



Midway

Modern Slavery
Statement
2025

Modern Slavery Statement 2025

1. Introduction

Midway is committed to preventing slavery and human trafficking within all of our operations and across our supply chains.

This statement is made pursuant to Modern Slavery Act 2018 Australia and sets out the steps we have taken to identify and mitigate risks of slavery and human trafficking across our business and supply chains during the 1 July 2024 – 30 June 2025 Financial Year.

2. Midway structure, operations and supply chains

2.1 Structure

Midway is one of Australia's largest woodfibre processors and exporters with a strong and growing plantation and carbon management business.

Midway is an Australian company based in Geelong, Victoria. Its sole shareholder is RCM RollCo Pty Ltd (ACN 682 218 579), base in Melbourne, Victoria. Midway is manager for all the subsidiary companies described in Table 1 below and is either a majority shareholder or sole shareholder of those companies. Midway and subsidiary companies (referred to as Midway hereafter) employ 124 staff across Australia.

Table 1 – Midway Group Companies

Midway Limited Geelong, Victoria/Townsville Queensland	ACN 005 616 044	
Queensland Commodity Exports Pty Ltd Brisbane, Queensland	ACN 010 906 331	
South West Fibre Pty Ltd South West Victoria	ACN 127 951 991	
Midway Tasmania Pty Ltd Bell Bay, Tasmania	ACN 614 635 764	
Plantation Management Partners Pty Ltd Tiwi Islands NT	ACN 138 414 687	

2.2 Operations

Woodfibre

Midway's core business is the production and marketing of woodfibre for supply to producers of pulp recyclable paper and packaging plastics replacement products and coal replacing energy generation in the Asian region. Woodfibre sold by Midway is primarily produced from plantation hardwood, with the balance produced from plantation softwood and thinning logs from native hardwood forests.

Midway has interests in five processing and export facilities across Australia.

Forest and Land Management

Midway manages (under a range of ownership arrangement) approximately 52,000 ha of forests within Victoria, Tasmania and the Tiwi Islands.

Midway brings over 20 years' experience in softwood and hardwood plantation management and environmental management systems covering all stages from land selection, establishment, maintenance through to harvesting.

Logistics, Harvest and Haul

Midway engages contractors to harvest and haul timber to processing sites, including the company owned mills and to third party facilities. We operate in compliance with timber harvesting codes of practice in the states we operate in – Vic, SA, Qld, NT, NSW and Tasmania. Midway manages all aspects of harvesting for landowners' plantations, including permits and approvals, roading, harvesting and haulage.

Carbon

Midway provides solutions for carbon abatement and emissions offsets using natural processes and our expertise.

2.3 Supply Chains

The majority of Midway's supply chain is woodfibre. All woodfibre is sourced from within Australia through one of the following supply arrangements:

- Harvest and haulage operations that Midway owns and operates. Labour is engaged directly by Midway.
- Harvest and haulage operations where Midway engages contractors and supervises the work. Contractors engage labour.
- Third party supply of wood delivered 'Mill Door' under contract from either State owned or private entities. Suppliers or their

The supply chain includes processed woodchips and may extend to either the departure port, or to the destination port for woodchip vessels. With *Free-on-Board* (FOB) woodchip shipments, Midway loads the vessel at the departure port, and the buyer arranges freight to the destination port. For *Cost Insurance and Freight* (CIF) shipments Midway charters the vessel to the destination port.

Other products and services provided to Midway include port services, fixed plant and equipment, mobile plant, consumables, seedlings, fertilisers, agricultural chemicals, office supplies, consulting services, fuels, electricity, and protective clothing. Table 2 below lists suppliers and their location.

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Table 2 – Location of suppliers

Item	Location
Operations	
Woodfibre production – roundwood, or woodchip produced in forest, transport to processing site.	All from within Australia, as described in Logistics, harvest and haul above.
Woodfibre processing – production of woodchip from roundwood, storage and shiploading.	All within Australia.
Forest silviculture – establishment and management of forests and tree farms.	All within Australia.
Supply Chains	
Vessel Charter	Japan, Singapore
Fixed plant and equipment	Australia, USA
Consumables	Australia, USA, China
Mobile plant	Australia, USA, Japan, Asia, Americas and Europe
Seedlings	Australia
Fertilisers	Australia, China, South America and other sources
IT & Artificial Intelligence	Australia, USA, China, Canada, Germany and other sources

Risks of modern slavery practices

Table 3 below describes the risks of modern slavery practices within Midway’s operations and supply chains. Risks are assessed as low within operations conducted by Midway. These are conducted within Australia, subject to controls including external auditing, and contractual requirements.

