

Modern Slavery Statement

Bulla Dairy Foods



**Sustainably
Stronger,
Together®**



Bulla acknowledges the First Nations peoples of the lands upon which we live and work. We acknowledge their rich cultures and their continuing connection to land, waters, and community. We pay our respects to their Elders past, present and emerging.

Bulla Whistleblower Hotline

Bulla Dairy Foods upholds high standards of conduct and welcomes feedback from affected parties to improve our due diligence practices within our operations and supply chains. If you have concerns about modern slavery, potential human rights issues, or unethical behaviour in our operations or supply chain, we strongly encourage you to contact us. Your input is valued, and your right to anonymity protected.

Telephone: 1300 30 45 50

Email: bulla@stoline.com.au

Web Portal: <http://bulla.stolinereport.com>

Post: Bulla Dairy Foods C/o Stoline Pty Ltd,
Locked Bag 8, Hawthorn VIC 3122

About this statement

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 2023 pursuant to the requirements of the Modern Slavery Act 2018 (Cth).

This statement covers the reporting period 1 July 2022 to 30 June 2023 (Reporting Period) and has been prepared to meet the mandatory criteria structure as outlined in the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018.

Consultation

In preparing this Statement, the Sustainability Manager for Bulla Dairy Foods actively engaged and consulted with the relevant business units which form part of the broader organisation. This was undertaken by (i) collaborating with the relevant business units, and boards to provide an overview of the Modern Slavery Act 2018's reporting requirements, (ii) providing information regarding the actions we intend to take to address these requirements including relevant updates, and (iii) seeking feedback from relevant business units and the board with respect to modern slavery matters. This report is the consolidation of the outputs from those efforts.

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CEO Statement



For six generations and 113 years, our family-owned and operated business has produced award winning dairy products made with fresh milk and cream from Australian dairy farmers. Our founding family values have driven our success and our commitment to our people and the communities in which we operate.

As an Australian family-owned dairy business, we want to create a future for dairy we can be proud of and ensure our products are sustainable for generations to come. We know we have a big role to play within the dairy community and beyond to achieve this.

Over the reporting period we finalised our 2028 sustainability strategy, Sustainably Stronger, Together, which is guided by the relevant United Nations Sustainable Development Goals (UNSDGs). A focus area within our strategy is 'Curating responsible, ethical and resilient supply chains' which will see Bulla Dairy Foods (Bulla) continue our efforts to address key issues, such as modern slavery.

We know modern slavery is present in all countries and within most industries due to several factors such as purchasing practices and globalisation. The 2023 Global Slavery Index estimates around 41,000 people to be in modern slavery in Australia. At Bulla, 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 all team members in our business and the people throughout our extended supply chain.

During the reporting year, we invested in increasing our awareness and understanding of the complexities of modern slavery risks through training. We reviewed our existing policies, plans, processes, and capabilities against the Sustainable Procurement - Guidance ISO 20400: 2017 standard to identify opportunities for improvement. We are also invested in a detailed modern slavery and ESG risk and opportunities assessment to help guide us in the formulation of our Responsible Sourcing Roadmap which will be finalised by the end of 2023.

At Bulla, we remain committed to ongoing efforts that help identify and eliminate modern slavery.

Allan Hood
CEO Bulla Dairy Foods

Our Highlights for FY23



Assessing Risk

We partnered with [Edge Impact](#)® to complete a modern slavery risk assessment to define our most salient human rights risks areas across our supply chain

[Q Section 3](#)

Modern Slavery Risk Framework

We undertook an external review of our policies and processes to define our Risk Management Framework, and embedded it within our sustainability strategy

[Q Section 3 Case Study](#)

Continuous Improvement

We established a three-year Modern Slavery Implementation Roadmap to iteratively improve on our approaches in a coordinated and staged way

[Q Section 4](#)

Governance

We established clear roles and responsibilities for modern slavery risk management

[Q Section 4.2](#)

Capability and Awareness

We implemented baseline awareness training to our Responsible Sourcing Working Group to include our Sustainability, Legal, Procurement, and Quality Teams

[Q Section 4.4 Case Study](#)

Grievance

We reinforced the importance of our internal grievance mechanisms and identified opportunities to improve them

[Q Section 4.5](#)

1

The Bulla Way



1.1 **Our Vision**

Our family craft the best of Australian Dairy to share with the world.

