



Midway Stainless Group

Enabling Sustainable Australian Industry

MIDWAY METALS | PROCHEM PIPELINE PRODUCTS

MODERN SLAVERY STATEMENT 2025



56 Business Street
Yatala QLD 4207

(07) 3382 9500

headoffice@midwaymetals.com.au

www.midwaymetals.com.au



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1. Introduction and approval

This statement has been prepared to comply with the *Modern Slavery Act 2018* (Cth) (“**Act**”) and is prepared for Midway Metals Pty Ltd (ABN 88 001 831 090) (“**Midway Metals**”) and its related bodies corporate, including its wholly owned subsidiary, Prochem Pipeline Products Pty Ltd (ABN 74 000 337 824) (“**Prochem Pipeline Products**”) (collectively, “**Midway Stainless Group**”, “**we**”, “**us**”).

The Midway Stainless Group leads by example and is committed to acting ethically, with integrity, and with transparency and seeks to do business with suppliers that align with these values.

The Midway Stainless Group understands that modern slavery may affect our operations and supply chains. This statement outlines the steps taken by the Midway Stainless Group during the financial year ending 2025 to improve our systems and processes to identify and reduce the risk of modern slavery occurring in our business activities.

On 19 December 2025, this Modern Slavery Statement was approved by the Board of Directors of Midway Metals, which is the principal governing body of the Midway Stainless Group. This statement was signed by Paul Batty in his role as the Managing Director of both Midway Metals and Prochem Pipeline Products on 19 December 2025.

2. About Midway Stainless Group

Midway Metals was founded in 1982 and is Australia’s largest independently owned stainless steel supplier. Midway Metals is a proud Australian business that supplies and processes a wide range of stainless steel products.

Prochem Pipeline Products was founded in 1957 and has become one of Australia’s leading suppliers of stainless steel products, with an emphasis on piping, fittings, valves, and instrumentation.

The Midway Stainless Group has a presence in all Australian jurisdictions except for the Northern Territory and the Australian Capital Territory.

For more information about Midway Metals and Prochem Pipeline Products, please view their respective websites:

- www.midwaymetals.com.au
- www.prochem.com.au

Midway Metals otherwise owns or controls the following entities:

- Midway Stainless Steel Pty Ltd (ABN 64 004 001 398);

- Midway Securities Pty Ltd (ABN 65 065 665 143);
- Midway International Holdings Pty Ltd (ABN 83 111 814 941);
- Midway Asia Holdings Pte Limited (UEN 200415227D); and
- Midway Metals Vietnam LLC.

The reporting requirements of the Act were discussed with each of the above entities, and they were consulted in the preparation of this Modern Slavery Statement.

3. Our supply chains

The Midway Stainless Group sources materials through an international network of carefully selected and audited suppliers throughout Australia, Europe, Asia, and North and South America.

The Midway Stainless Group expects our suppliers to conduct their operations in a socially and environmentally responsible manner. Although the Midway Stainless Groups takes steps to ensure that its employees and suppliers are not affected by modern slavery, we acknowledge the possible existence of modern slavery practices by suppliers operating in higher risk countries, including India, Malaysia, Ukraine, and the United Arab Emirates.

Midway Metals recognises that some countries may have a higher risk of modern slavery due to differing legislative requirements, conflict, and other socio-economic factors.

In the 2025 financial year, the Midway Stainless Group revised and updated its list of suppliers. The Midway Stainless Group then conducted an updated risk assessment based on the geographical location of suppliers. To conduct our risk assessment, we accessed public data from the Global Slavery Index 2025 (“GSI”) that provides an estimated proportion of people living in modern slavery for each country. Midway Metals determined that any supplier operating within a country with an estimated proportion of people living in modern slavery over 6.00 (per 1,000 people) would be considered ‘high risk’ and monitored closely.

4. Actions taken to address modern slavery risks

Midway Metals has taken action to identify, prevent, and mitigate potential adverse human rights impacts in our operations and supply chain. Such action includes:

1. identifying and assessing potential human right impacts;
2. integrating findings; and
3. publicly communicating what is being done through the submission of our annual Modern Slavery Statement.

In the second half of 2025, the purchasing teams of Midway Metals and Prochem Pipeline Products collaborated to introduce a revamped supplier approval process as part of Midway Stainless Group's commitment to continue improvement. Part of this approval process includes suppliers formally acknowledging, and agreeing to be bound by, Midway Stainless Group's uniform Modern Slavery Policy and Supplier Code of Conduct ("**Code**"). The Code outlines the Midway Stainless Group's minimum expectations for suppliers in the areas of legal compliance, quality, ethical sourcing, employment practices, health and safety, integrity, ethics and conduct, information protection, and the environment. The Code requires all suppliers to comply with Midway Metals' Modern Slavery Policy.

As part of this initiative, Midway Stainless Group has obtained formal acknowledgements and agreement from all suppliers that operate in the above 'high risk' regions to be bound by Midway Stainless Group's Modern Slavery Policy and Supplier Code of Conduct.

As a condition of doing business with the Midway Stainless Group, we expect all suppliers to operate in a manner that meets or exceeds our minimum requirements set by the Code and to be able to demonstrate that suitable measures are in place to meet our minimum requirements. Our approach is to continue to assess supplier compliance with the Code, to drive continuous improvement for the Midway Stainless Group and people and communities along our supply chain. The Midway Stainless Group considers a supplier's performance in accordance with the Code when making sourcing decisions and in managing our relationships with suppliers. If a supplier is unable to demonstrate compliance with the Code or fails to meet minimum requirements, the Midway Stainless Group reserves the right to pursue appropriate action, including remediation or termination of the business relationship with the supplier.

5. Effectiveness and our ongoing commitment to combat modern slavery

To date the Midway Stainless Group has not been made aware of any human trafficking or modern slavery activities within its business activities or supply chains, but if any concerns are highlighted, they will be acted upon immediately by senior management.

Employees and suppliers are encouraged to report any concerns about modern slavery relating to our people, business units, or supply chains.

The Midway Stainless Group remains committed to upholding the highest standards of integrity and ethics in all its operations

The Midway Stainless Group acknowledges that combatting modern slavery requires ongoing commitment. The effectiveness of these processes is assessed through the purchasing teams of Midway Metals and Prochem Pipeline Products and internal audits conducted by senior management. The Midway Stainless Group will continue to comply with its obligations under Act and produce an annual statement reporting on risks within our operations and supply chains, actions we have taken to mitigate these risks and the effectiveness of those actions.



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In the 2026 financial year the Midway Stainless Group will continue to collaborate with internal and external stakeholders to address modern slavery risks. The Midway Stainless Group will continue to obtain acknowledgements and agreement from our suppliers to be bound by the Code, as these suppliers are due to be reviewed. The Midway Stainless Group will continue to strengthen its ability to ensure modern slavery risks are identified and acted upon where they might exist within our business activities and supply chains.



Paul Batty

Managing Director of Midway Metals Pty Ltd
and Prochem Pipeline Products Pty Ltd

19 December 2025



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- Hygienic tube fittings
- Valves
- Plasma cutting up to 80mm
- Coil processing

At Midway Metals, we're leading the industry and going the extra mile for our clients. We pride ourselves on product knowledge and availability, as well as our extensive range of auxiliary and after-sale services. Contact Midway Metals for quality products, superior services and a helpful team who not only understand the industry, but are also passionate about adding value and providing support to your organisation.

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