Certain areas of our supply chain may pose a higher labour rights risk due to their location and the nature of the goods and services procured. Our risk assessment is a combination of sector and industry risks, product and services risks, geographic risks; and entity risks.

Table 3 – Risk assessment

Sector	Risk
Operations	
Woodfibre production – roundwood, or woodchip produced in forest	Midway engages with third parties for harvest and haul production services within Australia. There is a small risk that modern slavery conditions exist. As all operations are governed under Australian Law, Midway considers this risk to be low.
Woodfibre processing – production of woodchip from roundwood, storage and shiploading	Midway engages third parties in the process of shiploading such as stevedores, shipping agents and fumigation services. There is a small risk that modern slavery conditions exist. As all are governed under Australian Law, Midway considers this risk to be low.
Forest and tree farm Silviculture	Midway engages third parties for forest and treefarm silviculture services. There is a low risk that modern slavery conditions exist. As all operations are governed under Australian Law, Midway considers this risk to be low.
Supply Chains	
Vessel Charter	There is a risk that modern slavery conditions exist amongst seafarers. Midway currently only charters vessels from one major Japanese shipping company. That company has their own management support system and requires suppliers and subcontractors to confirm compliance with principles of fair and ethical business. Midway considers this risk to be low.
Fixed plant and equipment	Could potentially entail risk deep in supply chains, such as the mining of conflict minerals and the production of raw materials. Largely fabricated within Australia or US and installed using local companies and therefore the risk is considered low.
Consumables	Could potentially entail risk deep in supply chains, such as the mining of conflict minerals and the production of raw materials.
Mobile plant	Could potentially entail risk deep in supply chains, such as the mining of conflict minerals and the production of raw materials. Largely fabricated within Australia or US and installed using local companies and therefore the risk is considered low.
Seedlings	Supply chain within Australia, considered low risk.
Fertilisers	Could potentially entail risk deep in supply chains, such as the mining of conflict minerals and the production of raw materials. Some major Australian suppliers have a modern slavery policy and have lodged a modern slavery statement.
IT & Artificial Intelligence	Could potentially entail risk deep in supply chains, such as the use of people in developing countries. The supply providers are based in countries with stronger labour laws including modern slavery, so is considered low risk.

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3. Our actions to assess and address modern slavery risk

Detecting and preventing instances of Modern Slavery is implemented through a strong governance and control framework.

Key Midway policies that assist in detection of modern slavery practices include:

- Mission, Vision and Values
- Anti-Slavery policy
- Code of Conduct
- Equal Opportunity and Prevention of Workplace Discrimination, Harassment and Bullying Policy
- Sustainability Policy
- Anti-Bribery and Anti-Corruption Policy
- Whistleblower Policy
- Grievance Policy and Procedure
- Chain of Custody Policy

Midway has taken a number of actions since the 2024 Modern Slavery Statement was issued, to improve our understanding and mitigate modern slavery risks including:

- Ongoing training regarding modern slavery for all staff.
- Ongoing implementation of a training package and declaration for suppliers and contractors.
- Ongoing updating of contracts as they are renewed to include the AS4000 clause on modern slavery.

4. Effectiveness of our controls

Midway has implemented a number of initiatives to track our progress against detecting and preventing modern slavery practices including:

- System for reporting breaches via the Midway group incident reporting system.
- Whistleblower hotline.
- Employee assistance program provides an anonymous counselling service available to employees.
- Periodic reviews of the strategic risk register includes review of risk ratings, controls and effectiveness of controls in reducing risk.
- Annual external forest certification audits include assessment of compliance with International Labour Organization conventions.

5. Consultation

Reporting entities within the Midway group were consulted in relation to this statement and procedures to be adopted, which included discussions with business unit managers regarding risk assessment, and implementation of the framework.

6. Ongoing actions

We will:

- Implement supplier self-declaration regarding modern slavery
- Complete deployment of training packages and declarations for suppliers and contractors
- Continue to implement training for new employees
- Update new contracts on an ongoing basis to include AS4000 clause on modern slavery

I, Tony McKenna, hereby certify that the Modern Slavery Statement 2025 has been approved by the Board of Directors of Midway Limited on 24 November 2025.



Tony McKenna
Managing Director
Midway Limited

24 November 2025

Midway

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