Our vision is to continue to spread joy through supplying our tasty Bulla dairy products across Australia and remain well-loved by Aussie families for generations to come.

We wish to be a brand synonymous with purpose – known for leadership in sustainability; and prioritising our people and the communities we work within. We know the decisions we make and who we choose to partner with determine the type of impact we have, and we know our impacts extend far beyond our immediate operations.

That's why we're committed to partnering with values aligned organisations and working together to make dairy supply chains more sustainable and ethical.

1.2 Our Values

Since pioneering thickened cream production in 1910, our family-run company has come a long way, incorporating new products, systems and flavours without ever compromising on our company's purpose.

Bulla's long held values of respect, integrity, teamwork and courage are ever relevant today and are integral to the future we want to contribute towards.

Hear and be heard

We respect, consider, listen to and value each other's ideas and perspectives.

Customers at the heart

Our customers are central to our thinking and decision making. We focus on satisfying the needs of all customers.

Leadership by all

We are leaders within our business. Leaders are visible, approachable, seize opportunities and welcome responsibility.

We are a family

We value strong relationships, cherish our traditions and celebrate our successes. Building mutual trust is fundamental to our family's success.

Achieving our goals together

We work together to achieve our goals with a spirit of cooperation. We are honest about the challenges we face, and resolve issues together.

Courage to think differently

We challenge the way things are done today to continually improve and achieve our potential.



2

About Bulla

By taking a closer look at Bulla's own operations, workforce and supply chains, we can understand how and where modern slavery risks may occur.

About Bulla

Bulla, one of Australia's oldest and largest privately held Australian dairy companies, manufactures a national and export range of ice cream, table cream, yoghurt, sour cream, cottage cheese, and imitation cream under various brands.

Since being established by Thomas Sloan in 1910 in Moonee Ponds, Melbourne, Bulla has transitioned through a continuous improvement journey over 113 years. Production methods, product lines and distribution methods have been evolved by each of the six generations of descendants of our founders, each of whom have contributed to this endearing legacy, and still continue to own and operate the business.

Today, there is scarcely a fridge in Australia that doesn't contain an iconic Bulla product, and fewer still that won't contain one of the over 100 products manufactured under private labels of licence. In recent years we have expanded internationally, exporting our products to 28 countries.

Bulla now employs more than 1000 people across four manufacturing sites; two are in the regional town of Colac, and one each in Dandenong and Mulgrave, Victoria. Our head office and distribution centre are in Derrimut, Melbourne.

With our deep legacy, and extensive reach through our supply chain comes a responsibility to ensure we are contributing to a more ethical and sustainable dairy industry.

1910

Year established

6

Generations

10000+

Experienced team members

4

Manufacturing sites

168

Bulla products

28

Export countries*

*(including New Guinea, Fiji, China, Singapore, South Korea, Malaysia, Indonesia, Thailand, The Philippines, Japan, Hong Kong)

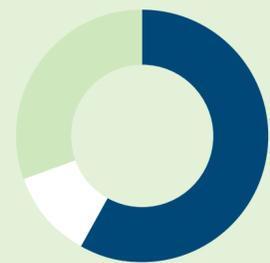
Figure 1 Bulla Operational Activities

- 1** Head Office
- 2** Chilled Dairy & Frozen Dairy Colac
- 3** Frozen Dairy Mulgrave
- 4** Frozen Dairy Dandenong



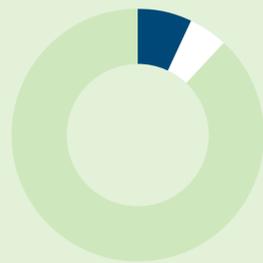
1047

Total Bulla Headcount¹



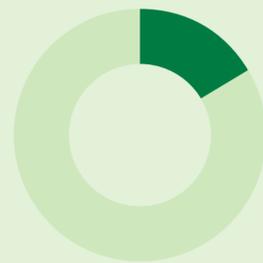
730

Full time



127

Part time



190

Casual

49

Temporary or vendor workforce operating in or as part of the business⁵

■ Permanent² ■ Fixed term³ ■ Casual⁴

2.2

Our Workforce

Bulla has a workforce of more than 1000 personnel; the majority of whom work in our four manufacturing locations in Victoria, Australia. Our operations are supported by contractors supplying services including maintenance, mechanical, engineering and professional services.

