Environment, Health, + Safety Management System Guide

VERSION III – FY26

SIMS LIMITED

Contents

Purpose and Scope

The Sims Limited EHS Management System embeds our core values—safety, integrity, respect, transparency, excellence, and social responsibility—into daily operations. It centers on protecting our workforce, visitors, and communities from environmental, health, and safety risks.

This system enhances awareness, sets clear expectations, and drives site-level continuous improvement: innovation-focused, ensuring controls remain effective and industry-leading. It supports our purpose: creating a world without waste to preserve our planet. It also reinforces leadership accountability and a commitment to a psychologically safe work environment.

As a publicly listed company on the Australian Stock Exchange, Sims aligns its EHS Management System with the Australian Work Health and Safety Act. This includes legal duties for officers, managers, and workers to manage risks and demonstrate due diligence.

JURISDICTIONAL REFERENCES

While grounded in Australian WHS legislation, this guide also supports compliance across all Sims jurisdictions, including:

- Australia: Model Work Health and Safety Act 2011
- New Zealand: Health and Safety at Work Act 2015
- Canada: Section 217.1 of the Criminal Code and associated regulations
- United Kingdom: Health and Safety at Work etc. Act 1974
- United States: Occupational Safety and Health Act (29 CFR)

This alignment ensures Sims meets or exceeds legal obligations globally, reflecting best practices from Safe Work Australia, OSHA (U.S.), and EU-OSHA. This guide also intends to address principles of environmental performance, many of which are rooted in the environmental regulations in effect across the above mentioned jurisdictions.

Responsibilities and Duties

Sims Limited's EHS responsibilities are structured to ensure legal compliance, operational safety, and continuous improvement across all jurisdictions.

SENIOR LEADERS (OFFICERS UNDER WHS ACT)

- Demonstrate due diligence by understanding EHS risks, ensuring resources are available, and investing in continuous improvement efforts to ensure risk controls are effective.
- Lead by example, embedding safety (both physical and psychological) and environmental performance into strategic decisions and culture.

MANAGERS AND SUPERVISORS

- Make EHS Standards readily available and ensure the effectiveness of control measures through consultation and worker involvement
- Through Critical Control Verifications, identify hazards, assess risks, enhance, and apply controls as per EHS Standard Requirements.
- Provide EHS training to raise employee awareness of site risks and heighten adoption of control measures. Support worker competency, assurance efforts, and verification.
- Ensure team compliance through trust-built relationships with the workforce and structured EHS communication delivery.
- Support incident reporting, investigation, and corrective actions.

WORKERS AND CONTRACTORS

- Follow EHS Standard Requirements by adopting control measures and reporting unsafe conditions.
- Participate in EHS training and learning safe working procedures.
- Exercise care for personal and others' health and safety.
- Demonstrate a culture focused on positive environmental performance, aiming to minimize our impact to air, land and water, while recognizing our commitment to better the communities we serve and operate within.

EHS PROFESSIONALS

- Develop and maintain the EHS Management System components. Enhance Standards, Delivery Systems, Training, Tools, and Communications with best-in-class details and direction, keeping up with innovations and technology.
- Monitor compliance and performance metrics.
- Advise leaders and teams on regulatory changes and best practices.

This structure supports compliance with:

- Australia's WHS Act: Officers must exercise due diligence and ensure safe systems of work.
- OSHA (U.S.): Employers must provide a workplace free from recognized hazards.
- EU-OSHA: Employers must assess risks and implement preventive measures.
- Applicable environmental regulation in applicable nations, states and local governments.

EHS Management System Components

The Sims Limited EHS Management System is a globally integrated framework designed to embed safety, health, and environmental excellence into every role and function across the organization.

FOUNDATIONAL STRUCTURE

Each component builds sequentially to:

- Increase awareness of EHS risks and responsibilities.
- Set clear expectations to work within control measure guidelines and support environmental stewardship.
- Enable control measure continuous improvement through feedback, data, and innovation.

