



Security Policy

Global SRS

SEC-COR-POL-01

Introduction

Sims Recycling Solutions (SRS) specializes in the recycling of waste electrical and electronic equipment, IT asset management involving the secure data eradication and the servicing, refurbishment and reuse of electrical and electronic equipment, including those services provided on-site at Client's facilities.

Policy

Sims Metal Management (SMM) has an over-arching Information Security Policy, designed to protect its Information Assets to ensure:

- the confidentiality of Company, Client and Customer Information,
- privacy of personal information (in accordance with law),
- integrity and availability of Information Assets when needed for Company purposes,
- prevention of inappropriate use of or unauthorized access to Facilities / Information Assets,
- compliance with law and contractual obligations,
- the security of all Information Resources,
- appropriate controls based on the input/output of a formal risk assessment process,
- continual review and improvement through a robust governance process, including the setting of objectives, and
- to provide a framework of management and controls to reduce security risks in the organization.

The purpose of the SMM Information Security Policy is to set forth the Company's expectations of its Employees and requirements regarding the protection of its Information Assets and use of the Internet and Email System, and to clarify responsibility for ensuring those expectations and requirements are being met, as well as to clarify that there should be no expectation of privacy with respect to communication by means of Information Resources.

In support of the SMM Information Security Policy, Sims Recycling Solutions has a set of Protocols and supporting Procedures designed to protect its facilities from unauthorized access and its employees and property from damage or harm. These Protocols/Procedures are approved by management and communicated to employees and external parties.

Prior to using a sub-contractor, and in combination with other evaluations, a physical audit will be carried out to determine the risks associated with the sub-contractor and what security controls they must have in place. Sub-contractors, who perform services on our behalf, are required to be compliant with the ethos of this Policy.

Commitment

We are committed to supporting all of the above through effective leadership, procedures, management systems, training and accountability at all levels and making employees and contractors aware of this Policy, its impact on them and on the reputation of our business. Management will demonstrate its commitment through participation in Management Reviews and will be responsible for monitoring and reviewing performance measures.

Steve Skumac
President – Sims Recycling Solutions

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10/06/2016	01	K Mills / SHECS + Q&S	Steve Skumac / President	1 of 2
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Environment, Health and Safety (EHS) Policy

Global SRS

SHEC-COR-POL-01

Sims Recycling Solutions is committed to the goals of sustainable development. We balance social, environmental and economic considerations in how we manage our business. We are committed to the principles of protecting workers' basic human rights, accountability of all materials and by-products to final disposition, prohibition of prison labor use and exports that violate the Basel Convention.

Management has prime responsibility for managing environmental, and health and safety programs. Supervisors are responsible for ensuring a healthy and safe working environment for employees under their direction. All employees are responsible for working safely and in compliance with the law and all Sims Recycling Solutions requirements.

To implement this policy and show its commitments to the protection of the environment, the health and safety of its workers, and its management of end of life electronic, according to the reuse, recover, disposal hierarchy, Sims Recycling Solutions will:

STRIVE to be leaders in environment, health and safety management by minimizing our impact on and risks to our employees, the public, our communities, our customers and the natural environment, throughout all stages of our business activities.

MAINTAIN and promote stewardship, reuse, recycling and waste minimization programs to benefit and protect employees, the public, customers and the environment.

MEET or surpass applicable environmental, health, hygiene, safety, emergency preparedness and response legislation, and other requirements to which the company subscribes.

ENSURE that improvements in safety, health, and well-being of all employees will be a major consideration in all workplace designs, equipment purchases, training programs and work procedures.

ESTABLISH clear and meaningful objectives and targets for environment, safety and health management activities.

PROMOTE employee awareness of this policy, and provide the necessary resources for employees to integrate environment, health and safety into their activities.

IMPLEMENT management systems to address risks, pollution prevention, environment, health and safety, and energy efficiency and perform regular audits to ensure continuous improvement.

COMMUNICATE our progress openly and on a timely basis with employees, the public, governments and other communities of interest, and our data security principles with our customers.

FACILITATE dialogue with external parties in order to anticipate and address relevant issues of sustainability and the protection of basic human rights.

PREVENT injuries and ill health to our employees, contractors, and visitors while working to achieve a zero harm workplace.

Stephen Skumac
President – Sims Recycling Solutions

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QUALITY POLICY

Global SRS

QMS-COR-POL-01

Introduction

Sims Recycling Solutions (SRS) specializes in the recycling of waste electrical and electronic equipment, IT asset management involving the secure data eradication and the servicing, refurbishment and reuse of electrical and electronic equipment, including those services provided on-site at Client's facilities.

Our Policy

It is the overall goal of the SRS to better serve our customer by continuously taking action to improve the quality of our processes, products and services and it is our intention to:

- Implement, maintain and improve our Integrated Management System (IMS) and this Quality Policy;
- Use risk based principles to manage the inputs and outputs to our IMS and all of its components.
- Set defined objectives and targets which are measurable;
- Provide adequate resources to support this Policy;
- Communicate this Policy to all SRS employees via training and postings throughout our Facilities;
- Assure procedures are in place to verify the accuracy of test methods, testing equipment, and maintaining records of effective testing methods;
- Utilize sound strategy in determining the sales prices of material, components and equipment;
- Work with our entire recycling chain including clients, downstream vendors, suppliers, customers, and contractors to fulfill our quality, security, environmental, health and safety goals;
- Comply with all relevant regulations of the countries importing equipment, components, or materials that have passed through our facility or control.

We recognize that the responsibilities for Quality are shared by our all of our employees and as such all of our employees must strive to meet and when possible to exceed our customer expectations.

SRS suppliers and sub-contractors, who perform services on our behalf, are required to be compliant with the ethos of this Policy. All interested parties may have a copy of this Policy, as a statement of intent on the part of SRS to meet Client and Customer expectations.

Our Commitment

We are committed to supporting all of the above through effective leadership, procedures, management systems, training and accountability at all levels and making employees and contractors aware of this Policy, its impact on them and on the reputation of our business. Management will demonstrate its commitment through participation in Management Reviews and will be responsible for monitoring and reviewing performance measures.

Steve Skumac
President – Sims Recycling Solutions

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