offered higher resilience under all scenarios.

The Pinkenba acquisition will assist us to execute our strategic growth priorities, deliver costs and emissions savings, and increase resilience to acute climate events.



**Strengthened link between
performance pay outcomes and
climate goals achievement in FY22**

Sims Limited frequently works with stakeholders and engages with government on the design of circular economy and waste management policy and regulations, which are increasingly aligned to climate-action objectives. We do this in line with our long-standing support of policy and regulation that is applied equally and consistently, to lift the market to the high standards to which we operate. We support the development of Paris Agreement-aligned regulation and in FY21, we signed the [open letter to President Biden](#), led by the We Mean Business Coalition, urging the Biden-Harris administration to set ambitious climate targets to cut GHG emissions in the United States by at least 50 percent below 2005 levels by 2030.

In 2022, for the first time we undertook a review of the climate policy positions of the industry associations of which we are a member. The review aimed to establish if there were any instances of material misalignment of their positions with Sims Limited's energy and climate policy. None were found. More details of this review are available on our website.



Opportunity and risk management

In informing our strategy, Sims Limited has identified climate-related risks and opportunities over the short (2030), medium (2050) and long term (2070). These occur in relation to both the physical risks of rising temperatures and the transition to a low-carbon economy.







Consistent with the TCFD recommendations, we have used scenarios to assist us with understanding these risks and opportunities. Scenarios describe a range of possibilities for the future, to provide a structured way of thinking through uncertainty and making strategic choices.

We have used both lower- and higher-emissions scenarios to understand the potential projected range of climate-related financial impacts. We used publicly available

information from the Representative Concentration Pathways (RCPs) adopted by the IPCC Fifth Assessment Report (IPCC AR5) and Network for Greening the Financial System (NGFS), to describe different possible futures and indicative economic and social impacts.

Physical risks can be acute (e.g., cyclones or floods) or chronic (e.g., sustained higher temperatures that may lead to sea-level rise). Transition risks and opportunities encompass the impacts of policy, regulatory and market changes required to transition to a low-carbon economy. In our TCFD analysis, conducted in 2021, we considered physical risks at our 22 largest sites and at 36 strategic destination ports worldwide.

CLIMATE RISK AND OPPORTUNITY SUMMARY

	Risk or opportunity assessed	Metrics considered	Time frame	Reference scenario
 Extreme heat	<p>Productivity (from workers and machinery) may decrease, resulting in a negative financial impact to Sims Limited.</p> <p>Water availability may be limited, causing impacts to dust suppression activities.</p>	<ul style="list-style-type: none"> Fraction of the year in locally defined hot days Days above 33°C/90°F Sites in water-stressed areas 	2030 2050 2070	RCP 4.5 RCP 8.5
 Extreme rain (flooding and cyclones)	Increased flooding risk may disrupt Sims Limited's value chain, impacting revenue.	<p>Wettest day rainfall</p> <ul style="list-style-type: none"> Cyclones/hurricanes Mean sea-level rise (2050 only) 1-in-100-year extreme sea-level rise (2050 only) 	2030 2050 2070	RCP 4.5 RCP 8.5
 Greater climate change regulation	Climate change may accelerate the rate and magnitude of change in environmental policy and regulations. This may change the costs of doing business for Sims Limited operations and key suppliers.	<ul style="list-style-type: none"> Carbon-pricing policies and regulations Cost of carbon Recycling policies and regulations 	2030 2050 2070	NGFS Scenarios: <ul style="list-style-type: none"> Orderly Disorderly Hothouse world
 Increased demand for recycled products	Action to limit climate change will likely accelerate the demand for recycled materials due to changing consumer and customer expectations as well as legislation. This would generate revenue for Sims Limited.	<p>Steel demand (MT*)</p> <ul style="list-style-type: none"> Availability of scrap steel (MT) Increase of available scrap steel (%) <p>* Million tonnes</p>	2030 2040 2050	NGFS Orderly
 Investment to decarbonise operations	Sims Limited will likely need to invest to achieve its 1.5°C commitments. We will need to monitor emerging technologies and solutions to make financially prudent investments. We will engage in the purchase of carbon offsets for residual emissions.	<ul style="list-style-type: none"> Energy generation Energy storage Modern transition fuels (e.g., biofuels) Carbon market development 	2030 2040 2050	NGFS Orderly
 Access to capital	Investors and financiers seek to lower the emissions impact of their portfolios in line with changing market preferences and/or regulation. The drive to a low-carbon economy leads to new finance models becoming available.	ESG disclosure performance	2030 2040	NGFS Orderly

In 2022, we extended our analysis of physical risk and created a new risk management dashboard that incorporates information about climate risk for all premises, using two different scenarios. The information comes from publicly available sources and considers factors such as water stress, sea-level rise and temperature rise. The dashboard can be overlaid with additional information about the site, such as demographic information or processed volume, to help provide a holistic risk picture. The dashboard to operational and strategic staff to inform decision-making will be rolled out during FY23.

Action to limit climate change will likely accelerate the demand for recycled materials due to changing consumer and customer expectations as well as legislation.

Results and impacts	Incorporation into strategy
<p>By 2050, all sites may experience an additional 5-40% hot days in a year.</p> <p>By 2050, 35 sites could be located in water-stressed areas, of which four sites are considered large water users (>10,000 m³ p.a.).</p>	<p>Sims Limited's Environment, Health and Safety (EHS) policy already covers heat stress.</p> <p>We are investing in water recycling solutions to reduce water consumption. We are also investing in advanced dust suppression technology that does not use water as an input.</p> <p>Scenario results are used to inform further resilience activities including investigating any technology, process changes or structural alterations that may reduce impacts from heat.</p>
<p>The considered climate metrics are all expected to increase. We have identified key locations that are more exposed than others. Storm surges and sea-level rise may cause significant regional damages.</p>	<p>We are already adapting to extreme weather events such as flooding in Queensland and hurricanes Sandy, Henri and Ida. Adaptation differs depending on the relative risk and treatment available.</p> <p>The results of our scenario are used to better inform future mitigation and adaptation plans for expected increased impacts. We are considering these impacts in due diligence processes.</p> <p>This extreme weather risk is not unique to Sims Limited and can in part be avoided through stakeholder collaboration and collective action to accelerate decarbonisation.</p>
<p>We may see the highest increase in costs if we do not take any climate action (disorderly scenario). This is because governments are assumed to introduce immediate but divergent climate-related policies.</p>	<p>Sims Limited already keeps abreast of changing regulation and legislation relevant to our business. This allows us to monitor and prepare for future changes.</p> <p>In FY22, we announced an increase in the ambition of our climate-action targets and have taken action to decarbonise our operations, independent of a regulatory requirement.</p> <p>We have adopted a shadow carbon price internally to model the potential impacts of carbon pricing on our operations and strategy.</p>
<p>Recycled steel and scrap supplies are expected to continue increasing. Sims Metal's processing demand under these scenarios is projected to double by 2050.</p>	<p>Achievement of global climate targets necessitates the transition to a more resource-efficient and circular economy, which is already core to our strategy and corporate purpose.</p> <p>We continued to advance our strategy in FY22 with the acquisition of Recyclers Australia and Atlantic Recycling Group, which together will deliver 200,000t of additional ferrous and non-ferrous product.</p> <p>See the Metrics and Targets section of this report for more on our performance against our strategic goals to accelerate the circular economy to achieve our purpose.</p>
<p>For Sims Limited to transition in line with a 1.5°C-aligned scenario ("Net Zero by 2050"), we will need to invest in projects that reduce fossil fuel use and increase the percentage of renewable energy used. This is consistent with our committed targets and strategy.</p>	<p>Sims Limited has committed to becoming net zero by 2050 with staged goals at 2025 and 2030. Our Scope 1 and 2 targets are consistent with the SBTi methodology.</p> <p>We have defined our key pathways to decarbonisation as per pages 18-25 in this document.</p> <p>We use an internal shadow price on carbon to model potential impact of decarbonisation investment and costs of potential carbon offsetting.</p>
<p>Our low-carbon revenue model and disclosure of ESG performance is attractive to ESG-focused investors and lenders.</p>	<p>Sims Limited has invested in focused ESG data and reporting resources to improve transparency, and this enables us to demonstrate our ESG credentials.</p> <p>Transparency on our performance positions us to be able to take advantage of emerging sustainability finance instruments such as green bonds or sustainability-linked loans, if required in the future.</p>

DELIVERING ON OUR AMBITIONS

Managing our operational footprint

Reducing our operational emissions is a key strategic driver for Sims Limited. We disclosed Scope 1 and 2 emissions totals based on an operational control boundary. Emissions associated with joint ventures where we do not have operational control are presented in the Scope 3 boundary, according to our equity interest. In FY22, we have presented a market-based emissions calculation.