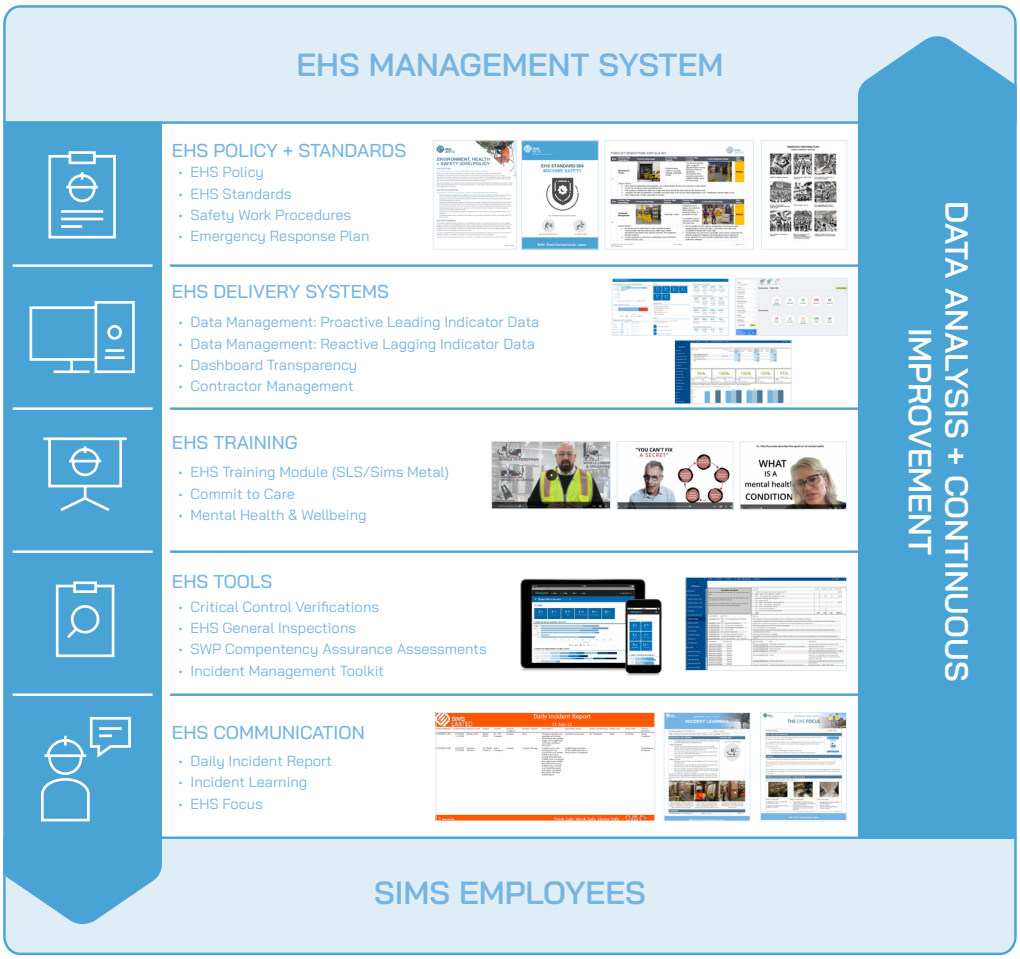
This structure applies to all personnel, including those in acquisitions, joint ventures, and newly formed entities where Sims is the operating partner.

ACCOUNTABILITY AND TRANSPARENCY

Accountability is central to the system. Transparent reporting flows from frontline employees to Senior Business Leaders, ensuring visibility and ownership of EHS performance. Transparency is accomplished through global dashboards that share individual proactive continuous improvement efforts. This supports legal obligations under:

- Australia's WHS Act: Officers must exercise due diligence.
- OSHA (U.S.): Employers must provide a safe workplace.
- EU-OSHA: Employers must assess and mitigate risks.

