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INTRODUCTION

Sell & Parker have been operating since 1966 and have since become one of Australia's leading and largest scrap metal businesses. We are buyers, processors, recyclers and sellers of all grades and all quantities of ferrous and non-ferrous metals. Sell & Parker remains a proud Australian family-owned private company.

The Sell & Parker group has over 400 employees with operations across New South Wales, Victoria, the Northern Territory, and Western Australia. With its growth over the years built on strong and enduring relationships with Australian suppliers and customers both locally and abroad.

Sell & Parker is subject to the *Modern Slavery Act 2018* (Cth) (**Act**) that commenced operation on 1 January 2019. The Act requires reporting entities subject to the Act, to produce an annual modern slavery statement.

Our supply chain includes the sale of products and the purchase of products and services needed for the businesses day-to-day operations including metal, machinery, office supplies, employment and training of staff, leasing of office space, IT infrastructure and support services and travel. Sell & Parker's Finance & Administration and People & Culture teams have policies in place that support our day-to-day operations to ensure all staff and suppliers meet Sell & Parker's core values.

OUR COMMITMENT

Sell & Parker is committed to upholding human rights and reducing the risk of modern slavery. Our drive for equity informs our procedures throughout our operations and defines who we work with at every stage of our supply chain. Sell & Parker's approach to upholding human rights is informed by the International Labour Organisation's Labour Standards and the Global Slavery Index.

As part of our commitment to operating lawfully and ethically it is a requirement that suppliers and customers are equally aligned with our approach of respecting human rights. Suppliers and customers should operate in accordance with applicable modern slavery laws and actively mitigate risks of human slavery and slavery like practices, human trafficking, and child labour. Sell & Parker values its corporate social responsibility, environmental and workplace safety protection, and staff inclusion and diversity. We aim to promote the awareness and identification of modern slavery through our policy to protect whistleblowers, our Supplier's Code of Conduct, and our independent hotline for staff and suppliers to use.

This statement was approved by the Board of Sell & Parker on 21 December 2023.


Luke Parker (Dec 21, 2023 17:15 GMT+11)

Luke Parker



Morgan Parker

REPORTING ENTITIES

Identify the reporting entity

This Modern Slavery Statement (**MSS**) was prepared by the reporting entity, Sell & Parker Pty Ltd ACN 000 101 315 (**Sell & Parker, the Company**) and its wholly owned subsidiaries (collectively, **Subsidiaries**):

Sell & Parker Metal Recycling Services (NT) Pty Ltd ACN 165 602 282

Sell & Parker Metal Recycling Services (WA) Pty Ltd ACN 165 602 933

Sell & Parker Secure Destruction Pty Ltd ACN 146 827 134

Sell & Parker (International) Pty Ltd ACN 090 604 416

Oxycut Operations Pty Ltd ACN 085 011 310

Battery Recyclers Pty Ltd ACN 669 683 649

Allthread Industries Pty Ltd ACN 629 723 726

First Forge Australia Pty Ltd ACN 629 723 557

This MSS also covers Sell and Parker's affiliate, Australian Frontline Machinery.

Sell & Parker's registered office is 11 Meadow Way, Banksmeadow NSW 2019.

This is a single joint statement on behalf of Sell & Parker, its owned and controlled entities and affiliate made in compliance with the reporting requirements in Section 14 of the Modern Slavery Act 2018 (Cth) (**Act**) and outlines the actions taken by Sell & Parker to identify, assess, and address modern slavery risks across its operations and supply chains for the Company's financial year ending 30 June 2023.

STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Describe the structure, operations, and supply chain of the reporting entity

Our Structure, Operations and Supply Chain

Sell & Parker have a number of commercial business activities within its group. We have relationships with external businesses to source materials for our business and the majority of our suppliers are Australian businesses, and all of our suppliers must comply with all relevant legislation and international standards as relevant to their industry.