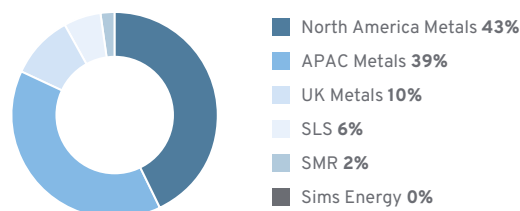
As shown to the right, the main sources of our operational emissions in FY22 were electricity (41 percent) and diesel (53 percent). Other sources of operational emissions included natural gas and cutting gas (such as oxygen torches). The core metal business generates the bulk of the group footprint.

In FY22, our footprint decreased by 21 percent,¹⁰ largely due to executing new electricity supply agreements in line with our commitment to use renewable electricity. This added Claremont, New Jersey (our largest electricity consumer); Kwinana, West Australia; 10 sites in New Zealand; and five SLS Circular Centres across Europe and Asia to those sites using 100 percent renewable electricity.

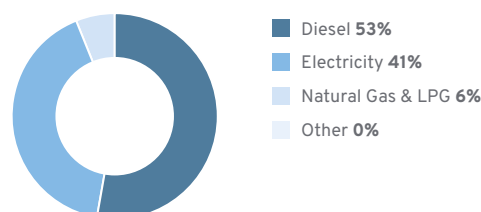
PATHWAY TO NET-ZERO OPERATIONS

Our priority is to invest in reducing our operational emissions, with carbon offsets used for those emissions we cannot eliminate or reduce before 2030. During FY22, we have put new governance in place to help prioritise and assess initiatives, including implementing a shadow carbon price.

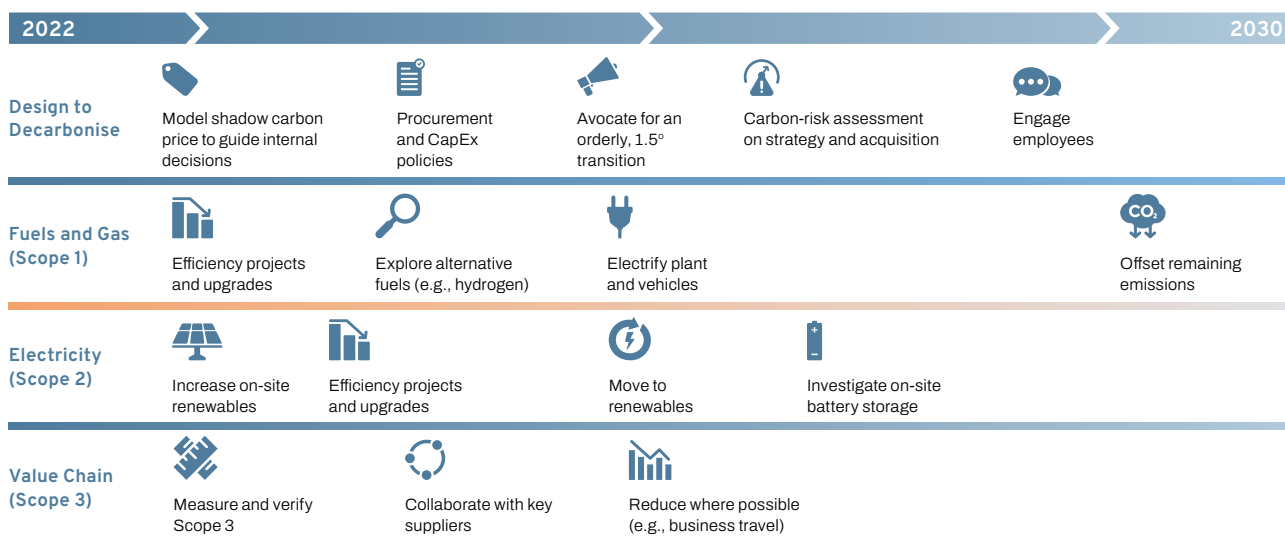
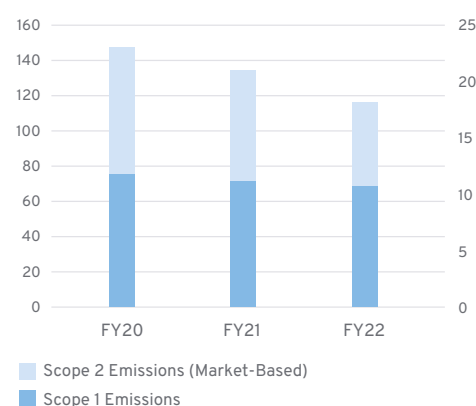
CO₂e CONTRIBUTION (MARKET-BASED)