FRAMEWORK SUMMARY



EHS POLICY + STANDARDS

- The EHS Policy defines our commitments
- The EHS Standards outline control measure requirements
- Safe Work Procedures outline safe process steps with applied controls
- Emergency Response Plan provide guidance on various emergency scenarios

DELIVERY SYSTEMS

- Platforms are used to collect data, measure leading and lagging indicators' performance, assign responsibility
- Dashboards raise transparency and increase accountability

TRAINING

- Training modules demonstrate 'how to' work with control measures defined in EHS Standards
- Safe Work Procedure training for Competency Assurance learning
- Focused on end-user requirements and information on critical risks within the business

TOOLS

- Critical Control Verifications are designed to determine the effectiveness of Standard requirements, and challenge the status quo
- General Inspection ensure compliance to company and local requirements

COMMUNICATION

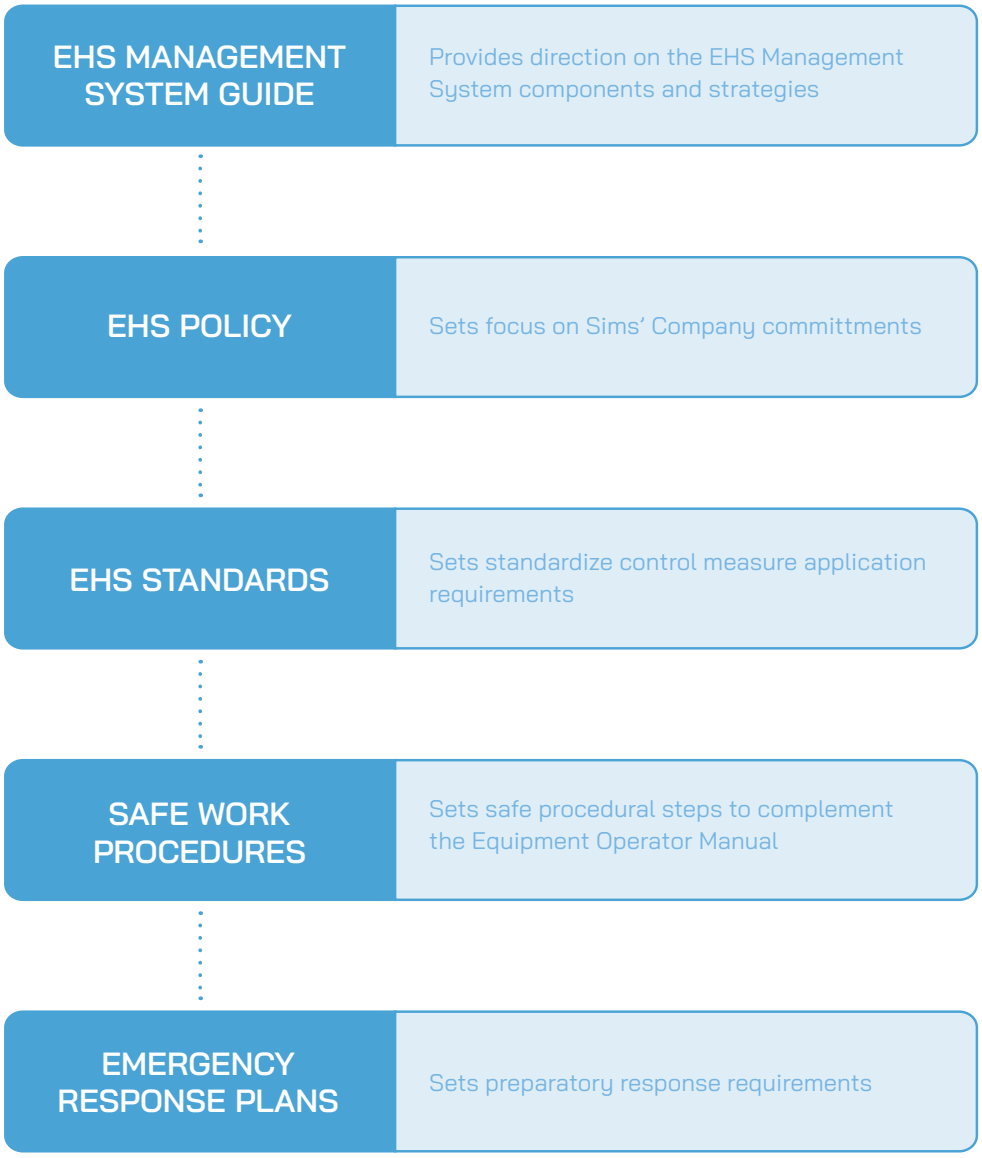
- EHS communications raise transparency and information sharing, with daily incident reports, and Incident Learning reports
- The EHS Focus pulls together all elements of the EHS Management System for managerial ease of use each month