Our supply chain can be distinguished into suppliers and customers. Our inputs come from suppliers, who are a mixture of casual suppliers and dedicated suppliers. Casual suppliers are often sole proprietors or family businesses who sell scrap materials from goods discarded during the course of their work. Dedicated suppliers are often scrap dealers, who supply scrap material in greater amounts by reselling purchased scrap with minimal value adding. Industrial suppliers are also dedicated suppliers and sell the waste created through their operation. Suppliers are expected to adhere to Sell & Parker's Code of Conduct to ensure they are compliant with human rights and modern slavery legislation. Our outputs consist of processed metals, which are sold both domestically and exported to customers overseas. For the purposes of this statement, our key entities, operations and associated supply chains are set out below.

AREA	MAIN OPERATIONS	SUPPLY CHAIN
	▪ Purchase of scrap metal, processing, recycling and sales. ▪ Sales and marketing. ▪ Finance, Property and procurement. ▪ Internal technology and data. ▪ Commercial Governance and investments.	▪ Office consumables, and promotional merchandise. ▪ Technology (hardware, software and cloud services and mobiles). ▪ Utilities and professional services consultants who provide services directly to Sell & Parker. ▪ Uniform, PPE and work attire. ▪ Tools, machinery, spare parts (which may be sourced from overseas). ▪ automotive requirements (vehicles, tyres, fuel, spare parts). ▪ local manufacturers, demolishers and landfills. ▪ Products which we purchase, process and on-sell to customers (ferrous and nonferrous metals, bolts, batteries, floc) may be sourced or sold overseas such as India, South Korea, China). ▪ Contractors and subcontractors who deliver services.
	▪ Destruction by shredding, melting, shearing, cutting or burying. ▪ ISO 9001 Quality Management Systems Certification ▪ Member of the Commonwealth scrapping panel.	
	▪ NSW official return partner for NSW Return and Earn Scheme offering manned high speed and reliable container return services to business and the general public.	
 Battery Recyclers	▪ Accredited B-cycle collector. ▪ Operates battery sorting facilities featuring an automated X-ray scanning system. ▪ System categorises lithium, Alkaline, and Ni-cad batteries based on their internal chemistries, directing them to suitable recyclers.	▪ Handheld batteries are gathered from B-cycle Drop Off Points and public drop-off locations.
	▪ Steel plate profiling services in NSW through oxycut, plasma, and laser cutting technology. ▪ Owns and operates Australia's largest steel cutting laser machine with CNC control system to deliver jobs requiring absolute precision, high speed, and volume, reliably.	▪ We use local commercial partners for the supply of steel plate and we arrange and manage bending, pressing, rolling and additional machining as well as the supply of components from local suppliers.
	▪ Made to order bolts that utilise the thread rolling manufacturing process to provide bolt solutions for OEM, construction, mining, energy, and infrastructure. ▪ Supplies components integral to the construction of wind farms including bolts and anchor cage solutions to connect the Tower and Foundation Pad (partnering with Precision Oxycut).	▪ Local steel manufacturers are used when sourcing materials for the manufacturing processes.
	▪ Specialised importer of high-quality engineered fasteners.	▪ With Suppliers from Europe, Korea and USA. First Forge Australia Pty Ltd is partnered with the Vescovini Group, which is among the industry leaders in Europe for sales of premium fasteners.
	▪ Sale of ex-Military (army, navy & air force) vehicles, vessels and equipment via online auctions.	▪ Direct from the Australian Defence Force.

MODERN SLAVERY RISKS

Describe the risks of modern slavery across the operations and supply chain of the reporting entity

Our Approach

Sell & Parker have zero tolerance for any form of slavery like practices throughout our group and its supply chains. We acknowledge that without a robust and thorough approach to tackling modern slavery, there is a risk that human trafficking may occur within various areas of our business including procurement, our supply chain, and employment on our partners sites. Sell & Parker does not tolerate modern slavery and expects organisations we do business with to hold the same values.

Sell & Parker recognises the risk of modern slavery that may *caused* by its own practices, *contributed to* by a supplier, or *linked to* it as part of our supply chain.

