

## CP08 Modern Slavery Policy

<b>CORPORATE POLICY CP08.01</b>	Modern Slavery	<b>DATE EFFECTIVE:</b>	01/03/2021
<b>NEW/ REVISED:</b>	New		
<b>APPROVAL:</b>	General Manager Managing Director		
<b>REFERENCE AUTHORITY:</b>	Human Resources		
<b>CROSS REFERENCE:</b>	Modern Slavery Act 2018 (Cth)		

This policy replaces all verbal or written policies previously enacted.

**RATIONALE** Midway Metals Pty Ltd (Midway Metals) acknowledges that modern slavery is a growing and complex problem that requires collaborative action to combat. 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. Business plays an important role in respecting and promoting human rights and eradicating modern slavery. Midway Metals is committed to limiting the risk of modern slavery within its own business, within its supply chains and through any other business relationship.

**SCOPE** This policy applies to all stakeholders, suppliers, employees and contractors of Midway Metals.

**POLICY** 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.

At Midway Metals:

- All employment is voluntary;
- All employment conditions meet legal standards;
- All people are treated with respect and dignity;
- We strive to be an equal opportunity employer;
- We are committed to maintaining a diverse and inclusive workforce; and
- We are committed to supporting the health and wellbeing of our people and providing a safe work environment.

Midway Metals **does not condone** the following practices in its supply chains or within its operations and workforce:

- The use of coercion, threats or deception;
- Any form of discrimination or harassment;
- Child labour;
- Involuntary or forced labour;
- Human trafficking;
- Slavery;
- Debt bondage;
- Servitude;
- Forced marriage; and
- Unacceptable treatment of workers, including physical punishment or abuse.

### **Due Diligence**

Midway Metals is committed to implement and enforce effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or its supply chain. As part of our initiative to identify and mitigate risk, Midway Metals exercises due diligence and commits to responsible sourcing.

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 and Supply Chain Management Policy.

### **Modern Slavery Statement**

Under the Modern Slavery Act 2018 (Cth) annual statements will be required from certain Australian and foreign entities. The statements will be required to include information on the entity's structure, operations and supply chains; potential modern slavery risks in those operations and supply chains; actions the entity has taken to assess and address the risks identified; and how the entity assesses the effectiveness of those actions. Midway Metals will adhere to all reporting requirements under the Act and submit an annual Modern Slavery Statement.

### **Supply Chain**

At Midway Metals we expect our suppliers to conduct their operations in a socially responsible manner and to condemn the use of modern slavery. Midway Metals requires all suppliers to comply with the laws and regulations of the countries in which they operate and to comply with this policy and our Supply Chain Management Policy (available to view on our [website](#)).

Midway Metals is committed to working with our suppliers to ensure continued compliance with this policy. Suppliers who are non-compliant, or who anticipate they will not comply with this policy must immediately notify Midway Metals at [headoffice@midwaymetals.com.au](mailto:headoffice@midwaymetals.com.au) to ensure we can address any issue and implement appropriate action plans.

### **Violation**

Employees are encouraged to report any concerns about modern slavery relating to our people, business or supply chain. If you report a potential violation it will be taken very seriously and will be dealt with in a confidential manner.

Where Midway Metals is made aware of potential modern slavery practices in its own business or within its supply chain, Senior Management will immediately investigate and appropriate disciplinary or remedial action will be taken.

**Refer to the following policies:** MM01 – Ethical Code of Conduct | MM08 – Equal Opportunity of Employment | MM09 – Workplace Discrimination & Harassment | MM12 – Employee Grievance | CP02 – Supply Chain Management

## **Authorisation**

**Name:** Shaun Stewart

**Position:** General Manager

**Date:** 25/02/2021