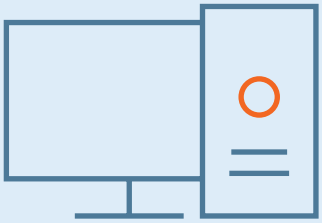
EHS GUIDANCE

- Policies: Endorsed by the Board and Executive Leadership, Sims' policies commit to eliminating or minimizing risks, with a focus on fatal risk prevention and environmental protection.
- Standards: These are pictorial and user-friendly, developed collaboratively with EHS professionals, operational leaders, and field employees to ensure clarity and relevance
- Safe Work Procedures: Complement equipment Operator Manuals (which outline equipment functionality) with site-specific process steps. These documents are learning tools coupled with SWP Competency Assurance Assessments.

HIERARCHY OF DOCUMENTS

Clarifies the purpose and authority of each provided EHS document, preventing redundancy and confusion.





DELIVERY SYSTEMS

Digital platforms centralize EHS data and support:

- Incident management (Incident/injury data collection and reporting)
- Compliance tracking (Environmental permit, licensing data collection and reporting)
- Training records (Employee EHS and Leadership training completion record collection and reporting)
- KPI dashboards (Leading Indicator proactive data collection and reporting)
- Safety Data Sheet (SDS – online site document management)
- Contractor management (Online system induction, site access, permits)

These systems are mandatory across all Sims sites and provide real-time visibility into performance and risk.

KEY PERFORMANCE INDICATORS (KPIS)

KPIs are divided into:

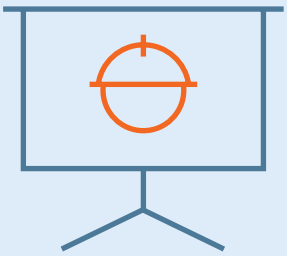
- MEASURED - Leading Indicators: Proactive measures that reduce the company's EHS risk profile.
- MONITORED - Lagging Indicators: Reactive performance outcome metrics.

Leading indicator examples include:

- Critical Control Verification (targets the evaluation of the effectiveness of current controls)
- Corrective Action Completion (targets the completion of high-risk reducing control measure application)
- Training Completion (targets the completion of assigned EHS training modules
- Critical Risk Event Potential (targets the reporting of high-risk near-miss and hazard identification)
- Environmental Task Completion (demonstrating continued compliance with permits and regulations)

Lagging Indicator examples include:

- Total Recordable Rate (injury treatment rate monitors the effect of general Leading Indicator efforts)
- Critical Risk Incident Actual (injury severity rate monitors Critical Risk Management improvement efforts)
- Regulatory Inspection & Violations
- Stormwater benchmark exceedances



TRAINING

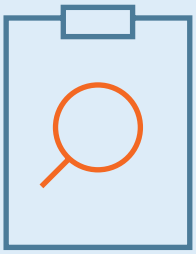
In-house video-based EHS training modules are custom-tailored to ensure understanding of EHS Standard Requirements and site expectations, including:

- Critical Risk Management (fatal risk prevention program)
- Fire Prevention (fire awareness and response)
- Traffic Management (traffic risk and control measure adoption)
- Fall Prevention (fall control measure adoption)
- Mobile Equipment
- Chemical & Liquids Management
- Stormwater Management & Pollution Prevention

Safe Work Procedures (SWPs) are core training tools used to build procedural understanding. Video modules complement SWPs to reinforce how employees should operate within defined control measures.

SWP Competency Assurance Forms outline the essential knowledge, practical skills, and capabilities required for safe task execution. Competency is tracked and documented through Sims' online learning management system, ensuring consistent validation across the workforce.

Training is managed via Sims University, which tracks completion and sends reminders. Leadership courses called Commit to Care that focus on psychological safety and trust-building are assigned to all supervisors up to the CEO.

