



**SELL & PARKER**  
SINCE 1966



**MODERN SLAVERY STATEMENT FY24**





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## ACKNOWLEDGEMENT

Sell & Parker Pty Ltd acknowledges the First Nations peoples of the lands on which we live and work. We honour their ongoing connection to land, waters, and culture, and we pay our respects to Elders past and present.

## A MESSAGE FROM OUR DIRECTORS

We are proud to share the Modern Slavery Statement FY24 for Sell & Parker Pty Ltd, highlighting our continued commitment to addressing modern slavery risks within our operations and supply chains.

At Sell & Parker, respecting human rights and practicing responsible business is central to our operations and we are 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. Guided by our core values, we recognise the importance of our employees, customers, suppliers, and the communities we serve in fostering ethical and sustainable operations.

We are dedicated to building strong relationships throughout our supply chains, conducting thorough risk assessments, and providing training to effectively identify and address modern slavery risks. By doing so, we aim to strengthen the resilience of our supply chains and ensure that dignity and respect are upheld for everyone connected to our business.

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.

We would like to express our gratitude to the team at Sell & Parker for their hard work and dedication in advancing our modern slavery initiatives. By caring for our people, contractors, and partners, we are better equipped to identify risks, take decisive action, and enhance our practices for a stronger future.

This Modern Slavery Statement was approved by the Board of Sell & Parker on 23 December 2024.

  
Luke Parker (Dec 23, 2024 09:54 GMT+11)

**Luke Parker**

*Morgan Parker*

**Morgan Parker**

## INTRODUCTION

Sell & Parker has been operating since 1966 and has 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 450 employees with operations across New South Wales, Victoria, the Northern Territory, and Western Australia. Its growth over the years is 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 business' day-to-day operations including metal, machinery, office facilities and supplies, employment, and training of staff, 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.

## 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 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 2024.

## 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 several 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 as part of their operations. 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. Our key entities, operations, and associated supply chains are set out below.

## Metal Recycling



#### Sell & Parker

##### Operations:

This venture focuses on the recovery and processing of scrap metal, ensuring waste materials are repurposed sustainably.

##### Supply Chains:

- Collection of scrap materials
- Transportation to recycling facilities.
- Processing and destruction
- Products 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).

#### Secure Destruction

##### Operations:

Provides certified destruction services for sensitive materials like outdated machinery, vehicles, or proprietary items.

##### Supply Chains:

- Material collection (secure logistics for sensitive items).
- Shredding and destruction facilities.
- Material processing (metals sorted and recycled).
- Sale of recovered materials.

#### Return and Earn

##### Operations:

NSW official return partner for NSW Return and Earn Scheme offering manned high speed and reliable container return services to business and the public.

##### Supply Chains:

- Consumer collection points (reverse vending machines).
- Transport to recycling centres.
- Sorting of materials (plastics, glass, metals).
- Redistribution to manufacturers.

#### Battery Recyclers

##### Operations:

Accredited B-cycle collector. Operates battery sorting facilities featuring an automated X-ray scanning system, which categorises lithium, Alkaline, and Ni-cad batteries based on their internal chemistries.

##### Supply Chains:

- Handheld batteries are gathered from B-cycle Drop Off Points and public drop-off locations.
- Collection bins in community hubs or business partners.
- Transport to recycling plants.
- Recovery of metals (e.g., lithium, lead) for resale or reprocessing.

## Manufacturing

**PRECISION OXYCUT**  
PLATE PROCESSING

**ALLTHREAD INDUSTRIES**

**FIRST FORGE**  
AUSTRALIA

### Precision Oxycut

#### Operations:

This venture focuses on industrial production, supplying precision-engineered products and components for various industries.

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.

#### Supply Chains:

- Procurement of raw materials.
- 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.
- Manufacturing processes.
- Local steel manufacturers are used when sourcing materials for the manufacturing processes.
- Quality assurance and finishing.
- Distribution to clients or retail.

### Allthread Industries

#### Operations:

Manufactures threaded rod products and fasteners for the construction and infrastructure sectors.

