



# Midway Metals

## MODERN SLAVERY STATEMENT 2024



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## 1. Introduction and approval

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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**"), which Midway Metals acquired in the 2024 financial year (collectively, "**Midway Group**", "**we**", "**us**").

The Midway 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 Group understands that modern slavery may affect our operations and supply chains. This statement outlines the steps taken by the Midway Group during the financial year ending 2024 to improve our systems and processes to identify and reduce the risk of modern slavery occurring in our business activities.

On 30 December 2024, this Modern Slavery Statement was approved by the Board of Directors of Midway Metals, which is the principal governing body of the Midway Group. This statement was signed by Paul Batty in his role as the Managing Director of Midway Metals Pty Ltd on 30 December 2024.

## 2. About the Midway Group

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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.

During the 2024 financial year, Midway Metals acquired Prochem Pipeline Products. Prochem Pipeline Products was founded in 1960 and has become one of Australia's leading suppliers of stainless steel products, with an emphasis on piping, fittings, valves, and instrumentation.

The Midway 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](http://www.midwaymetals.com.au)
- [www.prochem.com.au](http://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 Australia 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

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

The Midway Group expects our suppliers to conduct their operations in a socially and environmentally responsible manner. Although the Midway 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 regions, including China, India, and Vietnam.

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 2024 financial year, the Midway Group revised and updated its list of suppliers. The Midway 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 2024 (“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

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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 April 2024, Midway Metals overhauled and updated its modern slavery policy. The revised Modern Slavery Policy outlines, in comprehensive terms, what constitutes modern slavery, the indicators of modern slavery, the reasons for wanting to eliminate modern slavery, the responsibilities of the Board of Directors, employees, and suppliers, and how one may report any concerns of modern slavery.

Midway Metals also overhauled and updated its Supply Chain Management Policy and Supplier Code of Conduct and from these two documents created a single new Supplier Code of Conduct ("**Code**"). This Code outlines the Midway 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 updated).

The Code and updated Modern Slavery Policy were recently adopted by Prochem Pipeline Products, ensuring consistency between the business units comprising the Midway Group.

As a condition of doing business with the Midway 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 assess supplier compliance with this recently revised Code on an ongoing basis, to drive continuous improvement for the Midway Group and people and communities along our supply chain. The Midway 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 Group reserves the right to pursue appropriate action, including remediation or termination of the business relationship with the supplier.

## **5. Effectiveness & our ongoing commitment to combat modern slavery**

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To date the Midway 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. To this end, new reporting channels have been established, these being:

1. the newly created role of General Counsel, which responds to any concerns related to modern slavery that might arise; and
2. a new reporting email address, [concerns@midwaymetals.com.au](mailto:concerns@midwaymetals.com.au), which allows individuals the ability to report concerns anonymously.



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

The Midway Group acknowledges that combatting modern slavery requires ongoing commitment. The effectiveness of these processes is assessed through internal audits conducted by senior management. The Midway 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.

In the 2025 financial year the Midway Group will continue to collaborate with internal and external stakeholders to address modern slavery risks. The Midway Group will focus on contacting suppliers and distributing our questionnaire to gain a better understanding of how key suppliers are addressing modern slavery risk within their operations and supply chain. The Midway 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.



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**Paul Batty**  
Managing Director of Midway Metals Pty Ltd

30 December 2024



# Midway Metals

the stainless steel innovators

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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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