FY22 EMISSIONS SOURCE



TOTAL EMISSIONS





Main sources of our operational emissions in FY22 were

41%

electricity and

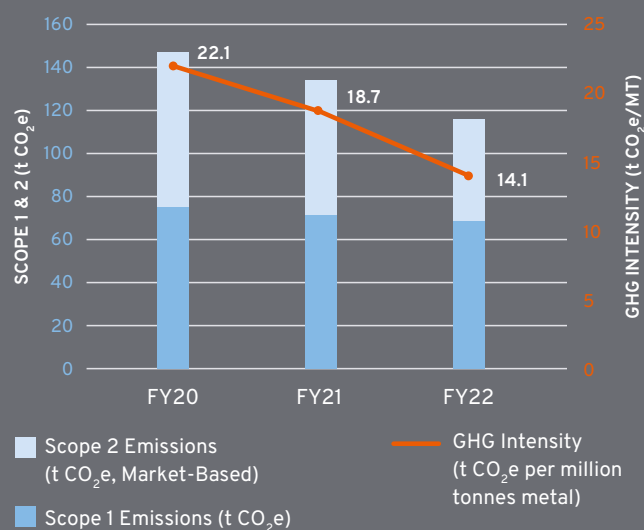
53%

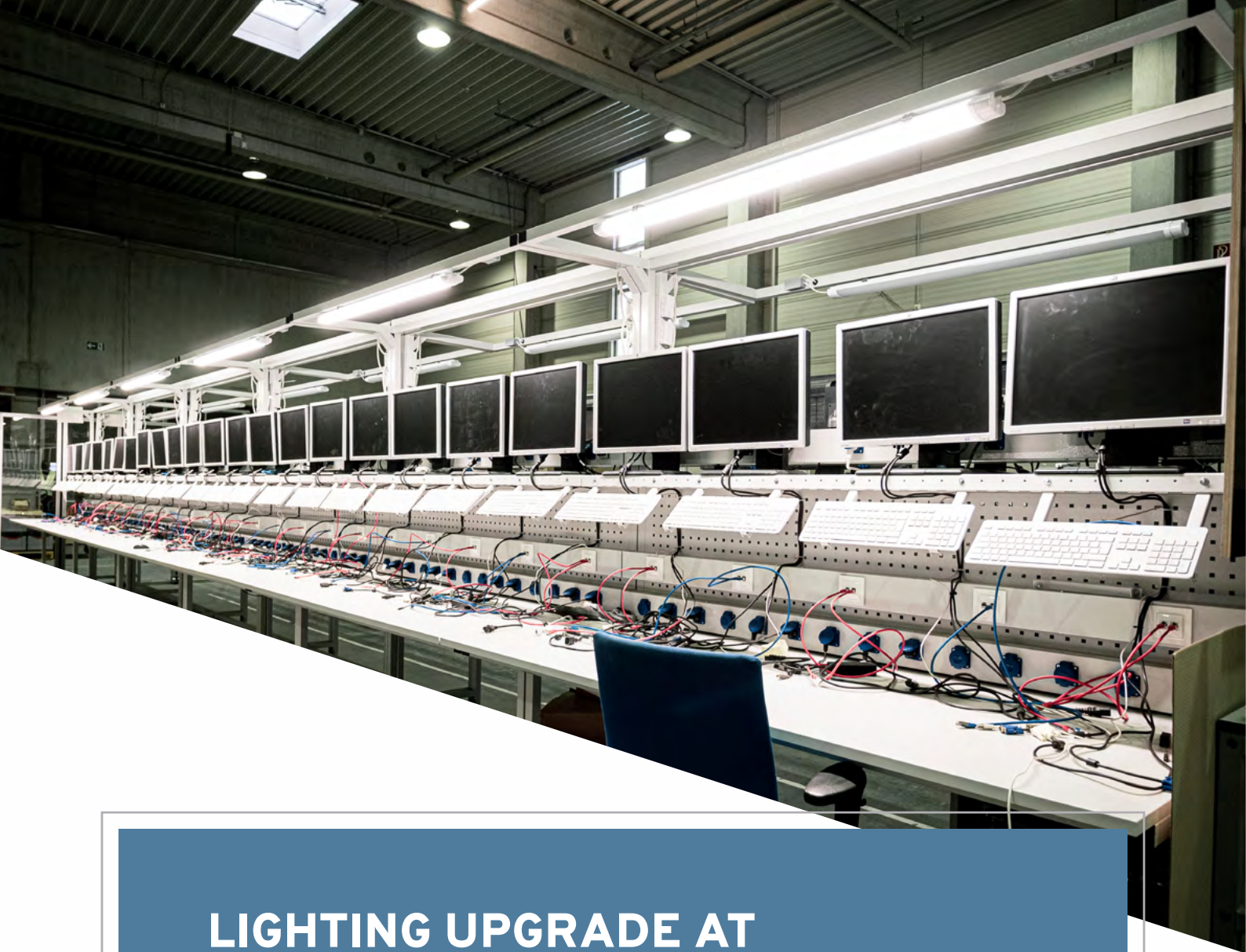
diesel

GHG INTENSITY

GHGs can also be expressed relative to another unit, such as revenue or tonnes of production, which is called an intensity metric. This is useful for understanding the relative intensity of GHG emissions compared to our business activity.

We have presented this as tonne CO₂e per million tonnes of proprietary metal volume. As brokered volume is not processed by us, it does not have a large impact on our Scope 1 and 2 performance. Emissions relevant to brokered volume (e.g., transport, customer processing, etc.) are included in the Scope 3 boundary.





LIGHTING UPGRADE AT GUSTAVSBURG

In order to achieve Sims Lifecycle Services' aggressive 2025 carbon-neutrality target, we are re-examining every aspect of what we do and how we do it. Our Circular Centre in Gustavsburg, Germany, is strategically located near Frankfurt's data centre hub, so we minimise the distances and emissions associated with moving decommissioned material for processing. Once equipment is on site, we want to ensure it is processed as efficiently as possible, and have taken major steps toward lowering the carbon footprint of the Gustavsburg Circular Centre.

In FY22, all lighting – exterior, interior warehouse, office and task – was transitioned to energy-efficient LED lighting. Overall, nearly 400 fixtures covering 4,800 square meters (over 51,000 square feet) were replaced. This should bring a 50 percent reduction in annual electricity use from lighting, compared to 2020.

The new lighting also contributes to positive safety outcomes. LED lights require less maintenance than traditional lighting, meaning employees spend less time working at heights. Additionally, overall visibility is improved because of the quality of the lighting and its adjusted placement across the facility.

As of 1 January 2022, Gustavsburg is also using 100 percent renewable energy. Our consumption is matched with Guarantee of Origin certified electricity from European hydroelectricity.

Decarbonising our electricity supply

Sims Limited plans to deliver our short-term target by initially focusing on decarbonising our electricity supply. In line with our commitment to use 100 percent renewable electricity by 2025, we will support renewable generation in our contract procurement of electricity and match our consumption with energy attribute certificates (EACs). We will also consider installation of renewable energy generation and storage at our sites. These are low-risk options that can be achieved with modest investment in mature, commercially available technologies. In line with our Energy & Climate Policy, we will advance energy efficiency and conservation methods throughout the portfolio. These projects will reduce energy demand and costs, as well as emissions.

Planned electrification of the diesel fleet will increase electricity

consumption at our yards, so moving to renewable electricity early is of strategic importance to recognise the maximum emissions reductions and support capacity and demand management at sites.

FY22 PROGRESS

In FY22, electricity contributed 41 percent (market-based calculation), down from 49 percent in the baseline year, as a result of new contracts initiated. In FY22, we executed new renewable electricity agreements for high-consumption Sims Metal sites at Jersey City; Kwinana, Western Australia; and for all Sims Metal sites in New Zealand. New agreements were also executed for SLS sites at Gustavsburg, Germany; Eindhoven, the Netherlands; Bydgoszcz, Poland; Auckland, New Zealand; and both sites in India. These agreements

were executed at different points in the reporting year, so further emissions reductions will be observed in the FY23 reporting period. All of our sites in the UK, Ireland (SLS), and an additional five sites in the United States used renewable electricity for the whole reporting period.

Sims Limited is also progressing deployment of on-premise renewable electricity. While on-premise installations will, in general, cover only a small amount of consumption, these installations offer value for money, can reduce daytime demand peaks (and associated charges), and reduce Scope 2 and Scope 3 emissions (as they relate to upstream electricity transmission loss). In FY22, we identified several opportunities that will be progressed in FY23.



Moved to

100%

renewable electricity at
6 SLS sites in FY22



Executed new renewable
electricity agreements at

17 SITES

globally in FY22

Reducing diesel use

Combustion of diesel contributed 53 percent of operational emissions in FY22. Most of the consumption was from diesel used in mobile plant equipment in our metal yards. Diesel may be displaced by alternative fuels such as biodiesel or hydrogen, but we consider that electrifying assets has the strongest potential in the near term.

Transitioning from a diesel to an electrified fleet has significant value for the company. In addition to emission reductions, lower operating and fuel costs can be achieved. It also reduces potential exposure of employees in our yards to diesel particulate emissions.

Where electric-asset options are readily available and are commercially comparable to diesel assets (considering whole-of-life operational costs), they are being adopted, and electric assets are being deployed throughout the company. However, for other asset classes in our Sims

Metal business such as our road fleet, low-emissions options may not yet meet our operational or commercial requirements. In the short term, we are also experiencing delays in the availability of new vehicles and machines due to ongoing supply chain disruptions. We will adopt a phased approach to replacing these assets, considering the planned end of life for owned assets, as well as identifying where procedures can be redesigned to support electrification.

During FY22, in line with our global procurement strategy, we've increased our engagement with original equipment manufacturers (OEMs) and non-operated joint ventures to identify, trial and cost effectively procure low-emissions options.

