



## CP03 Corporate Social Responsibility Policy

**CORPORATE POLICY CP03.01** Corporate Social Responsibility

**NEW/ REVISED:** New

**DATE EFFECTIVE:** 01/05/2019

**APPROVAL:** General Manager

**REFERENCE AUTHORITY:** Human Resources

**CROSS REFERENCE:** N/A

This policy replaces all verbal or written policies previously enacted.

**RATIONALE** We take our corporate responsibilities (“CSR”) seriously and are committed to advancing our policies and systems across the company to ensure we address and monitor all aspects of CSR that are relevant to our business. These include good ethical behaviour, concern for employee health and safety, care for the environment and community involvement. We recognise that our social, environmental and ethical conduct has an impact on our reputation. Therefore, we commit to continual improvement in our performance, efficient use of natural resources and aspire to Zero Harm to people and the environment.

**SCOPE** This policy governs all Midway Metals’ practices and activities. This policy applies to all staff, contractors and visitors of Midway Metals.

**POLICY** Midway Metals are committed to taking positive steps towards CSR through:

- Economically viable investments
- Technically appropriate operations
- Environmentally sound practices
- Socially responsible actions

The Board takes ultimate responsibility for CSR and is committed to developing and implementing appropriate policies while adhering to a fundamental commitment to create and sustain long term value for shareholders and all stakeholders. This is achieved by:

- Implementing sound corporate governance practices
- Operating in a responsible manner towards employees through fair and equitable practices
- Minimizing environmental impacts through implementation of international standards
- Transparent reporting on operations and activities
- Developing personnel and providing resources to meet our targets
- Caring for the environment and cultural heritage
- Monitoring potential risks and applying mitigating policies
- Reducing negative impacts through community development and local programs
- Preventing and reducing health related impacts relating to the company’s activities by managing environmental risks at source.
- Implementing distinct and separate Environmental, Health and Safety, Human Resources systems
- Working and cooperating with local authorities on all Health, Safety, Environmental and Community issues

### Ethics

Midway Metals expects that all its business is conducted in compliance with the highest ethical standards of business practice. We apply these standards to all dealings with authorities, employees, customers, suppliers, contractors and other stakeholders. Our Ethical Code of Conduct Policy has been developed to ensure that the company’s business is conducted in adherence with high ethical and legal principles and sets standards of professionalism and integrity for all employees. The following is a summary of the Ethical Code of Conduct Policy (MM01):

- All directors and employees have the right and responsibility to ensure that the company’s business is conducted with high ethical and legal principles.
- Our policy is to operate within applicable laws
- Discrimination or harassment of any kind will not be tolerated



- No bribes or facilitation payments of any kind shall be given or received
- Compliance to the strict rules on confidentiality issues
- Conflicts of interest must be avoided
- We aim to be a responsible partner within our local communities, and
- Employees are encouraged and supported to report, in confidence, any suspected wrongdoings

### Employees

Midway Metals is effectively its employees, management and assets. So, the company aims to find, keep and engage the highest calibre of employees and officers and encourages their contribution and development. Midway Metals is committed to providing equality of opportunity to all existing and prospective employees without unlawful discrimination on the basis of religion, disability, gender, age, marital status, sexual orientation, race and ethnicity. We encourage diversity and opportunity, which is reinforced through the company's Ethics policy.

The workplace must be free from violent behaviour. Threatening, intimidation or aggressive behaviour, as well as bullying, subject to ridicule or other similar behaviour toward fellow employees or others in the workplace will not be tolerated.

Midway Metals believes in taking steps to protect the privacy of its employees, officers, directors, contractors, agents and other representatives. The company will not interfere in the personal lives of such individuals unless their conduct impairs their work performance or adversely affects the work environment or reputation of Midway Metals. The company limits the collection of personal information to that which is necessary for business, legal security or contractual purposes and collection of personal information is to be conducted by fair and lawful means with the knowledge and consent of the individual from whom the information is being collected.

### Health and Safety

Work Place Health and Safety is a priority at all Midway Metals sites and the company believes there is a clear relationship between safe and healthy workplaces and overall company results. All employees are expected to be engaged in maintaining safe work sites through involvement in health and safety meetings and through conducting safety inspections. They are given safety training at commencement of employment and regularly throughout their career with the company.

Regular audits are conducted at all company's Sites and assessment of the implementation of the Health and Safety Management System and the procedures that the sites have in place to ensure the requirements of the system are met. Accidents are investigated, and safety performance is tracked by the company. Safety performance is reported to the General Manager. Any significant incident is brought to the attention of the Managing Director immediately.

The main aim of the Workplace Health and Safety Policy (MM07) is to outline the company's health and safety practices.

### Environmental

Good environmental practice and the impact that our operations have on the environment are of great importance to Midway Metals. The company is committed to sound environmental management. The main aim of the company's Environmental Policy (CP01) is to comply with all applicable environmental legislation in all jurisdictions in which we operate and to adopt responsible environmental practices.

### Authorisation

**Name:** Shaun Stewart

**Position:** General Manager

**Date:** 01/05/2019