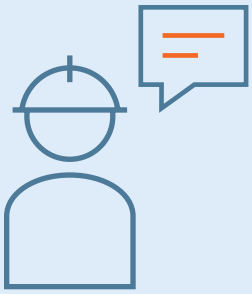


EHS TOOLS

Tools are integrated into the Leading Indicator program and support the identification and mitigation of risk, including:

- EHS Staff Site inspections (designed to ensure compliance)
- Impact and Aspect Registers (designed to raise awareness and set controls for site environmental risks)
- Hazard identification (system-based hazard reporting)
- Environmental Performance/Improvement identification
- Permits to work (authorization tool for contractors or high-risk work such as hot work)
- Incident investigation Tools (Blueline Event Gap Analysis)

These tools support continuous improvement at existing sites and target the full integration of new acquisitions.



COMMUNICATION

Communication mechanisms include:

- Daily Incident Report: an automated incident report delivering details of global incidents from the previous day. It provides increased transparency into incidents, allowing site leaders to evaluate risks on their sites.
- EHS Focus is provided monthly, pulling all components of the EHS Management System together for easy site management access and understanding. The EHS Focus outlines a company risk theme and directs leaders to the associated EHS Standard, Training module, Critical Control Verification Tool, and communication talking points.
- Incident Learning: reports critical risk incident (potential and actual) assessment findings and all learnings, including corrective actions.

These channels ensure the timely dissemination of risks, learnings, and recognition.

CONSISTENCY AND QUALITY ASSURANCE

Global consistency is achieved through:

- Incident Review Committee (EHS leadership team reviews monthly incidents to ensure risk rating and injury classification are consistent)
- Standardized risk rating tools (i.e. Incident Consequence Table)
- Internal audits

These ensure reliable data and targeted improvements.

Safety Culture

COMMIT TO CARE: LEADERSHIP PRINCIPLES AT SIMS

At Sims, leadership recognizes that a strong safety culture is essential to an effective EHS Management System. Without trust, incidents go unreported, and safety programs fail to gain traction. To address this, Sims developed Commit to Care, a leadership training program grounded in psychological safety. Its principles include:

1. **PSYCHOLOGICAL SAFETY**
   Creating a climate where people feel safe to speak up, share concerns, and admit mistakes—without fear. This requires:
   - Leadership commitment to listening and respect
   - Trust-building to avoid cynicism and disengagement
2. **FEAR LOOP VS. TRUST LOOP**
   Punitive responses suppress communication. Instead, Sims promotes:
   - Humble inquiry
   - Relationship-building
   - Learning-focused leadership
3. **BLAME VS. LEARNING CULTURE**
   Shifting from fault-finding to understanding root causes and systemic issues.
4. **WORK AS IMAGINED VS. WORK AS DONE**
   Leaders engage with frontline teams to bridge the gap between procedures and real-world execution.
5. **COURAGEOUS COMMUNICATION**
   Using language that builds connection and avoids defensiveness. Leaders operate from an "Adult Ego State," speak openly, and address issues directly.
6. **CONTROL AND INFLUENCE**
   Encouraging individuals to recognize their ability to influence outcomes—building resilience and accountability.
7. **AUTOPILOT AWARENESS**
   Acknowledging human error and habitual behaviour when designing control measures.
8. **ABOVE-THE-LINE THINKING**
   Promoting ownership, curiosity, and proactive behaviour—rather than blame or denial.

By embedding these principles, Sims fosters:

- Continuous safety improvement
- Open incident reporting
- Engagement in safety initiatives without fear of reprisal

EVENT MANAGEMENT

At Sims, incident management is rooted in culture. To reflect this, traditional incident/investigation terminology has been replaced with Event Management, emphasizing learning over blame.

Sims does not conduct investigations or collect witness statements. EHS and operational personnel are not enforcement agents—they do not seek fault but focus on understanding and improvement.

