

Anti-Bribery and Anti-Corruption Policy

Midway Limited

ABN 44 005 616 044

(the Company)

Adopted by the Board 16 December 2020.

Anti-Bribery and Anti-Corruption Policy

Midway Limited (the Company)

Purpose

Midway Limited (The Company) is committed to responsible corporate governance and to conducting its business in an honest and ethical manner. Compliance with Anti-Bribery and Anti-Corruption laws is considered an integral component of the Company's business. In line with this, The Company has implemented a robust framework to deter and prevent bribery and corruption for occurring within all jurisdictions in which it operates.

Scope

This policy applies to all executive and non-executive directors, officers, employees and contractors (collectively, "employees") of Midway Limited and its subsidiaries from time to time ("the Company").

General

The Company's Anti-Bribery and Anti-Corruption framework is based upon best management practice and commits the Company to:

- Implementing an Anti-Bribery and Anti-corruption Policy and Procedure.
- Identifying areas of high risk within its business.
- Undertaking a risk assessment exercise.
- Developing and implementing a training programme for Senior Management.
- Developing and implementing a training programme for all personnel operating in areas identified as being high risk.
- Incorporating a standard, Anti-Bribery and Anti-Corruption clause in all contractual documentation.

Employees of the Company must:

- Not accept any gift, reward or entertainment which goes beyond common courtesies associated with ordinary and proper course of business from any third party in connection with the employee's employment that could compromise the Company.
- Not offer any gift, reward or entertainment to any customer or supplier of the Company other than a gift, reward or entertainment that is offered for a legitimate business purpose and of an appropriate value and nature, that is not capable of compromising the Company.
- Any gift, entertainment or other personal favour or assistance given or received which has a value in excess of A\$300 (or any other amount determined and announced by the Board) must be approved by the Managing Director (or in the absence of the Managing Director, the Chairman of the Board) and entered into the gifts register maintained by the Company Secretary. Any gift not declared may be viewed as a bribe.

The rationale for this restriction is that the offer or acceptance of a gift can create an obligation or be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices by the Company.

The Company has a well-established reputation for conducting its business in an ethical and honest manner. This Policy and framework are designed to maintain the Company's reputation, and client confidence.

The Company may amend and vary this policy from time to time.

Date Effective

This policy was adopted by the Board in July 2019.