

Diversity Policy

Midway Limited

ACN 005 616 044

(the Company)

Adopted by the Board on 21 April 2016

Diversity Policy

Midway Limited (the Company)

1. Introduction

Diversity refers to the tangible and intangible differences that exist between employees such as gender, culture, race, ethnicity, physical limitation, sexual orientation, age, language, religion and nationality. Diversity also encompasses the many ways people differ in terms of their education, life experience, job function, work experience, personality, location, marital status and carer responsibilities.

Midway Limited (**Midway** or the **Company**) understands that the wide array of perspectives resulting from such diversity promotes innovation and business success. Managing diversity makes us creative, responsive, productive and competitive and creates value for our customers and shareholders.

In this policy, **Senior Management** means the Managing Director of the Company, his or her direct reports and such other employees of the Company determined by the Board to be included within Senior Management from time to time.

2. Scope

Midway believes that diversity is a business imperative, in that it provides a foundation to enable the Company to meet its objectives and achieve sustainable business results and facilitates its employees' ability to contribute to the success of the Company.

Midway is committed to creating a work environment that is fair and flexible, promotes personal and professional growth and benefits from the capabilities of its diverse workforce.

This policy applies to all Directors, employees and contractors of the Company.

3. Policy

In valuing and managing diversity, Midway applies the following principles:

- facilitate equal employment opportunities based on relative ability, performance and potential;
- build and maintain an inclusive environment by taking action against inappropriate workplace and business behaviour (including discrimination harassment, bullying, victimisation and vilification);
- foster a diverse workforce by developing an environment of mutual respect, dignity and openness to others;
- seek to ensure that its business practices, systems and processes do not prevent people from diverse backgrounds having equality of opportunity within the Company;
- develop flexible work practices to meet the differing needs of our employees at different stages of their life in the context of business requirements;
- attract and retain a skilled and diverse workforce;
- attract and retain a Board of Directors whose composition reflects a diversity of backgrounds, knowledge, experience and abilities; and
- improve the quality of decision-making, productivity and teamwork to meet the relevant legal requirements, and the requirements of the Board and shareholders.

The way we bring these principles to life is through a combination of:

- diversity programs;
- training and development;
- employee networks;
- policies, systems and processes; and
- internal communications.

4. Achieving Diversity

To achieve a diverse workforce, the Company supports the following:

4.1 Senior Management

Senior Management, under the direction of the Managing Director, enable the business to perform by:

- promoting diversity as an important strategic asset to achieve business objectives across the organisation;
- influencing strategic direction of diversity including setting measurable diversity objectives;
- providing leadership in identifying current and emerging opportunities to advance the diversity agenda;
- removing barriers to achieving diversity goals and commitments;
- performing a governance role to achieve effective diversity management; and
- implementing diversity initiatives from time to time to ensure relevance and ownership across all business.

4.2 Recruitment, promotion and selection

When hiring and promoting candidates at all levels, the hiring manager will consider diversity in relation to expectations of the relevant role, and selection and appointment processes to ensure that there is no intended or unintended discrimination.

4.3 Remuneration

Managers will endeavour to ensure that there is no intended or unintended discrimination towards any particular diversity group or individual within a diversity group in relation to the remuneration or reward that an employee receives.

The Board, through its Remuneration and Nomination Committee, will review remuneration and incentives programs from time to time to ensure that there are no systemic biases.

4.4 Performance Management

Performance reviews and processes will be consistently applied across the workforce, taking into account diversity and the needs to certain employees to take part fully in such reviews and processes.

4.5 Flexible work arrangements

Midway will endeavour to provide flexible working arrangements for employees to enable them to balance personal and work responsibilities for the continued success of the business.

4.6 The Board

The Board has an overarching responsibility to:

- review and monitor the effectiveness of Senior Management in carrying out their role under this policy;
- review and monitor the effectiveness of this policy;
- review and approve the measurable objectives for achieving diversity set by Senior Management; and
- review objectives and progress in achieving these objectives on an annual basis.

5. Compliance Requirements

The Company is committed to meeting its obligations with respect to "Diversity" under the ASX Corporate Governance Principles and Recommendations (3rd Edition) (**ASX Recommendations**) and any other applicable regulatory requirements, including by:

- (a) establishing this policy (pursuant to ASX Recommendation 1.5(a));
- (b) establishing measurable objectives for achieving gender diversity (pursuant to ASX Recommendation 1.5(a));
- (c) the Board annually assessing the measurable objectives and the Company's progress in achieving them (pursuant to ASX Recommendation 1.5(a));
- (d) disclosing this policy or a summary of it on the Company's website and in its annual report (pursuant to ASX Recommendation 1.5(b));
- (e) disclosing the measurable objectives and progress in achieving them in its annual report (pursuant to ASX Recommendation 1.5(c)); and
- (f) disclosing the proportion of men and women employees on the Board, in senior executive positions and across the entire Company, in its annual report (pursuant to ASX Recommendation 1.5(c)).

The Company Secretary is responsible for ensuring that the Company meets its compliance and reporting obligations referred to above, where practicable to do so.

6. Other matters

6.1 Overriding principles

Nothing in this policy will be taken, interpreted or construed so as to endorse:

- (a) the principal criteria for selection and promotion of people to work within the Company being other than their overall relative prospect of adding value to the Company and enhancing the probability of achievement of the Company's objectives;
- (b) any discriminatory behaviour by or within the Company contrary to the law, or any

applicable codes of conduct or behaviour for the Company and its personnel; and

- (c) any existing person within the Company being prejudiced by this policy in their career development or otherwise, merely because their diversity attributes at any time may be more, rather than less, common with others.

6.2 Adoption of Policy and Board review

This Policy was adopted by the Board on 21 April 2016, and takes effect from that date and replaces any previous charter in this regard.

The Board will review this Policy periodically. The Company Secretary will communicate any amendments to employees as appropriate.

6.3 Amendments to this Policy

The Company may discontinue or amend any part or the whole of this policy from time to time at its absolute discretion. This Policy can only be amended with the approval of the Board.

7. Questions

For questions about the operation of this policy, please contact the Company Secretary.