



MIDLAND METALS OVERSEAS PTE LTD

A.B.N. 57 053 006 330 A.R.B.N. 053 006 330 Business Registration No. 199103155H

MODERN SLAVERY ACT STATEMENT FY2023

This Statement is approved by Director Jacques Alexander de Vries in his role as principal governing body of Midland Metals Overseas Pte Ltd on 21 March 2024.

Introduction

The Prevention of Human Trafficking Act, passed by Singapore Parliament in November 2014, came into effect on 1 March 2015. The law serves to deter human trafficking involving sexual exploitation, forced labour or organ removal, and supports the rehabilitation of trafficked victims.

Being a responsible business since 1981 and committed to acting with integrity for both clients and suppliers, Midland Metals Overseas Pte Ltd is publishing a statement for the calendar year of 2023 in accordance with the Prevention of Human Trafficking Act. Our principle is for the company and its employees to comply with the laws and regulations of all countries in which we operate. This requirement applies to our suppliers.

Our Business

Midland Metals Overseas Pte Ltd is a private limited company incorporated in Singapore on 29 June 1991. The registered office and principal place of business is located at 1 Kim Seng Promenade, #12-04/05 Great World City East, Singapore 237994.

The holding company is Midland Enterprises Group Ltd, a company incorporated in Bermuda.

Midland Metals' operations include the supply and distribution of power cables and conductors for large scale industrial and commercial development projects, and to electricity utilities and commissions.

Our Supply Chains

Midland Metals' supply chains include manufacturers of power cables and conductors in countries such as China, Europe, the Middle East, South Korea and their related material suppliers, shipping companies, transport companies, inspection and survey companies, customs brokers, professional services from lawyers, accountants and other advisers, and office facilities services.



Risks Of Modern Slavery Practices

Midland Metals have not identified any current risks that its operations have caused or contributed to modern slavery practices or that its operations, products or services are indirectly linked to modern slavery practices through the activities of other entities with which we have a business relationship.

We have performed a risk assessment and identified general risk areas that include :

- Procurement of power cables and conductors which are manufactured in factories. Materials from suppliers may be sourced from countries that may be using forced labour. Products may be manufactured by low skilled and low paid workforce.
- Transport of power cables and conductors from factories to shipping ports at countries of origin. Short delivery timeframes may be met by using exploited labour.
- Geographic locations of manufacturers.

Our Approach

We have zero tolerance towards slavery and human trafficking. We strive to ensure that we abide by the laws and regulations applicable to the company in the countries which we operate. All our suppliers are required to follow the same commitment.

Our on-going risk assessment and due diligence of our suppliers has enabled us to understand ethical and modern slavery risks. We continue to work closely with both our internal and external audit experts, to help ensure that we are able to identify, assess and remediate modern slavery risks within our business and supply chains.

Due Diligence Processes

As part of our commitment to identify and mitigate the risk of modern slavery and human trafficking within our business and in our supply chains, we perform :-

- Internal audits by employees on company practices.
- Internal audits by employees on supply chains.
- External audits by third parties on supply chains.

We are confident that there is no modern slavery or human trafficking taking place within our company or any of our suppliers. In any instances where we felt there is a risk from our supply chains, we would contact our suppliers in writing to mitigate. We continue to monitor the risk profiles of all our suppliers, usually on an annual basis.



We have implemented systems to :-

- Identify and assess potential risk areas in our supply chains – no new supplier would be appointed without going through our risk assessment.
- Mitigate the risk of modern slavery and human trafficking occurring in our supply chains through close cooperation with our suppliers.
- Monitor potential risk areas in our supply chains.

Our Policy

We are in the process of enhancing our policies in relation to modern slavery and human trafficking. We encourage all employees and suppliers to report any concerns, without fear of any detrimental treatment. We prohibit retaliation against any individual or supplier who has reported any misdemeanor in good faith.

Training

To ensure an understanding of the risks of modern slavery and human trafficking in our business and in our supply chains, we provide training to our employees and encourage our suppliers to do the same. We develop training for our employees on the risks and impacts of modern slavery.

Moving Forward

Midland Metals is committed to comply with modern slavery laws and regulations, and continues to encourage both our employees and suppliers to prevent, mitigate or remedy modern slavery in our operations and supply chains if there is any risk of modern slavery occurring.

Consultation

Midland Metals do not own or control any other entities and therefore this criteria is not applicable.

Jacques Alexander de Vries
Director
Midland Metals Overseas Pte Ltd
21 March 2024

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Director
Midland Enterprises Group Ltd
21 March 2024