Areas of Risk

Sell & Parker have identified areas at risk of modern slavery, trafficking and labour exploitation in our operations and at multiple points throughout our supply chain. Multiple factors were considered throughout risk identification, including the level of vulnerability to modern slavery in all its forms of our own employees as well as those employed by companies with which Sell & Parker does business. External datasets and assessments of modern slavery in other countries were also used to determine the risk of Sell & Parker facilitating modern slavery through import of supplies and export of scrap metals.

Operations Risk

Our industry can be hazardous due to the use of heavy machinery. Without proper training and hazard reduction, young employees may be subject to labour considered likely to harm the health and safety.

Assessments of modern slavery risk in our non-core operations have identified outsourced services such as cleaning to be areas of vulnerability. These services are outside Sell & Parker's scope of direct monitoring and may be subject to workplace hazards within our sites without the training for safety and mitigation of modern slavery risk that our employees undergo. Outsourced services that occur on our sites are also not as able to access our whistleblower and grievance services for modern slavery identification and reporting

Customer Risk

Exports are an area of particular vulnerability as overseas companies are beyond the day-to-day visibility of Sell & Parker and outside the scope of Australia's legislative protections against modern slavery.

In cases where our customers are located in countries that are deemed to have high rates of modern slavery, poor action plans, and ineffective legislation designed to reduce exploitative labour creates, there is a risk that Sell & Parker could be linked to modern slavery by selling to companies at the end of our supply chain in those locations.



Our use of sea routes for import of supplies and export of metals also presents a risk of being linked to modern slavery through human trafficking, were a charter vessel to be used for smuggling migrants by sea.

Sell & Parker conducts business with companies in many different countries, some of which have been identified as having a high prevalence of modern slavery under the Global Slavery Index. We strive to identify modern slavery risks when conducting business in these countries and work to reduce our involvement in exploitative labour. We do this by visiting our customers and witnessing first hand their business operations.

Supplier Risk

Suppliers underpaying or controlling the rights of employees is an identified risk of Sell & Parker contributing to modern slavery. Particularly as our casual suppliers partly consist of family businesses, which are in a unique position to exploit the trust and vulnerability of their employees without measures for internal monitoring for modern slavery. Many of the employees of our suppliers of scrap metals hold labour-based roles and correspondingly are not required to have undergone tertiary education and training on modern slavery. These individuals may be vulnerable to modern slavery as they may lack the knowledge to identify modern slavery where it is occurring or to find the avenues for support where they are available. Labour-based employees may also be dependent on the work of the supplier due to not having the opportunities to up-skill that other individuals may enjoy.

ASSESSING AND ADDRESSING MODERN SLAVERY RISKS

Describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes

Due Diligence Procedures

Sell & Parker have commenced conducting due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery. In addition, that they have appropriate policies in place to tackle modern slavery and that pay their employees any prevailing minimum wage applicable within their country of operations and that they regularly monitor and review the working conditions of their employees.

Addressing the Risk of Modern Slavery Practices

We are incorporating our approach to address the various risks of modern slavery in our Group Compliance Framework and assurance processes, as well as our terms and conditions of business. This will ensure that our organisation has robust and effective processes that are firmly embedded in how we do business.

Mitigation of Potential Risks in our Operations and Supply Chains



Our Policies and Procedures

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:



Corporate Social Responsibility Policy, which outlines how we will work in the best interests not only of our staff and stakeholders, but of the communities we work within, of society as a whole and of the environment.



Whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisal.



Code of Conduct applies to all Sell & Parkers group employees in pursuing the highest ethical standards, efficient business operations and safety in the interest of the business, customers, and communities within which we operate.



Equal Opportunity Policy which is to ensure equal opportunities for all workers, job applicants, client and customers, irrespective of characteristics protected under legislation; ethnicity, colour, race, nationality, or ethnic origin, marriage or civil partnerships, gender or gender reassignment, pregnancy and maternity age, religion or belief, disability, and sexual orientation. The policy also sets out our stance on valuing a diverse workforce and customer base.