Instead, Sims applies the Event Gap Analysis method, which compares:

- Work as Imagined: EHS Standards and Safe Work Procedures
- Work as Normal: How tasks are typically performed
- Work as Done: What actually occurred during the event

This approach helps teams identify gaps between expectations and reality. Once these gaps are understood, EHS and Operations collaborate to strengthen control measures and prevent recurrence.

Risk Management

Risk Management is part of the normal operating rhythm for Sims' operational business leaders and their teams, who are accountable for and apply risk management to all aspects of operations.

CRITICAL RISK MANAGEMENT

Sims Limited's Critical Risk Management (CRM) program targets activities with the potential to cause fatal or life-altering injuries. It is the cornerstone of our safety strategy and applies across all operating businesses—from offices to yards and facilities.

PURPOSE

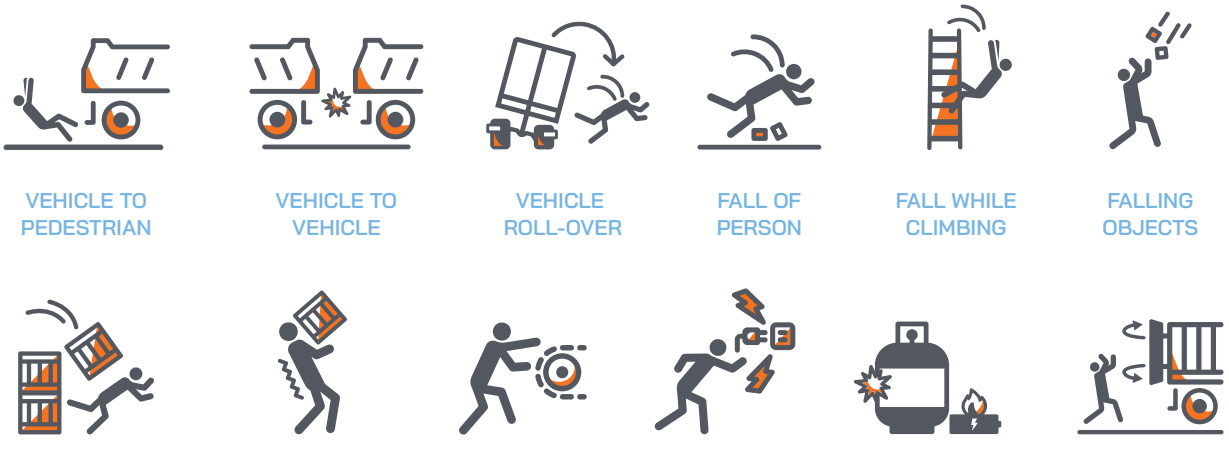
The CRM program is designed to:

- Prevent fatal and disabling injuries.
- Protect employees, contractors, and visitors.
- Promote a culture of vigilance and accountability.

APPROACH

Sims has identified 12 critical risks based on over a decade of incident data. These risks represent the most frequent and severe hazards in our operations.

Each risk is managed through Critical Controls—non-negotiable measures proven to prevent serious harm. These controls must be understood, implemented, and verified by all personnel.



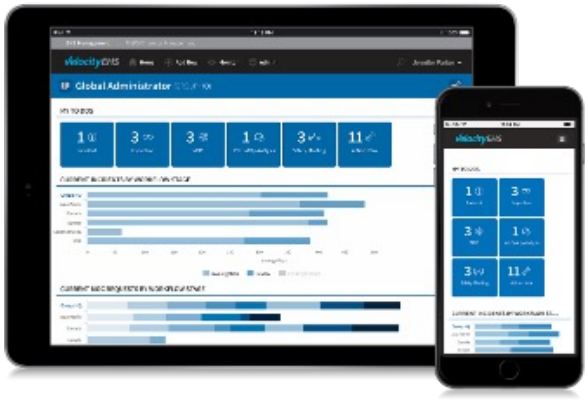
VEHICLE TO PEDESTRIAN | VEHICLE TO VEHICLE | VEHICLE ROLL-OVER | FALL OF PERSON | FALL WHILE CLIMBING | FALLING OBJECTS

STACKED AND STORED MATERIALS | MANUAL TASKS | ROTATION AND MOVING PARTS | ELECTRICAL ENERGY | HAZARDOUS ENERGIES | COMPRESSION ENERGY

VERIFICATION AND CONTINUOUS IMPROVEMENT

Senior leaders, managers, and supervisors conduct Critical Control Verifications—targeted micro-inspections that confirm controls are in place and effective. Data from these verifications is used to:

- Assess control design and performance.
- Identify opportunities for improvement.
- Standardize best-in-class controls globally.