Figure 2 Key Workforce Data

¹Statistics in this table relate to the business on 30 June 2023

²Permanent employees are employed by Bulla on a full time (38 hours per week) or part time basis (less than 38 hours per week).

³Fixed term employees are employed by Bulla for a fixed term (their employment has an agreed end date).

⁴Casual employees are paid on an hourly basis.

⁵Includes temporary support services recorded in internal systems. Does not include third party asset operations and development contractors such as cleaners or security personnel.

2.3

Our Supply Chain

Bulla operates a complex global supply chain, connecting primary production, processing and distribution of raw materials to deliver high-quality dairy products to customers in 15 countries.

Our core ingredient is milk, which we source from over 250 Victorian farming families. We source packaging and ingredients globally from more than 106 suppliers directly, covering a wide range of items essential for manufacturing our ice creams and chilled dairy products. Our global supply chain spans from farms to manufacturing facilities and third-party sites, ensuring efficient product delivery worldwide. Through our operations, we make significant socio-economic contributions to the regions where we source our raw materials.

Beyond raw materials, Bulla relies on over 724 suppliers for various services and utilities crucial to support offices, operations, manufacturing sites, and product distribution. Indirect goods and services, such as cleaning and security services, are integral to our day-to-day operations.

Figure 3 Bulla FY23 Spend (By Category)