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).

#### Supply Chains:

- Acquisition of raw materials (steel, brass, etc.).
- Precision threading and quality testing.
- Distribution to wholesalers, retailers, and construction firms.

### First Forge

#### Operations:

Specialises in forging steel components, catering to industries requiring high-strength parts. Also imports high-quality engineered fasteners.

#### Supply Chains:

- Procurement of steel billets or ingots.
- Forging, machining, and finishing processes.
- Sale of forged components to industrial clients (e.g., mining, automotive, or heavy machinery).

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.

## Affiliate



### Australian Frontline Machinery

#### Operations:

Sale of ex-Military vehicles, Government assets including vessels, machinery, and equipment via online auctions.

#### Supply Chains:

- Asset acquisition from government agencies (Australian Defence Force).
- Inspection and refurbishment.
- Online auctions.

## Non-trade Supply Chains

- 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 Group.
- 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.
- Contractors and subcontractors who deliver services to the Sell & Parker Group.

## MODERN SLAVERY RISKS

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

#### Our Approach

Sell & Parker has zero tolerance for any form of slavery like practices within its group and supply chains. We acknowledge that without a robust and thorough approach to tackling modern slavery, there is a risk that it 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 has identified areas at risk of modern slavery, trafficking and labour exploitation in its 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. Sell & Parker's approach to upholding human rights is informed by the International Labour Organisation's Labour Standards and the Global Slavery Index

#### Modern Slavery Risks in Our Workforce


We primarily employ people who live close to our operations and offices, which are located in urban areas. These areas provide access to essential services such as education, social support, and legal resources, as well as a variety of employment options. This reduces the likelihood of exploitation; however, we recognise certain risks still exist, including:

- **Forced Labour:** Even though we employ and pay our workers directly, there is still a chance that some individuals may be under the control of others who restrict their freedom or access to resources.
- **Debt Bondage:** Workers may have taken on significant debt to secure employment opportunities before joining Sell & Parker, leaving them vulnerable to exploitation.

#### Employees with English as a Second Language

English is the primary language used in our business operations, but for some of our team members, it may not be their first language.

Limited proficiency in English can create vulnerabilities that need to be managed carefully, including where workers are required to sign contracts or other documents and may not have full understanding of their terms and rights). These workers could also misunderstand our processes and controls designed to prevent modern slavery, making it harder for employees to recognise or report issues.



At Sell & Parker, we take these risks seriously and are committed to ensuring all employees, regardless of their background or language proficiency, are protected and empowered. Through clear communication, tailored training, and robust recruitment practices, we work to minimise these risks and create an environment where everyone understands their rights and feels supported.

### 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

### Contractors and Subcontractor Risk

If subcontractors and their own supply chains lack the necessary systems and controls to prevent modern slavery, there is a risk that we could unknowingly contribute to exploitative practices. This includes the potential use of forced labour or child labour in subcontractor operations or further down their supply chains.

We are committed to addressing these risks by working closely with subcontractors to ensure they adhere to the same ethical standards we set for ourselves.

### 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.

### Trade Supplier Risk

Suppliers that underpay or control the rights of employees is an identified risk of Sell & Parker contributing to modern slavery. 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 hold labour-based roles and are not required to have undergone tertiary education and training on modern slavery. These individuals may be vulnerable to exploitation 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.

#### Non-trade Supplier Risk

##### **Protective Gear and Uniforms**

We equip our employees with the necessary protective gear to maintain their safety during operations. However, some of these items, such as those made from cotton or leather, may be tied to forced labor in their supply chains.

##### **Cleaning and Security Roles**

Cleaning and security tasks are often performed after business hours and involve limited interaction with Sell & Parker personnel. These low-skill roles are more susceptible to exploitation, including forced labor or debt bondage.

##### **Electronics and IT Equipment**

Electronics and IT equipment often rely on precious/semi-precious materials, which may be sourced from regions where labor exploitation and unsafe mining practices are prevalent.

