



Bulla Dairy Foods

2021

**modern slavery
statement**





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reporting entity & consultation

This Statement sets the position of, and actions taken by, Regal Cream Products Pty Ltd as trustee of the Regal Cream Products Trust trading as Bulla Dairy Foods A.B.N 11 845 336 184 (Bulla) in relation to modern slavery risks in Bulla's business and supply chains in the year ending 30 June 2021 pursuant to the requirements of the Modern Slavery Act 2018 (Cth). Bulla does not own or control any other entities and therefore the criteria to describe the process of consultation with those entities is not applicable.



statement from Bulla's CEO

For six generations and over 110 years, our family-owned and operated business has crafted award winning dairy products made from fresh milk and cream from Australian dairy farmers. Our founding family values have driven our success at Bulla, and our commitment to our people and the families we serve through our products is at the heart of everything we do.

Our enduring mission and reason for being is to ignite passion for real dairy food, to celebrate family life today and always as we continue to spread joy through supplying high quality dairy products across Australia and remain a well-loved everyday favourite for generations to come.

We are opposed to slavery in all forms, including human trafficking, slavery, servitude, forced labour, deceptive recruiting for labour or services, debt bondage, forced marriage, and the worst forms of child labour.

We care deeply for the team members in our business and the people throughout our entire extended supply chain. Our Modern Slavery Statement is an extension of our family values and highlights our commitment to treat all people with dignity and respect and to uphold human rights across our supply chain.



Allan Hood
CEO Bulla Dairy Foods



structure, operations and supply chain

Bulla is a 110-year-old family business now into its sixth generation. It's owned by three families, the Sloans, the Andersons and the Downeys.

The business began in 1910, when cheesemaker Tom Sloan set up a creamery in his backyard in Moonee Ponds, Victoria and invented a new way to thicken and sterilise cream. Tom's brother in law, Hugh Anderson, bought into the business in 1914, making it a two-way partnership, and then in 1918, Hugh's brother Jack bought an equal share with Tom and Hugh.

Over a century later, Bulla is an iconic Australian dairy company and the descendants of Tom, Hugh and Jack continue to harmoniously own the company and make and sell cream as well as ice-cream, yoghurt and other Australian dairy products. However, unlike 110 years ago, when a backyard was the headquarters of the operation, the business today relies on the following facilities:

1. An ice cream factory in Colac;
2. A cream factory in Colac;
3. An Innovation Centre in Colac;
4. A commercial ice cream factory in Mulgrave;
5. A choc top factory in Dandenong; and
6. A large headquarters and distribution centre in Derrimut.

Bulla has also expanded its operations to sell into numerous international markets and currently employs people in Hong Kong and Singapore to manage sales into those markets.

The board consists of two representatives of each family: Ian and Rob Sloan (Ian is the chairman), Justin and James Downey, Peter Anderson and Denise Fankhauser. The Company Secretary is Russell Sloan.

Bulla's core ingredient is cream from Australian farm sourced milk with over 100 Victorian families delivering fresh milk daily to Bulla.

Bulla also procures a range of packaging and other ingredients from more than 50 suppliers including goods such as Chocolate, Fruit, Nuts, Eggs, Sugar, Cones, Bottles, Tubs, Cartons and a long list of items needed for manufacturing of delicious ice creams and chilled dairy products.

More than 400 other suppliers provide a range of services and utilities needed to support Bulla's offices, operations, manufacturing sites and product distribution.

Bulla's fresh dairy and the majority of other ingredients used to craft our dairy products are sourced within Australia, however the Bulla supply chain also includes specialty items from a range of countries including New Zealand, Belgium, Denmark, Italy, Ireland, Turkey, Canada, USA, Malaysia, China, Brazil and Argentina.





modern slavery risks and actions

We have robust policies and procedures in place to ensure we can identify and mitigate against Modern Slavery risks in our own business. Our Whistleblower Policy and procedure encourages the reporting of any suspected wrongdoing which expressly includes human rights abuses, unethical conduct and failure to comply with any legal or regulatory requirement. Since the last reporting period we have again reassessed the risk of Modern Slavery in our own operations as very low.

We acknowledge that there is a potential risk of Modern Slavery within our supply chain and the actions taken to date have been designed to assess and address those risks for the purpose of working to mitigate against those risks with a clear ambition to eliminate Modern Slavery completely.

Initially we categorised each supplier as either low, medium or high risk based upon several factors including:

- (a) geographical location based upon known high risk countries; and
- (b) the type of goods and services supplied by each supplier.

Our review identified that Bulla predominantly sources goods and services from local suppliers and from other low risk countries. During this reporting period, Bulla joined Sedex as a buyer member to enhance our ability to gain visibility of our supply chain, identify risks within both our own business and our suppliers, take action to ensure we are sourcing responsibly and to minimise Modern Slavery risks.

We developed and incorporated Modern Slavery clauses into all supply agreement templates to ensure that all new and renewed contracts include Modern Slavery provisions to help ensure, at least from a contractual perspective, that our suppliers share our values and are committed to eliminating Modern Slavery from their own supply chains.

We prepared a Modern Slavery questionnaire to be completed by all existing suppliers who may be identified as 'high risk'. The questionnaire is designed to ensure we better understand the Modern Slavery risk associated with these suppliers so we can make an informed decision as to whether we renew or exit our existing supply arrangements with these suppliers and what actions to mitigate against the risk of Modern Slavery need to be addressed.

Our Procurement Policy requires that all suppliers are expected to provide goods and services in a manner consistent with any applicable labour laws and human rights obligations, including Modern Slavery.





assessment of effectiveness of actions taken

We are monitoring the effectiveness of the actions taken to identify and address modern slavery risks within our business and supply chains. The initial risk assessment gave us a good insight into the fact that Bulla has a low modern slavery risk but it also helped us to identify where the increased risks are, such as our chocolate suppliers. We have assessed these suppliers to ensure that they are actively working to reduce modern slavery in their own supply chains in a meaningful way.

The information provided via the Sedex platform is something that we continue to work on to further enhance the effectiveness of our actions. We are also working towards utilizing Sedex audits where possible to empower Bulla to work with our suppliers to reduce modern slavery risks across our supply chain.

We will continue to work towards tightening and refining our processes to continually improve our response to modern slavery.

This Statement was approved by the Board of Regal Cream Products Pty Ltd as Trustee for the Regal Cream Products Trust on 14 December 2021

Ian Sloan
Chairman
Regal Cream Products Pty Ltd
t/as Bulla Dairy Foods
ABN 11 845 336 184

James Downey
Director
Regal Cream Products Pty Ltd
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