



SIMS METAL MANAGEMENT SAFETY AND HEALTH POLICY

This is Sims MM's Safety and Health Policy which is one of the three pillars of its Safety, Health, Environment & Community (SHEC) Policy. This Safety and Health Policy will be implemented through plans (including standards and systems) covering the Sims MM operations in line with key safety and health goals.

Safety and Health Commitment

Sims MM will provide a safe and healthy work environment for all its employees, contractors, visitors and suppliers. The safety of an individual comes before all other considerations and Sims MM will manage its activities with this foremost in mind. As a minimum, Sims MM will comply with all relevant occupational safety and health requirements, including applicable rules, regulations and standards, in all the jurisdictions in which it operates, but will strive to achieve levels of performance which exceed basic compliance.

Safety and Health Policy

1. Safe Place and System of Work

Sims MM will ensure that the safety and health of its managers, staff and contractors comes before all other considerations. Sims MM will provide sufficient staff and monetary support, including the use of external consultants as required, to ensure that best safety and health practices exist in all its operations.

Sims MM will maintain sound general working conditions at all times through the provision of adequate, healthy and safe facilities.

Sims MM's managers will be directly responsible for ensuring that:

- a safe and healthy place of work exists;
- a safe system of work exists; and
- staff are trained and supported in the safe performance of their assigned tasks.
- staff and contractors will be expected to:
 - follow all safe work practices and procedures;
 - report unsafe conditions and/or practices;
 - suggest improvements relating to safety and health; and
 - look out for their own safety and that of other persons at work, including visitors and suppliers.

Sims MM will actively support the concept of rehabilitation and support of injured employees.

2. Continuous Improvement

Sims MM will seek continuous improvement in all safety and health aspects of its operations and will seek to eliminate the risk of injury through the integration of safety and health considerations with all operational activities, supported by appropriate risk management principles and tools.

Risk assessments will be carried out as required and will be an integral consideration when new businesses and plant are purchased or when the positions of relevant employees change.

3. Consultation

Sims MM's managers will regularly consult with staff and elected staff safety representatives or safety committee members on health and safety matters.

4. Awareness, Training and Reporting

Sims MM will ensure that all managers and relevant staff, contractors and advisors understand the importance of this Safety and Health Policy and its impact on them and on the reputation of Sims MM's business. It will, where appropriate, progressively link the pay of relevant staff with performance against goals set out in the plans which implement this Safety and Health Policy.

Sims MM will train all of its managers and its relevant staff and contractors in this Safety and Health Policy and the plans, procedures and codes which support it. Sims MM will publish an annual report on its performance against the goals set out in its safety and health plans. Where practicable, that report will comment on Sims MM's performance against accepted safety and health standards and relevant benchmarks, including those of well recognised safety and health indices and reporting organizations.

5. Safety and Health Policy Review

Sims MM will ask both internal and appropriately qualified independent external auditors to progressively and randomly assess the performance of all business units against this Safety and Health Policy and the plans by which it is implemented. The headline results of these audits will form part of its annual reporting on safety and health matters.

The Sims MM Board of Directors (Board) will review the appropriateness of this Safety and Health Policy (and the efficacy of the plans prepared to implement it) at least every 2 years after reviewing a report on the effectiveness of the Policy from the Board SHEC Committee.

All significant capital expenditure and business disposal decisions will be assessed against this safety and health commitment.