

Modern Slavery Statement 2020 **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 160 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. The information presented in this statement covers the actions undertaken by Midway Metals in the 2020 financial year.

2. 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.

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 policies include our: Code of Conduct Policy, Discrimination and Harassment Policy, Equal Opportunity Policy, Supply Chain Management Policy, and now also the newly introduced Modern Slavery Policy. 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.

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

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slavery due to differing legislative requirements, conflict and other socio-economic factors. With suppliers operating in different countries across the world, Midway Metals decided to conduct an in-depth risk assessment based on the geographical location of suppliers. A list of all Midway Metals' suppliers and their locations was made. To conduct its risk assessment Midway Metals then 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 higher risk. The findings of Midway Metals risk assessment highlighted the following countries as higher risk: India, Ukraine, Malaysia and Thailand.

Midway Metals designed a questionnaire to gain a better understanding of how key suppliers are addressing modern slavery risk within their operations and supply chain. The questionnaire asked suppliers to conduct a self-assessment on issues surrounding modern slavery and practices they use to mitigate risk within their own supply chains and operations. The questionnaire was distributed via email to high risk suppliers. 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.

3. 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 2021 financial year Midway Metals will continue to collaborate with internal and external stakeholders to address modern slavery risks. Midway Metals will focus on contacting lower risk suppliers, developing a screening form 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
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