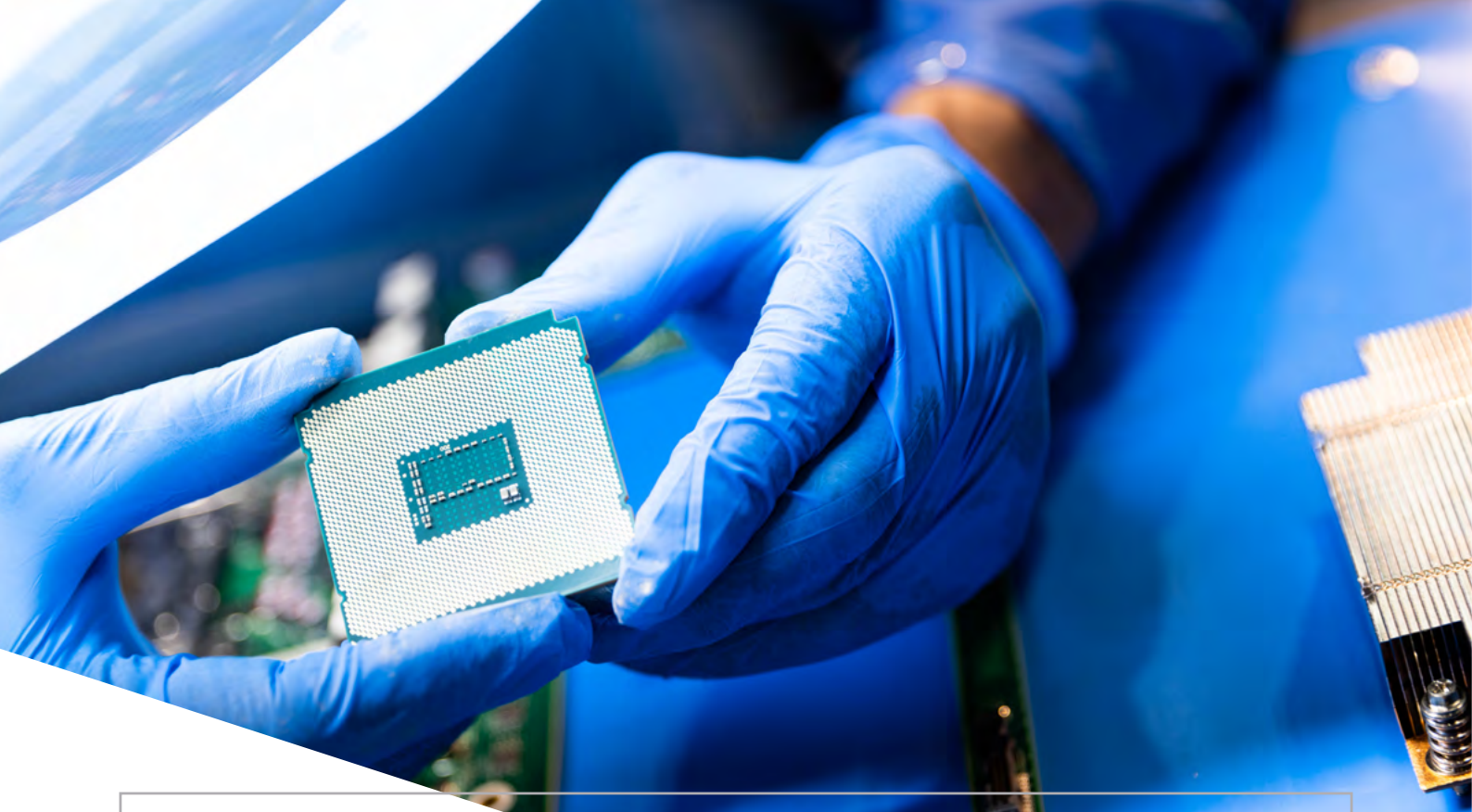




ELECTRIFYING ASSETS AT SIMS LIMITED

In FY22, we continued with our electrification efforts. Sims Metal highlights included upgrading and replacing two of our diesel-operated shears in Gillman and Kwinana, Australia, with electric ones, which together will reduce diesel consumption by more than 45,000 litres annually. We commissioned a Sennebogen 840E electric crane, used to feed our shear in Richmond, Calif. This replacement, combined with other mobile plant upgrades at the site, will reduce diesel consumption by over 150,000 litres annually.

**An electric yard
goat performs
container-loading
operations, avoiding
the consumption of
over 7,500 litres of
diesel each year.**



SIMS LIFECYCLE SERVICES

In FY22, Sims Limited committed to accelerate obtaining climate neutrality for our Sims Lifecycle Services (SLS) business globally. SLS plays a critical role in helping businesses and data centres manage the profound shift in how and where technology is managed. As a worldwide leader in IT asset and cloud infrastructure reuse, redeployment and recycling, SLS customers include innovative technology and data centre businesses, which are defining the decarbonisation agenda in their sector. By achieving carbon neutrality as early as 2025, SLS will further help its customers reduce emissions impacts across their own value chains.

The largest source of emissions in the SLS business (64 percent) is natural gas, primarily from the precious metals assay facility at Franklin Park, Ill. Our assay lab processes samples from customers' materials to determine precious metal percentage. The process currently uses natural gas to achieve the high temperatures required to melt samples. While we will pursue efficiency and low-emissions alternatives, it is likely that, in the short term, these emissions will be balanced with verified carbon offsets to meet the 2025 carbon-neutral target.

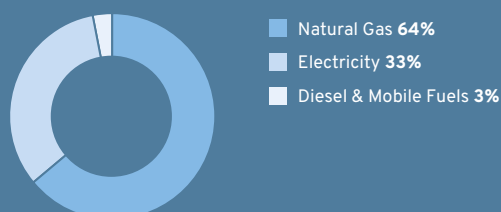
Electricity is the next largest source (33 percent), and is the largest source of emissions for circular centres (excluding Franklin Park). Remaining emissions (4 percent) come from vehicle fuel for light-duty vehicles and the mobile plant. The SLS business uses third-party haulers for most logistics movements, which are accounted for in the Scope 3 boundary.

SLS emissions reductions priorities are aligned with Sims Limited and include:

- Switching to 100 percent renewable electricity contracts at premises where we directly contract for electricity. Where we do not, we use our influence to encourage landlords to provide renewable electricity or cover usage with EACs.
- Examining efficiency and fuel substitution options in the assay process at Franklin Park.
- Pursuing energy-efficiency and conservation programs across the portfolio.
- Pursuing electric and low-emissions options in the SLS light-duty vehicle fleet.
- Setting desired environmental criteria for new premises as we expand our global operations.

During FY22, we progressed this strategy and moved SLS sites in New Zealand, Europe and India to 100 percent renewable electricity. Additionally, at our German site, all lighting at the facility was upgraded to LED, including exterior, interior and task lighting. Refer to [page 20](#) for more information on the lighting upgrades.

SLS EMISSIONS SOURCES FY22 RESTATED



Technology to advance decarbonisation

Sims Limited will seek to investigate and trial new technologies where appropriate, including using other fuels such as biodiesel and hydrogen. In FY22, we conducted a small-scale trial of hydrogen injectors retrofitted to diesel engines that have helped to reduce fuel consumption by up to 10 percent. This pilot is continuing across different asset types to better understand its potential with the company.

Initially, we will produce hydrogen, which is a clean fuel that, when consumed in a fuel cell, produces only water, electricity and heat. Hydrogen can play an important role in the transition to a low-carbon economy and could potentially be used as an alternative to fossil fuels in passenger and road freight vehicles. This also may have a potential application in our own transport fleet.



In FY22, we conducted a small-scale trial of hydrogen injectors retrofitted to diesel engines that have helped reduce fuel consumption by up to 10 percent.



Emissions in our value chain

At Sims Limited, we recognise that climate change is a shared global challenge and that our actions are not complete without engaging the value chain. For this reason, in FY22 we completed measurement of our value chain emissions (Scope 3 emissions) for the first time. Sims Limited accounts for the Scope 1 and 2 emissions of our non-operated joint ventures according to the equity share approach.

Like many companies, the emissions in our value chain are significantly higher than the emissions from our direct operations. Because they are outside of our own operations, we do not have operational control of these emissions and must collaborate and use our influence to drive reductions, as well as to obtain accurate and complete data.