During this reporting period, Sell & Parker has taken steps to reduce the risks of modern slavery throughout our organisation and supply chain by implementing comprehensive training including modern slavery awareness.



Training includes the use of proper personal protective equipment and how to ensure safety around potentially dangerous heavy machinery. Sell & Parker's internal LITMOS Learning Management System is utilised to deliver top of the line training to employees to maximise risk reduction. Hazard reduction is routinely undertaken by removing all sources of potential harm that are not immediately essential to the task at hand. These strategies reduce the risk of harm to the health and safety of employees and promote an appreciation of human rights and an understanding of modern slavery in employees.

We are dedicated to reducing the risks of modern slavery by only conducting business with suppliers who are ethically and socially responsible. Requiring adherence to Sell & Parker's standards and procedures through our Supplier's Code of Conduct helps address modern slavery risks. As part of our Code of Conduct, suppliers are expected to take all reasonable efforts to ensure that businesses within their supply chain are not engaged or complicit with human rights abuses, including forced labour and child labour. Suppliers are also expected to manage and review workplace hazards and provide training appropriate to employees.

Sell & Parker conducts due diligence on suppliers, enabling them to become a preferred supplier if they are sufficiently able to demonstrate both an intent to reduce modern slavery and steps taken towards doing so. This procedure of due diligence includes verification that the suppliers have not been convicted of offences relating to modern slavery, pay their employees no less than the minimum wage applicable within their country of operations, and regularly monitor and review both the working conditions of their employees and their policies to manage modern slavery risks.

ASSESSING EFFECTIVENESS

Describe how the reporting entity assesses the effectiveness of its actions

Sell & Parker utilises multi-step assurance procedures to ensure that policies against modern slavery and labour exploitation are properly implemented and followed.

At the first level, operation managers are responsible for training and daily hazard reduction on-site to reduce the risk of harm to employees. All staff are informed of the procedures for whistleblowing and grievance reporting and are encouraged to give feedback on their effectiveness. Employees are encouraged to identify observable modern slavery and exploitative labour risks for data collection and assessment of policy effectiveness.

At the second level, collected data is utilised by internal review processes to assess the effectiveness of existing modern slavery risk reduction mechanisms. Where current policies and procedures are inadequate, management collaborate to generate new procedures that incorporate collected data to strengthen processes for risk reduction. Reported grievances and cases of whistleblowing are investigated to alleviate identified problems and risks. Staff training is tracked to ensure that appropriate training has been undertaken and has been effective at mitigating workplace hazards and creating a work environment with a minimal risk of harm to health and safety.

At the third level, independent analysis is routinely conducted to obtain third-party assurance that risk management procedures are effective. This includes safety audits which are conducted to ensure that training and hazard reduction methods guard younger employees who are more vulnerable to exploitative labour and modern slavery from unsafe working conditions.

CONSULTATION GOVERNANCE

Describe the process of consultation with any entities that the reporting entity owns or controls

Sell & Parker owns and controls the Subsidiaries and operates under a common central governance framework and common management system.

Notwithstanding the common governance structure (i.e. the same individuals represent each of the entities across the corporate group on their respective boards), Sell & Parker has actively consulted with its subsidiaries through their management teams as to what policies are being implemented to reduce the risk of modern slavery and what their expected effect will be.

OTHER RELEVANT INFORMATION

Provide any other information that the reporting entity considers relevant

Future Commitments

Over the next year, our key focus areas will be



Reviewing and updating our suite of risk-related policies and governance control measures, including establishing a standalone modern slavery policy;



Updating our terms and conditions and issuing a supplier code of conduct where our suppliers are required to confirm that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.



We will begin stakeholder engagement on this issue, including delivering appropriate awareness training sessions on modern slavery principles to relevant Sell & Parker staff, and our key suppliers as appropriate; and



Incorporating requirements into existing assurance processes.