##### **The Construction Sector**

Construction projects require a mix of skilled tradespeople and unskilled workers. The latter, with minimal training requirements and low barriers to entry, are particularly vulnerable to exploitative conditions such as forced labor or bonded labor.

##### **Third-Party Agents**

While agents themselves may not directly engage in modern slavery, unethical behavior on their part, such as bribery or collusion, can foster conditions where modern slavery becomes possible.

## **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 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; 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.



**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.



**Code of Conduct and Core Values** 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.

**Service** Drives us to meet the highest ethical standards by prioritising responsible sourcing and ethical business practices. We work closely with our suppliers to ensure their operations align with our values, conducting reviews and fostering a culture of accountability to eliminate modern slavery risks.

**Fairness** Reinforces our belief that all individuals deserve equal treatment, fair wages, and safe working conditions. We monitor our supply chains to identify any exploitation and engage with suppliers to implement corrective actions where necessary.

**Honesty** Builds trust through transparency in our operations and supply chains. We openly communicate our efforts to address modern slavery and share progress in our annual Modern Slavery Statement to hold ourselves and our partners accountable.

<b>Reliability</b>	Demonstrates our ongoing commitment to identifying, addressing, and mitigating modern slavery risks. By implementing robust policies, supplier agreements, and risk assessments, we ensure responsible practices are upheld throughout our group and supply chains.
<b>Family</b>	Reminds us to care for the well-being of everyone connected to our operations, from employees to contractors and supply chain workers. We foster safe and supportive environments, work to eliminate forced or exploitative labour, and champion dignity and respect for all individuals.
<b>Resourcefulness</b>	Encourages us to innovate and continually improve our processes to mitigate modern slavery. By leveraging tools such as training programs, and risk assessments, we proactively identify challenges and implement sustainable solutions to strengthen human rights protections.

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

Training also 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.

## **ASSESSING EFFECTIVENESS**


### ***Describe how the reporting entity assesses the effectiveness of its actions***

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

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.

Collected data is utilised by internal review processes to assess the effectiveness of existing modern slavery risk mitigation measures. 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.





Training is tracked to ensure that it 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.

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 its subsidiaries, operating under a unified central governance framework. The managers of each business, alongside those overseeing supporting functions across the group, form part of our management team. Both the management team and the Board of Directors are regularly updated on and actively engaged in our modern slavery initiatives.

Notwithstanding the common governance structure, where the same individuals represent each entity within the corporate group on their respective boards, Sell & Parker has actively consulted with its subsidiaries through their management teams. These consultations focus on the policies being implemented to mitigate modern slavery risks and their anticipated effectiveness.

## **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 formalising a standalone modern slavery policy;
- updating our 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 build on our stakeholder engagement on this issue, including delivering appropriate awareness training sessions on modern slavery principles to new Sell & Parker staff.



## Community Engagement

At Sell & Parker, our commitment to giving back to the community plays a key role in addressing modern slavery risks by fostering ethical and sustainable practices.

By supporting organisations like the Royal Flying Doctors Service (**RFDS**), St Vincent's Clinic, Better Foundation, and The Westmead Institute, we contribute to improving healthcare and outcomes for vulnerable populations. Stronger communities with access to essential services are less susceptible to exploitation and modern slavery risks.

Our involvement in initiatives like Sculpture by the Sea and the Woolloomooloo & Inner City Police Community Scholarship Foundations highlights our focus on promoting education, culture, and community connection. By supporting education and empowerment, we help reduce vulnerabilities that could lead to forced labor or other forms of exploitation.

Additionally, our work on the Reconciliation Action Plan strengthens our relationships with First Nations communities, reinforcing our commitment to inclusivity and equity. By addressing systemic inequalities and fostering meaningful connections, we contribute to reducing risks of exploitation within these communities.

Through these initiatives, we are not only giving back but also building stronger, more resilient communities, aligning with our broader goal of creating a better, more ethical future for everyone. This approach helps mitigate modern slavery risks across our operations and the communities we impact.