This proactive approach ensures Sims remains compliant with:

- Australia's WHS Act: Mandating risk identification and control.
- OSHA (U.S.): Requiring hazard-specific protections.
- EU-OSHA: Emphasizing preventive measures and worker involvement.

EMERGENCY RESPONSE

Sims Limited maintains Emergency Action Plans (EAPs) at every facility to manage all phases of potential emergencies. These plans are tailored to site-specific risks and outline the controls, roles, and communication protocols required to respond effectively.

Each EAP includes:

- Site-specific hazards and response measures
- Defined roles and responsibilities
- Escalation procedures, including notification of senior leadership and Corporate Communications
- Regular testing through drills, alarm checks, and equipment inspections

The Fire Prevention and Response Standard provides additional guidance on fire-related emergencies, including suppression systems and evacuation protocols.

In crisis situations, a regional or global response team—comprising EHS, HR, Legal, Communications, and Operations—will coordinate control measures and communication. Depending on the scale, updates are shared via direct communication and posted on the EHS intranet.

Operations—will coordinate control measures and communication. Depending on the scale, updates are shared via direct communication and posted on the EHS intranet.

All employees and visitors are trained in emergency procedures relevant to their location and role. Plans are reviewed and updated regularly to ensure compliance with:

- Safe Work Australia WHS Regulation 43: Emergency procedures, evacuation, medical response, and communication
- OSHA 29 CFR 1910.38: Emergency action and fire prevention plans
- EU-OSHA: Risk-specific emergency planning and worker training

OCCUPATIONAL HEALTH MANAGEMENT

Sims addresses diverse occupational health risks through Group EHS Standard 015 and site-specific protocols. These include, but are not limited to:

EXPOSURE MONITORING

- Fixed and mobile systems monitor noise and dust levels.
- Controls include hearing conservation programs, respiratory protection, and training.

MATERIAL HAZARDS

- Inbound materials are screened for asbestos, blood-borne pathogens, and radiation.
- Acceptance protocols and inspections are enforced at all sites.

THERMAL STRESS

- Employees are trained to recognize and manage heat and cold exposure.
- Preventive measures include temperature monitoring, hydration, rest breaks, and PPE.

These programs are supported by awareness training, site-specific guidelines, and continuous monitoring to ensure compliance and protect worker health.

ENVIRONMENTAL MANAGEMENT

Sims Limited integrates environmental stewardship into its global operations through dedicated regional environmental professionals. As each region operates in differing regulatory climates, each region utilizes their own Environmental Management System or Process. These professionals support Operational leadership, ensure continuous improvement, regulatory compliance, and alignment with our purpose to create a world without waste.

PROGRAMMATIC TASKS

Regional environmental professionals support site teams in meeting federal, state, and local compliance obligations by performing tasks included, but not limited to, the list below;

- Use the EHS data management system to log and manage external regulations, permits, and any applicable compliance action items, to track regulatory visits and potential enforcement, and to conduct internal inspections.
- Provide guidance on the implementation of best management practices for all environmental media, such as stormwater management.
- Review, negotiate and agree to any new permit/license conditions, engage in formal regulatory communications, and lead/support regulatory visits.
- Maintain key site environmental documentation, such as permit-specific management plans
- Maintain pertinent environmental documentation in an organized filing system, such as monitoring data.
- Support response to any environmental incidents.

KEY FOCUS AREAS

All environmental documentation and controls in key areas of focus include:

- Spill prevention and countermeasures
- Fuel and oil containment
- Hazardous material handling
- Surface water management
- Air management
- Wastewater management
- Radiation detection
- Dust control
- Waste disposal
- Community concern reports


SIMS
LIMITED