The best way for Sims Limited to contribute to the net-zero transition is to work in partnerships to help shape demand for circular, low-carbon metals and electronics. Our approach to addressing Scope 3 emissions is to engage with our customers on climate change and work with them to develop and scale up the technologies to decarbonise secondary metal production. We will consider how to best engage our value chain and appropriate targets for Scope 3 emissions reduction over the next 12 months. We will also continue to refine our procedures to collect complete and detailed data for sources of Scope 3 emissions.

More than 90 percent of Scope 3 emissions are from the steel and maritime sectors, relating to the processing and freight of Sims Metal's sold product. Our ability to make significant reductions to Scope 3 emissions will depend on the decarbonisation of these sectors in line with the Paris Agreement goals. More details on the trajectory of these sectors are discussed below.

As emissions from the marine freight and secondary processing of the sold-metals product dominate the Scope 3 inventory, more than 95 percent of the Scope 3 inventory is associated with the Sims Metal business.

SLS downstream and upstream emissions make up less than 3 percent of our Scope 3 emissions. However, we have opted to present it for the purpose of presenting a complete understanding of this division. Emissions from the use of refurbished products (e.g., the electricity they consume in their second lifecycle) represent the largest source of emissions in the value chain, along with third-party transport. SLS participates in the U.S. EPA SmartWay program to assist in improving freight efficiency and environmental performance across logistics activities.

MATERIAL SCOPE 3 CATEGORIES

Scope 3 Category		(t CO ₂ e)	% of Scope 3
Category 1	Purchased goods & services	93,039	2%
Category 2	Capital goods	94,776	2%
Category 3	Fuel- & energy-related activities	32,286	1%
Category 4	Upstream transportation & distribution	38,648	1%
Category 9	Downstream transportation & distribution	571,306	14%
Category 10	Processing of sold products	3,024,248	76%
Category 11	Use of sold products	47,304	1%
Category 15	Joint ventures (equity share)	52,828	1%
Total*		3,954,435	

* Due to rounding, may not equal 100%

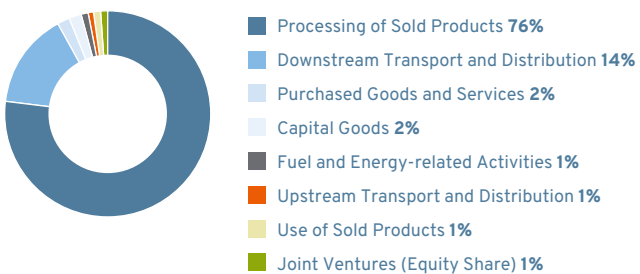


Launched the

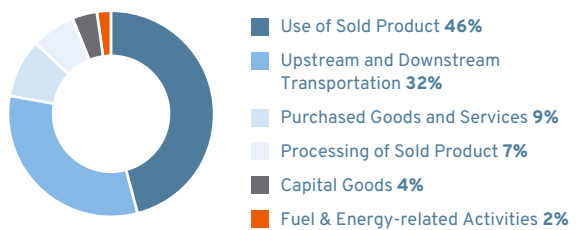
SLS SUSTAINABILITY CALCULATOR

providing industry-leading environmental impact reporting to our clients

% CONTRIBUTION (MAJOR CATEGORIES)*



SLS SCOPE 3 EMISSIONS



* Due to rounding, may not equal 100%

Sims works in partnership to shape demand for circular, low-carbon metals and electronics.



Committed to spending

~\$20-25M

in environmental CapEx in FY23 to reduce our environmental impact and make us more competitive

Processing of sold products

The largest single source of Scope 3 emissions is from the remelting of our processed metal products into new metals, particularly ferrous metal, which represents most of the metal we trade (by volume).

The future trajectory of this category relies on our customers' decarbonisation roadmaps, which in turn will be guided by the development of renewable energy, technology solutions within the sector and government policies that enable this transition. Through engagement, we know that some of our customers, particularly customers in domestic markets, have set Scope 1 and Scope 2 emissions reduction targets for their businesses. These commitments take varying forms: Some are expressed in reduction in emissions intensity (e.g., CO₂e per tonne of product); some as absolute emissions reductions within this

decade; and some include net zero by 2050 goals. These commitments are underpinned by national net-zero commitments in our core domestic and export markets including Australia (2050), United States (2050) and Turkey (2053). In FY22, 93 percent of our emissions in this category were generated in countries that have net-zero pledges by 2055, rising to 98 percent by 2070.

DECARBONISATION OF STEEL PRODUCTION

However, the decarbonisation of the steel sector is a significant challenge, as outlined in a recent report by The Institutional Investors Group on Climate Change (IIGCC), in partnership with Climate Action 100+ (CA100+). In their modelling of even the most ambitious trajectory for innovation, investment and adoption of decarbonisation measures, the

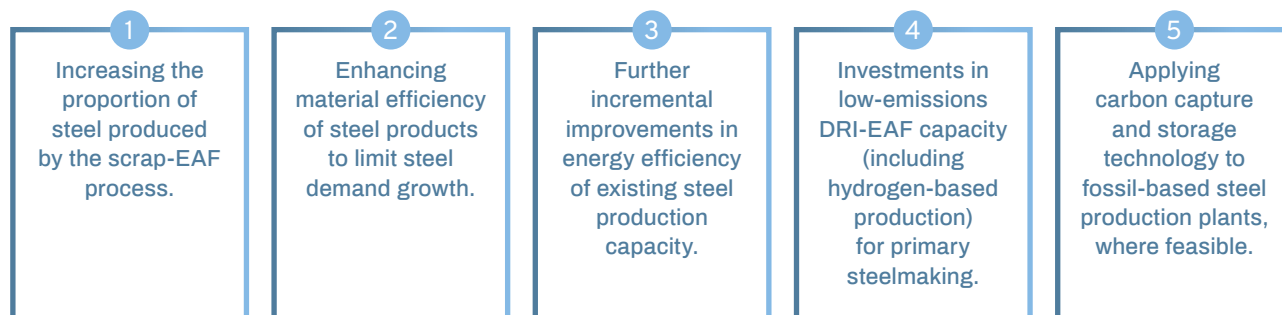
steel industry is considered unlikely to reach net zero by 2050.¹¹ The uncertainties related to technological innovation, government policies, the supply and trade of steel and steel products (including scrap), the age of existing global steelmaking facilities, and the projected future growth in demand all make the trajectory of this source of Scope 3 emissions difficult to predict.

At the time of writing, the SBTi and the steel sector were working to develop science-based, target-setting methodologies, tools and guidance for steel companies and stakeholders. The first public consultation is expected in late 2022 and final publication in the first half of 2023.¹² Our Scope 3 emissions reduction pathway will be heavily influenced by the relative trajectory outlined in this guidance.

11 Institutional Investors Group on Climate Action (IIGCC), "Global Sector Strategies: Investor Interventions to Accelerate Net Zero Steel" (4 August 2021)

12 Science Based Targets, Sector Guidance, Steel

The IIGCC/CA100+ report highlights five key measures to decarbonise the steel sector:



These measures represent direct opportunities for Sims Limited's growth, due to an increase of supply of scrap, particularly high-quality products, that are more efficient to process. Supply of hydrogen from the SRR process could also represent an opportunity.

WHAT WE WILL DO NEXT

In our approach to collaborate for reduction of emissions from the processing of our sold products, Sims Limited will:

- Continue to engage with customers to understand and support their Scope 1 and 2 emissions targets.
- Continue to improve our processes to deliver high-quality inputs that can be efficiently processed by customers.
- Engage with and monitor research from organisations such as SBTi, Responsible Steel and the Transition Pathways Initiative to understand the industry trajectory and pathways.
- Improve our understanding of how our current and future products can support innovative low-carbon approaches to steelmaking.



