

Modern Slavery Statement 2021

Midway Metals Pty Ltd

1. Introduction

Midway Metals Pty Ltd (Midway Metals) was founded in 1982 and is Australia's largest independent stainless steel supplier. Midway Metals has several operations across Australia with approximately 170 employees. Midway Metals has a zero-tolerance approach to modern slavery in its operation and supply chain and is committed to acting ethically, with integrity and with transparency. Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and child labour. The Australian Federal Government's passing of the Modern Slavery Act 2018 (Cth) requires Midway Metals to report annually on the risks of modern slavery in its operations and supply chains, the actions taken to assess and address those risks, and the effectiveness of those actions.

2. Consultation

The information presented in this statement covers the actions undertaken by Midway Metals (ABN 88 001 831 090) in the 2021 financial year. During the 2021 reporting period, Midway Metals actively engaged and consulted with all companies that we own or control in the development of this statement. Midway Metals 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 Marine Pty Ltd / ABN 23 008 870 184
- Midway International Holdings Pty Ltd / ABN 83 111 814 941
- Midway Asia Holdings Pte Ltd / ABN 70 700 155 067
- Midway Metals Vietnam LLC

Midway Metals discussed with these entities details of the Modern Slavery Act 2018's reporting requirements, information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

3. Risk Assessment

Midway Metals source materials through an international network of carefully selected and audited suppliers throughout Australia, Europe and Asia. At Midway Metals we expect our suppliers to conduct their operations in a socially and environmentally responsible manner. Although Midway Metals takes steps to ensure that its direct employees and suppliers are not affected by modern slavery, Midway Metals acknowledges the possible existence of modern slavery practices by suppliers operating in higher risk regions. Midway Metals recognises that some countries may have higher risk of modern slavery due to differing legislative requirements, conflict and other socio-economic factors. In the 2021 financial year,

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Midway Metals revised and updated their list of suppliers. Midway Metals then conducted an updated risk assessment based on the geographical location of suppliers. To conduct its risk assessment Midway Metals accessed public data from the [Global Slavery Index 2018](#) (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 should be monitored closely.

3.1. Impact of COVID19

Midway Metals acknowledges the increased pressure that the COVID19 pandemic has created on global and domestic supply chains which could have a flow on impact to our suppliers. We continue to maintain strong supplier relationships and foster open communication with suppliers about these risks. Evolving supply chains are considered in our overall risk assessments of suppliers and we will work directly with suppliers should additional risks emerge with any individual suppliers.

4. Action to Address Modern Slavery Risks

Midway Metals has taken action to identify, prevent and mitigate potential adverse human rights impacts in their operations and supply chain. This includes identifying and assessing potential human right impacts, integrating findings and publicly communicating what is being done through the submission of our annual Modern Slavery Statement.

4.1. Introduction of Supplier Code of Conduct

In this reporting period, Midway Metals designed a Code of Conduct (Code) for Suppliers which outlines minimum requirements that all suppliers are expected to meet. Midway Metals' minimum requirements are informed by applicable laws, international and industry standards, business needs and our stakeholder's expectations. As a condition of doing business with Midway Metals, we expect all suppliers to operate in a manner that meets or exceeds our minimum requirements and to be able to demonstrate suitable measures are in place to meet our minimum requirements. Our approach is to assess supplier compliance with this Code on an ongoing basis, to drive continuous improvement for Midway Metals and people and communities along our supply chain. Midway Metals will consider a supplier's performance in accordance with this 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, Midway Metals reserves the right to pursue appropriate action, including remediation or termination of the business relationship with the supplier. Midway Metals will review this document regularly to ensure it continues to reflect stakeholder expectations and legislative requirements.

4.2. Company Policy and Staff Training

Midway Metals has several policies in place to protect human rights within our operations and supply chain. These documents outline clear standards of personal and corporate conduct and behaviour that is expected of everyone who works for, or with Midway Metals, including directors, employees, contractors and suppliers. These documents include our:

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Code of Conduct Policy, Discrimination and Harassment Policy, Equal Opportunity Policy, Supply Chain Management Policy, and Modern Slavery Policy. These policies have been reviewed and updated in the 2021 financial year. All staff at Midway Metals receive training in these policies and are expected to comply with these policies. Midway Metals also requires all suppliers to comply with our Modern Slavery Policy and our Supply Chain Management Policy which are all available to view on our [website](#). Midway Metals are committed to work with suppliers to ensure compliance.

To date Midway Metals has not been made aware of any human trafficking or modern slavery activities within our supply chain, 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 or supply chain.

5. Effectiveness & Ongoing Commitment

Midway Metals acknowledges that combatting modern slavery requires ongoing commitment. The effectiveness of these processes is assessed through internal audits conducted by Senior Management. Midway Metals will continue to comply with the Modern Slavery Act 2018 (*Cth*) 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 2022 financial year Midway Metals will continue to collaborate with internal and external stakeholders to address modern slavery risks. Midway Metals will focus on contacting suppliers and strengthening our ability to ensure modern slavery risks are notified and acted upon within our operations and supply chain.

This modern slavery statement is approved and endorsed by the Board of Directors.



Paul Batty
Managing Director
Midway Metals Pty Ltd

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