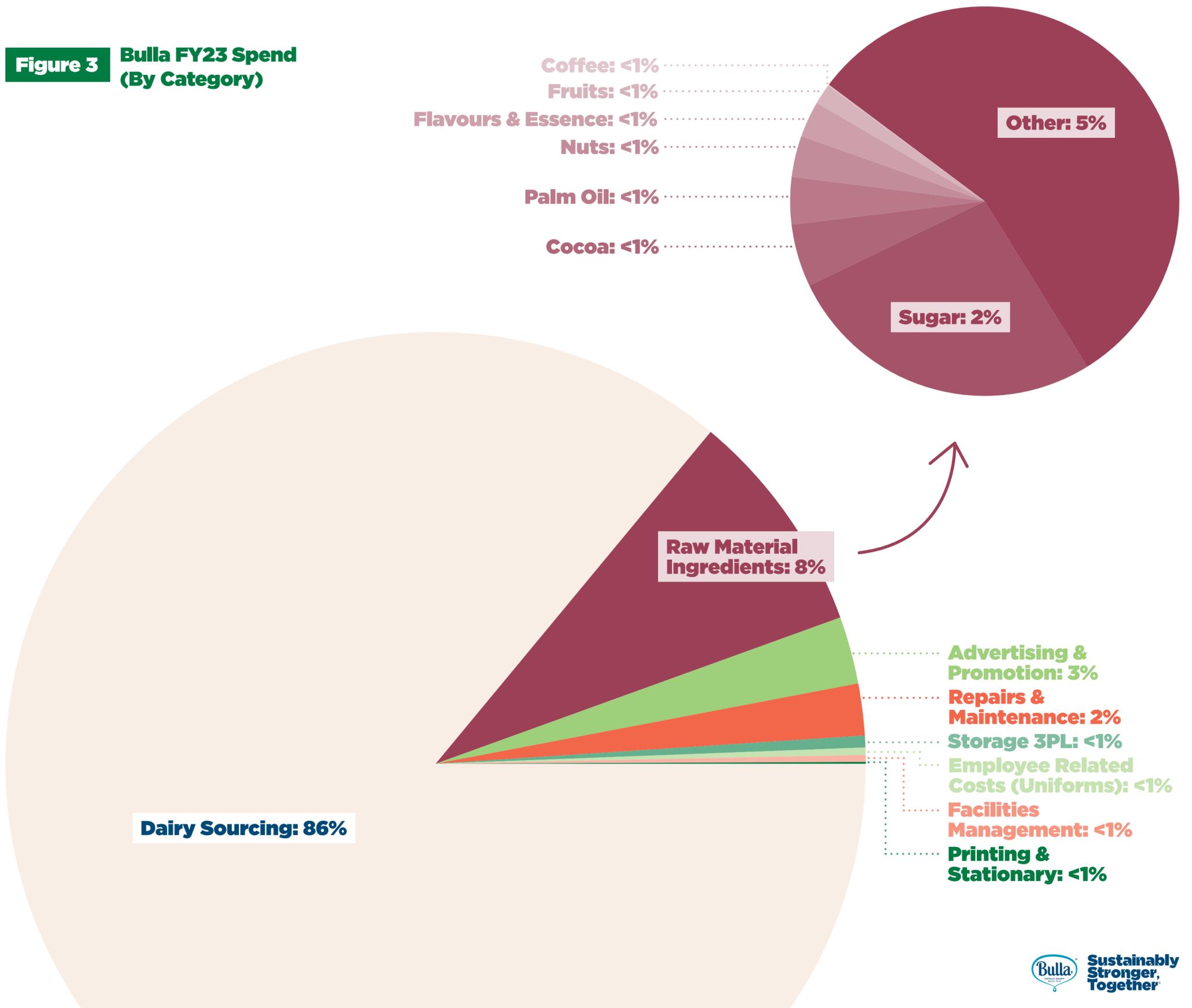


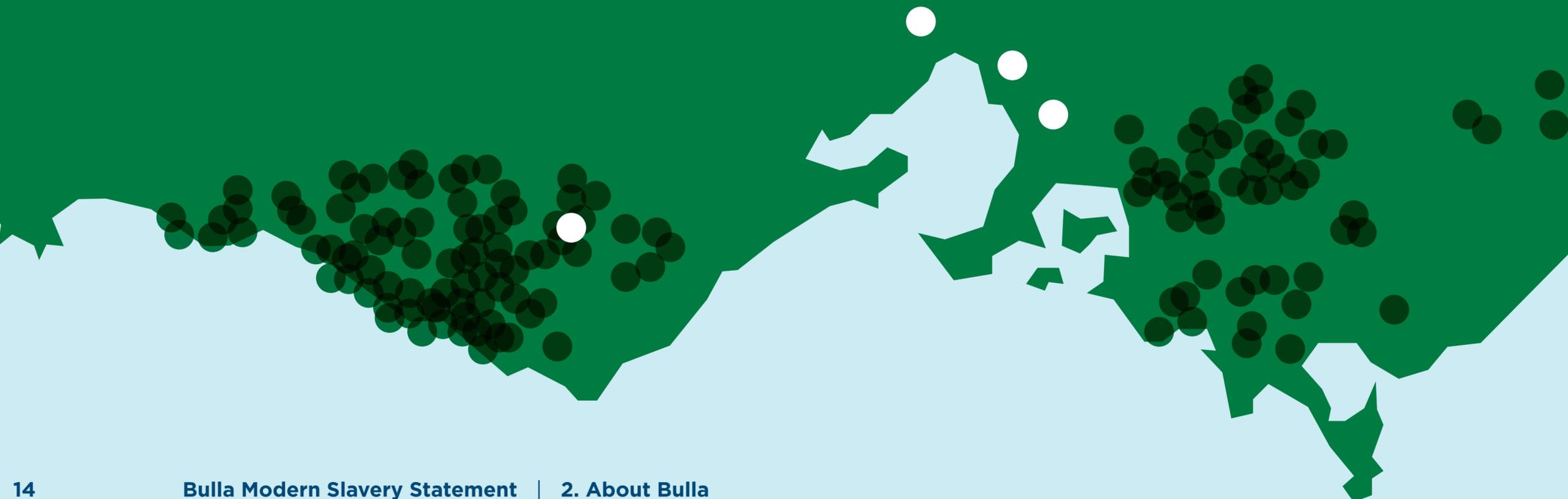
Figure 4 Dairy Sourcing Map

Dairy Sourcing

Bulla maintains a robust and direct sourcing approach for our dairy, primarily obtaining our core ingredient—milk—from a network of 250 Victorian farming families. This network spans across the Western, Northern, and Gippsland regions. Notably, these relationships with dairy farmers are longstanding and, in some cases, multi-generational.