Upstream transport and distribution

Transport of sold product is the second largest source of emissions in the Scope 3 boundary, of which the largest contributor (85 percent) is marine freight of processed metal. Third-party heavy road, rail and barge freight (either to a domestic destination or to a seaport) makes up the remainder of this category.

Sims Limited freights globally using chartered vessels for bulk shipment and containers for smaller quantities. We perform modern slavery due diligence for chartered vessels.

DECARBONISATION OF MARINE FREIGHT

The International Maritime Organization (IMO) has estimated that international shipping accounts for about 2.2 percent of global emissions and that sector emissions could grow between 50 percent and 250 percent by 2050, mainly due to the growth in world trade. The IMO has set goals to reduce average GHG emissions intensity across international shipping by at least 40 percent by 2030 and 70 percent by 2050.¹³ The SBTi and World Wildlife Fund are collaborating on a pathway for the transport sector,¹⁴ of which phase two will produce science-based target-setting methods, tools and guidance for shipping companies

and stakeholders. However, as we freight globally, it is reasonable to anticipate that low- or zero-emissions shipping infrastructure may not be uniformly available across all marine routes, and that global progress will be uneven.

DECARBONISATION OF ROAD FREIGHT

Sims Limited's product is freighted on road by our own heavy goods vehicles (HGVs), where emissions will be captured in our Scope 1 boundary, and by third-party hauliers, typically owner-drivers, from which emissions are reported in the Scope 3 boundary. Current availability of zero-emissions heavy



freight is challenging. In 2021, less than 0.3 percent of the total number of medium- and heavy-duty vehicles registrations worldwide were electric vehicles.¹⁵ To achieve the Paris Agreement goals, the share of zero-emissions HGVs needs to rise to 45 percent by 2030 and to nearly 100 percent no later than 2040, if the transportation sector is to fulfil its emission reduction responsibilities.¹⁶

There is some reason for optimism regarding the increased presence of zero-emission vehicles in the Sims Limited value chain. In 2021, the United Kingdom became the first country in the world to commit to phasing out new, non-zero-emission HGVs weighing 26 tonnes and under by 2035, with all new HGVs sold in the United Kingdom to be zero-emission by 2040.¹⁷ Research

from the U.S. Department of Energy indicated that low-emissions heavy trucks are expected to become cost-competitive with diesel equivalents by 2035.¹⁸

WHAT WE WILL DO NEXT

We will take a collaborative approach with our value chain in seeking to decarbonise third-party road freight. This may involve investigating how we can support charging infrastructure or vehicle availability for owner-drivers, leveraging our own efforts to decarbonise our vehicle fleet. In general, we seek to minimise road travel distances through strategic location of our metal processing sites near deep-water ports, which minimises freight costs, as well as emissions.

Sims Limited will:

- Continue to identify options for low-emissions mode substitution (e.g., more volume transported via rail).
- Evaluate how GHG intensity could be incorporated as a criterion in chartering.
- Conduct further research to understand how we can effectively advocate for lower-emissions shipping.
- Seek to obtain quality emissions data from shipping companies, where available.
- Investigate ways we could support third-party hauler electrification (e.g., provision of charge points).

13 International Maritime Organization (IMO), "Our Work: Greenhouse Gas Emissions"

14 Science Based Targets, Sector Guidance: Transport

15 IEA, "Global EV Outlook 2022: Trends in Electric Heavy-Duty Vehicles"

16 The International Council on Clean Transportation (ICCT), "ZETVC Publication – Heavy-Duty Zero-Emission Vehicles: Pace and Opportunities for a Rapid Global Transition" (18 May 2022)

17 U.K. Government Department of Transport, "UK Confirms Pledge for Zero-Emission HGVs by 2040 and Unveils New Chargepoint Design" (10 November 2021)

18 U.S. Department of Energy, "DOE Projects Zero Emissions Medium- and Heavy-Duty Electric Trucks Will Be Cheaper than Diesel-Powered Trucks by 2035" (7 March 2022)



Procurement-related categories

Sims Limited's reported Scope 3 emissions inventory for procurement-related categories (e.g., purchased goods and services, capital goods, upstream fuel- and energy-related activities, and business travel) represent, as an aggregate, the third largest contributor to our FY22 Scope 3 emissions. These are also categories that may be exposed to carbon pricing and therefore help to identify climate risks and opportunities in our value chain.

Reported emissions in these categories include emissions from production of equipment used in our operations, construction materials used in our capital projects, professional services, business travel, and the upstream emissions related to the production of fuels used in our operations.

Aligned with the GHG Protocol reporting standards, our emissions estimations for procurement categories are generally based on the spend-based method, which covers cradle-to-gate emissions and applies an industry emissions factor to the value or number of units

purchased. We note that business travel in FY21 and FY22 has been impacted by COVID-related lockdowns and travel restrictions, and that emissions from this category may rise as travel fully resumes.

The [Sims Supplier Code of Conduct](#) sets out our expectation that suppliers have an emissions reduction program in place. We have provided the Code of Conduct to new and existing vendors. In FY22, we commenced collecting responses from UK Tier 1 non-trade suppliers, asking them to provide details of their Scope 1 and 2 emissions and to supply any plans for emissions reduction. This will provide a reference point to test future Scope 3 calculations and assumptions against.

We will conduct this exercise again in FY23 to formulate an understanding of how these suppliers are making progress against decarbonisation. Sims Limited will also seek to include climate and environmental performance criteria in supplier onboarding initiatives to be deployed in future years.

Avoided emissions in the value chain

Avoided emissions are emissions saved outside of a product's lifecycle or value chain, due to the use of that product. As the emissions are saved outside the value chain of a company's activity, they are not captured under conventional Scope 1, 2 and 3 frameworks.

Sims Limited is part of a value chain that diverts materials from landfill. These diverted materials are sorted and then refurbished, and parts are harvested or recycled to make new products. This avoids the GHG impacts associated

with the extraction, refining and transport of raw materials. In the metals value chain, secondary metals also require less energy to be made into new products than raw materials do. The additional lens from avoided emissions analysis, complementing conventional carbon metrics, is therefore useful to our stakeholders in examining the opportunities and risks for us in the climate transition.

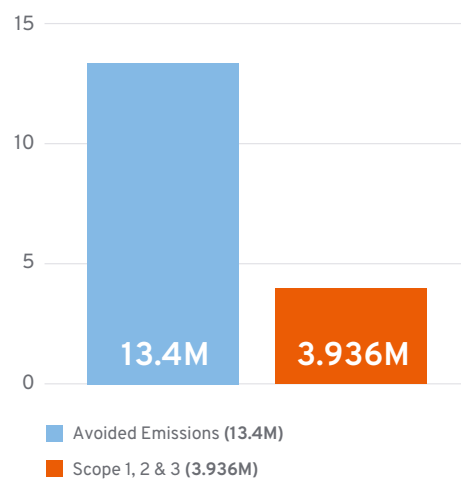


In FY21, the 8.3M tonnes of ferrous metal recycled with Sims Metal globally had the potential to avoid 13.4M tonnes of CO₂e emissions, compared to producing the same amount of steel from raw materials.



The analysis below, which was prepared with FY21 data, shows that the 8.3 million tonnes of ferrous metal recycled with Sims Metal globally had the potential to avoid 13.4 million tonnes of CO₂e emissions, compared to producing the same amount of steel from raw materials. For scale, 13.4 million tonnes of CO₂e is comparable to the annual emissions of some of Australia's largest coal-fired power plants.¹⁹

DIRECT, VALUE CHAIN AND AVOIDED EMISSIONS FY21



Unlike the GHG Protocol's accounting standards for Scopes 1-3, there is not an accepted methodology for avoided emissions, which are sometimes referred to as "Scope 4."

This analysis was prepared by a consulting firm using the same data reference points and assumptions that informed the Scope 3 calculation for the processing of sold product category. The recycling impact credit has been based on the publicly available 7th global World Steel Association lifecycle inventory study (2021), GaBi lifecycle analysis datasets, customised with data from the Sims Limited GHG inventory.

