

MODERN SLAVERY STATEMENT

INTRODUCTION

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 first annual statement is due on 31 December 2020.

We are committed to operating our business lawfully and ethically and in only working with suppliers that are aligned to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity. We have a policy to protect whistle-blower's and an independent hotline for staff and suppliers to use.

We have a relatively simple supply chain that includes 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 various policies in place that support our day-to-day operations to ensure all staff and suppliers meet Sell & Parker's core values.

In preparing for our first annual modern slavery statement, a senior internal director will take ownership and responsibility for compliance with the Act.

OUR BUSINESS

Sell & Parker have been in business since 1966 and are one of the Australia's leading and largest scrap metal businesses and are buyers, processors, recycler's 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 about 350 employees with operations across New South Wales, in Western Australia, and the Northern Territory. With its growth over the years built on its strong and enduring relationships with Australian suppliers and customers both locally and abroad.

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. For the purposes of this statement, our key entities, operations and associated supply chains are as follows:

AREA	MAIN OPERATIONS	SUPPLY CHAIN
      	<ul style="list-style-type: none"> ▪ Purchase of scrap metal, processing, recycling and sales ▪ Sales and marketing ▪ Finance, Property and procurement ▪ Technology and data ▪ Commercial Governance and investments ▪ Receiving and recycling Nespresso aluminium pods ▪ 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. ▪ Steel plate profiling services in NSW through oxycut and plasma cutting technology. ▪ Supply test certificates ▪ Create drawing and plate specifications as required ▪ Made to order bolts that utilise the thread rolling manufacturing process to provide bolt solutions for OEM, construction, mining, energy, and infrastructure. ▪ Specialised importer of high quality engineered fasteners ▪ Sale of ex Military (army, navy & air force) vehicles, vessels and equipment via online auctions 	<ul style="list-style-type: none"> ▪ 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 ▪ 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. ▪ Local steel manufacturers are used when sourcing materials for the manufacturing processes. ▪ With Suppliers from Europe, Korea and USA. First Forge Australia Pty Ltd is partnered with the Vesco direct from the Australian Defence Force vini Group, which is among the industry leaders in Europe for sales of premium fasteners. ▪ direct from the Australian Defence Force

OUR APPROACH

Sell & Parker have a zero tolerance for any form of slavery like practices. We recognise 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.

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 reprisals.



Code of Conduct applies to all Sell & Parkers group employee's 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.

DUE DILIGENCE PROCEDURES

Sell & Parker have also begun conducting due diligence on all suppliers 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 practices in our Group Compliance framework and assurance processes and into 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



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;



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;



Incorporating requirements into existing assurance processes; and



Preparing our first reporting cycle under the Act and if appropriate under the NSW Modern Slavery Act, 2018.

This statement was approved by the Board of Sell & Parker May 2020

Luke Parker

Morgan Parker