19 Clean Energy Regulator, Electricity sector emissions and generation data 2020-21



SIMS LIMITED AND CARBON OFFSETS

It's a common question: How come Sims Limited's recycling and repurposing activities don't generate carbon offsets? Carbon offsets must be considered additional; that is, the emissions reduction would not have occurred in the absence of a market for carbon offsets (beyond business-as-usual activities). Generally, our businesses are profitable without carbon offsets, so would not be considered additional. Carbon market schemes vary by region, and new methodologies are introduced from time to time. We monitor these developments as a part of the company's climate risk and opportunity management approach.

Carbon offset strategy

Although Sims Limited prioritises emissions reductions projects, there will be a requirement for offsets to deliver the company's carbon-neutral goals (2025 for SLS and 2030 for the rest of the portfolio businesses), particularly for Scope 1 emissions where solutions may be limited. We have not retired any voluntary offsets to date as we prioritise direct reductions of our operational emissions.

Where Sims Limited procures carbon offsets, we have set out the following core principles to guide our approach:

- Source offsets that deliver robust co-benefits for the environment and communities, preferably aligned with the SDGs and our sustainability strategy (Decent Work & Economic Growth, Climate Action and Responsible Consumption & Production).
- Apply robust standards for the quality of offsets, such as Verified Carbon Standard or Gold Standard offsets, to ensure they deliver additional benefits and permanence.

- Source a mixture of offsets generated in the countries where we operate and other countries to help manage the costs of offsets and maximise flexibility in procurement.
- Disclose the amount of offsets we retire.

We anticipate our volume of offsets during fiscal years 2025 through 2029 to be relatively small, so our strategy will be to purchase offsets through a partnership arrangement rather than direct investments in projects. Sims Limited will also evaluate options for generating offsets within our own value chain (sometimes known as "insetting").

At the time of writing, Sims Limited's business divisions were not required by regulation to participate in a carbon market in any geography.

Delivering a just transition

The Paris Agreement recognises the need to reduce emissions in a way that takes “into account the imperatives of a just transition of the workforce and the creation of decent work and quality jobs in accordance with nationally defined development priorities.”²⁰ Our sustainability pillars operate responsibly and close the loop are aligned with SDG 8: Decent Work & Economic Growth and SDG 13: Climate Action, respectively, and they are the two key elements of a just transition.

The transition to a low-carbon, circular economy benefits communities and environments. Our integral role in this shift means we occupy a unique position to also deliver long-term value for our employees and investors.

Our scenario analysis showed that our business growth will be resilient in different carbon scenarios, so we anticipate continued growth in our operations. While we regard this as a positive contribution to communities by delivering local employment, supply chain opportunities, waste reduction and community engagement, we also acknowledge that other impacts, such as dust, noise and traffic, are not as desirable. We strive to ensure that we are good neighbours, we implement controls for these impacts and we measure their effectiveness. We play an active role in our communities by supporting community organisations, schools and the local environment through investing our resources, time and expertise.

As part of our business operations, we may close or relocate certain sites, which would affect our employees and communities. Our sites vary in size from small feeder yards that employ a handful of people to our largest site in New Jersey in the United States, which employs just under 350 people. In general, the closure of a single site would not affect the economic viability of a community, but when and where site closures do occur, we assist employees with employment services and other support.

As we execute our business strategy to thrive in a low-carbon and circular economy, we will continue to strive to understand and address the potential positive and negative impacts on human rights. This is consistent with our commitments to human rights, including the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and our existing due diligence processes in this area.

Our third sustainability pillar is partner for change. We can support progress toward a just transition by collaborating with governments, supply chain partners, customers and our communities to identify opportunities that contribute to this shift. In Australia, we have committed to creating sustainable opportunities for Aboriginal and Torres Strait Islander people in our business and value chain as part of our Reconciliation Action Plan. We are collaborating with like-minded businesses through our membership in organisations such as the World Business Council.



20 “Paris Agreement” (United Nations, 2015)

Capital investment and green revenue in a 1.5°C world

Sims Limited is a green revenue business and our capital investment advances our growth strategy, which is focused on delivering revenue growth in core and new business models.

GREEN REVENUE

In FY22, the FTSE 100 Index Russell's Green Revenues Classification System (GRCS) assessed Sims as having 98.16 to 100 percent green revenue. The GRCS incorporates evolving global standards and best practices to research and analyse companies based on their impact on climate change mitigation and adaptation, water, resource use, pollution and agricultural efficiency. The FTSE Russell evaluates each business activity in the GRCS through the lens of seven environmental themes, which include all six European Union Taxonomy objectives.²¹ Our business activities fall into the Tier 1 category for businesses that deliver clear and significant environmental benefits. Sims Limited was also assessed as a 100 percent green revenue business by Corporate Knights in its 2021 analysis.

ENVIRONMENTAL CAPITAL INVESTMENT

In FY23, we will spend between \$20-25 million in environmental CapEx, which will not only reduce the environmental impact of our operations but also will make us more competitive. As regulations relating to environmental impacts of metal recycling become stricter, participants with poor environmental practices will not be able to remain in the market. By investing now, we believe that we will realise benefits over the medium and long term.

This CapEx is in addition to what we have already announced for growing and sustaining our low-carbon businesses. As always, investment decisions are subject to our rigorous commercial criteria to ensure that our capital allocation can enable us to safely manage our operations and provide a return on investment that is in line with our strategy and broader prudent obligations. As part of this obligation, we have adopted an internal (shadow) price on carbon to help ensure that our decisions reflect all costs, including environmental costs.

PRICING CARBON

A shadow pricing carbon is an internal decision-making aid that applies a theoretical surcharge per tonne of carbon emissions (CO₂e). The shadow carbon price is used to help us better understand the potential impact of external carbon pricing on our capital expenditure, investments and strategic decisions. Sims Limited conducts carbon-sensitivity analysis for decision-making with pricing modelled at a range of price points up to AU\$100/t CO₂e by 2030. The carbon price outlook is subject to review over time.

In the procurement of goods and services, the overarching consideration for us is ensuring the best value for money. Value for money is not necessarily the lowest price, nor is it the highest-quality goods or services. Value for money is derived from a fair and balanced assessment of a range of financial and non-financial factors, including quality, cost, fitness for purpose, capability, risk, total cost of ownership, and social and sustainability criteria, including environmental costs. By including a shadow carbon price in our decision-making criteria, this supports our investments in lower-emissions options, other things being equal.

Contact

Thank you for your interest in our report. We welcome your questions, comments and feedback. You may contact us at:

Elise Gautier, Chief Risk and Compliance Officer
elise.gautier@simsmm.com

Ana Metelo, Director, Investor Relations
ana.metelo@simsmm.com

APPENDIX

Notes on data

Additional performance detail and an outline of the organisational boundary is available in the FY22 Sims Limited Sustainability Databook, available on our [website](#).

TCFD INDEX

	Disclosure	Sims Limited's response	
Governance	Describe the Board's oversight of climate-related risks and opportunities.	FY22 Annual Report • Corporate Governance Statement (p 49-54)	FY22 Climate Report • Board engagement on climate change (p 12) • Climate change governance (p 13-15)
	Describe management's role in assessing and managing climate-related risks and opportunities.	FY22 Climate Report • Climate change governance (p 13-15) • Opportunity and risk management (p 16-17)	
Strategy	Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term.	FY22 Annual report • Corporate Governance Statement (p 49-54)	FY22 Climate Report • Our strategic approach (p 6-9) • Opportunity and risk management (p 16-17) • Processing of sold products (p 28-29)
	Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.	FY22 Annual Report • Positioned for growth (p 8-9)	FY22 Climate Report • Our strategic approach (p 6-11) • Opportunity and risk management (p 16-17) • Delivering on our ambitions (p 18-32) • Capital investment and green revenue in a 1.5°C world (p 36)
	Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	FY22 Climate Report • Our strategic approach (p 6-11) • Opportunity and risk management (p 16-17)	
Risk Management	Describe the organisation's processes for identifying and assessing climate-related risks.	FY22 Annual Report • Corporate Governance Statement (p 49-54)	FY22 Climate Report • Climate change governance (p 13-15)
	Describe the organisation's processes for managing climate-related risks.	FY22 Annual Report • Corporate Governance Statement (p 49-54)	FY22 Climate Report • Climate change governance (p 13-15)
	Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	FY22 Annual Report • Corporate Governance Statement (p 49-54)	FY22 Climate Report • Climate change governance (p 13-15) • Opportunity and risk management (p 16-17)
Metrics and Targets	Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	FY22 Climate Report • Opportunity and risk management (p 16-17)	FY22 Sustainability Data Book – Energy & Emissions tab
	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	FY22 Climate Report • Delivering on our ambitions (p 18-25) • Emissions in our value chain (p 26-35)	FY22 Sustainability Data Book – Energy & Emissions tab
	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	FY22 Climate Report • Our strategy, targets & ambitions (p 10-11) • Delivering on our ambitions (p 18-25) • Emissions in our value chain (p 26-35)	FY22 Sustainability Data Book – Energy & Emissions tab



VERIFICATION OPINION DECLARATION GREENHOUSE GAS EMISSIONS AND SELECTED ENVIRONMENTAL DATA

To: The Stakeholders of Sims Limited

Apex Companies LLC, (Apex) was engaged to conduct an independent verification of the greenhouse gas (GHG) emissions and selected environmental and safety data reported by Sims Limited (Sims) for the period stated below. This verification opinion declaration applies to the related information included within the scope of work described below.

The determination of the GHG emissions and selected environmental and safety data is the sole responsibility of Sims. Sims is responsible for the preparation and fair presentation of the GHG emissions statement and selected environmental and safety data in accordance with the criteria. Apex's sole responsibility was to provide an independent verification opinion on the accuracy of the GHG emissions and selected environmental and safety data reported and on the underlying systems and processes used to collect, analyze and review the information. Apex is responsible for expressing an opinion on the GHG emissions statement and selected environmental and safety data based upon the verification. Verification activities applied in a limited level of assurance are less extensive in nature, timing and extent than in a reasonable level of assurance verification.

Boundaries of the reporting company GHG emissions covered by the verification:

- Operational Control
- Worldwide
- Exclusions from the scope of Sims' GHG emissions assertion are:
 - Refrigerants, which were deemed immaterial

Types of GHGs: CO₂, N₂O, and CH₄

GHG Emissions and Environmental/Safety Statement:

- **Scope 1:** 68,819 metric tons of CO₂ equivalent
- **Scope 2: Location-Based:** 68,239 metric tons of CO₂ equivalent
- **Scope 2: Market-Based:** 47,775 metric tons of CO₂ equivalent
- **Total Water Consumption:** 574,150,595 liters
- **Total Waste Volume:** 1,277,764 metric tons
- **Health and Safety Data**
 - **Critical Risk Incident Rate:** 0.35
 - **Total hours worked:** 9,688 thousand hours
 - **Total recordable injuries:** 55
 - **Fatality count:** 0
 - **High-consequence injury rates (per 200,000 hours and per 1,000,000 hours)**
 - **Per 200,000 hours:** 0
 - **Per 1,000,000 hours:** 0
 - **Recordable work-related injury rates (per 200,000 hours and per 1,000,000 hours)**
 - **Per 200,000 hours:** 1.14



- **Per 1,000,000 hours:** 5.68
- **Number of lost time injuries:** 11
- **Lost time injury frequency rates (per 200,000 hours and per 1,000,000 hours)**
 - **Per 200,000 hours:** 0.23
 - **Per 1,000,000 hours:** 1.14

Data and information supporting the Scope 1 and Scope 2 GHG emissions assertion were in some cases estimated rather than historical in nature. Data and information supporting the environmental and safety assertions were generally historical in nature.

Period covered by verification:

- Fiscal Year 2022 – July 1, 2021 to June 30, 2022

Reporting Protocols against which verification was conducted:

- World Resources Institute (WRI)/World Business Council for Sustainable Development (WBCSD) Greenhouse Gas Protocol, Corporate Accounting and Reporting Standard, Revised Edition (Scope 1 and 2) and the GHG Protocol Scope 2 Guidance, an amendment to the GHG Protocol Corporate Standard
- OSHA and US Bureau of Labor Standards (Safety Data)
- Company criteria (Environmental data)

Verification/Assurance Protocols used to conduct the verification:

- ISO 14064-3 Second Edition 2019-04: Greenhouse gases -- Part 3: Specification with guidance for the verification and validation of greenhouse gas statements
- International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements Other than Audits or Reviews of Historical Financial Information (effective for assurance reports dated on or after Dec. 15, 2015), issued by the International Auditing and Assurance Standards Board

Level of Assurance and Qualifications:

- Limited
- This verification used a materiality threshold of $\pm 5\%$ for aggregate errors in sampled data for each of the above indicators.

GHG Verification Methodology:

Evidence-gathering procedures included, but were not limited to:

- Interviews with relevant personnel of Sims;
- Review of documentary evidence produced by Sims;
- Review of Sims' data and information systems and methodology for collection, aggregation, analysis and review of information used to determine GHG emissions; and,
- Audit of sample of data used by Sims to determine GHG emissions.

Environmental and Safety Data Assurance Methodology:

Evidence-gathering procedures included, but were not limited to:

- Assessing the appropriateness of the Reporting Criteria;



- Conducting interviews with relevant Sims personnel regarding data collection and reporting systems;
- Reviewing the data collection and consolidation processes, including assessing assumptions made, and the data scope and reporting boundaries;
- Reviewing documentary evidence provided by Sims;
- Agreeing a selection of the data to the corresponding source documentation;
- Reviewing Sims systems for quantitative data aggregation and analysis; and
- Assessing the disclosure and presentation of the subject matter to ensure consistency with assured information.

Verification Opinion:

Based on the verification process and procedures conducted to a limited assurance level of the GHG emissions and environmental and safety data statement shown above, Apex found no evidence that the GHG emissions statement and environmental and safety data statement:

- is not materially correct and is not a fair representation of the GHG emissions and environmental and safety data and information; and
- has not been prepared in accordance with the WRI/WBCSD GHG Protocol Corporate Accounting and Reporting Standard (Scope 1 and 2).

It is our opinion that Sims has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of the GHG emissions and environmental and safety data for the stated period and boundaries.

Statement of independence, impartiality and competence

Apex is an independent professional services company that specializes in Health, Safety, Social and Environmental management services including assurance with over 30 years history in providing these services.

No member of the verification team has a business relationship with Sims Limited, its Directors or Managers beyond that required of this assignment. We conducted this verification independently and to our knowledge there has been no conflict of interest.

Apex has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.

The verification team has extensive experience in conducting assurance over environmental, social, ethical and health and safety information, systems and processes, has over 20 years combined experience in this field and an excellent understanding of Apex's standard methodology for the verification of greenhouse gas emissions data.



Attestation:

A handwritten signature in blue ink, appearing to read 'Mary E. Armstrong-Friberg'.

Mary E. Armstrong-Friberg, Lead Verifier
Senior Project Manager
Apex Companies, LLC
Akron, Ohio

A handwritten signature in blue ink, appearing to read 'David Reilly'.

David Reilly, Technical Reviewer
Senior Project Manager
Apex Companies, LLC
Santa Ana, California

September 26, 2022

This verification opinion declaration, including the opinion expressed herein, is provided to Sims Limited and is solely for the benefit of Sims Limited in accordance with the terms of our agreement. We consent to the release of this declaration by you to CDP and/or others in order to satisfy the terms of CDP disclosure requirements or other reporting requirements but without accepting or assuming any responsibility or liability on our part to CDP or to any other party who may have access to this declaration.



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