- Dairy Farm
- Bulla Operational Facility

Victoria, Australia



Dairy Sourcing

Our direct connection with Victorian farming families is a cornerstone of Bulla's supply chain strategy and ensures a transparent and traceable supply chain.

These farms are not merely suppliers but integral partners, contributing to the reliability and quality of the raw materials essential for Bulla's diverse range of dairy products.

Our long-standing partnerships have enabled Bulla to gain a deep understanding of the intricacies of dairy production and foster collaborative and sustainable relationships.

Through our dairy sourcing, we support our local agricultural communities and uphold and communicate our commitment to responsible and ethical sourcing practices.

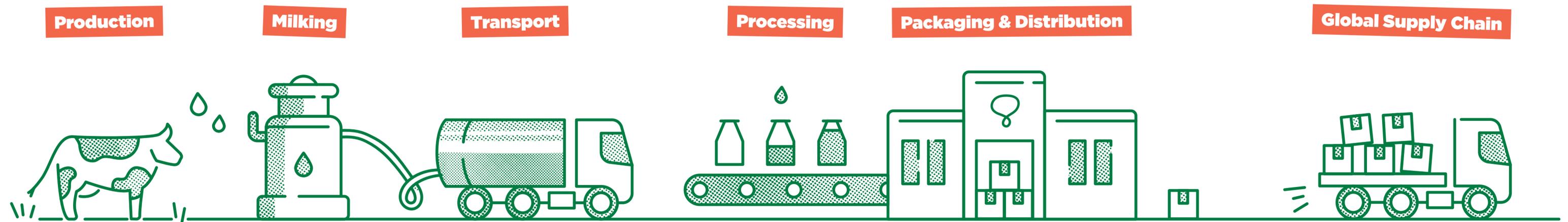


Figure 5 Overview of our Dairy Supply Chain

Raw Material Ingredients Sourcing

Bulla sources its ingredients through a supply chain that involves distributors rather than direct relationships with producers.

Bulla currently has 106 ingredients suppliers. Ingredients include sugar, cocoa, coffee, fruits, fats and oils. We recognise the inherent complexity of these supply chains and the challenge of not having direct connections with producers.



Figure 6 Overview of our Cocoa Supply Chain

Facilities management (Labour)

Labour is an essential component of facilities management. It includes grounds maintenance, security, cleaning, and laundry services to ensure the safety, hygiene, and efficiency of our dairy production facilities and offices.

Bulla has 22 facilities management suppliers. Bulla engages contractors who provide the services agreed in our statements of work who in turn employ their own staff to fulfill the terms of this contract.



Figure 7 Facilities Management (Labour)

Goods Not for Resale

Goods Not for Resale (GNFR) are essential to Bulla's day-to-day operations and business support functions, encompassing various material inputs beyond our core ingredients.

This procurement category includes items like uniforms and promotional materials.

In managing our GNFR supply chain, Bulla prioritises efficiency, cost-effectiveness, and reliability.

The structure of this supply chain is characterised by a diverse array of 66 suppliers, each contributing a specific subset of items to Bulla. Due to the broad profile of this procurement, our visibility on individual items is limited; Bulla recognises this presents a potential risk.

By working closely with reputable suppliers, Bulla aims to leverage their expertise and resources in navigating the intricacies of our GNFR supply chain, however we recognise that this is a work in progress and that reputable suppliers are not without risk.



Figure 8 Overview of our Uniforms Supply Chain

3

Understanding our Risks

In increasing our awareness and understanding of modern slavery risks we have considered the risk areas relevant to the dairy manufacturing value chain and outline the processes used to define the specific risks relevant to Bulla.

Around 41,000 people are estimated to be in modern slavery in Australia (Global Slavery Index, 2023).

Only 1 in 5 victims of modern slavery are detected in Australia.

3.1

Risks in Dairy Food Manufacturing

As a dairy manufacturer, there are inherent risks in the raw material inputs that present a potential for association with forced labour and other forms of modern slavery.

The production of many of our core ingredients relies heavily on typically lower-skilled, low-paid, and often migrant workers, exposing them to exploitation due to their limited legal rights, language barriers, and restricted access to information and support. The demand for food constituents, including fruit, sugar, cocoa, soy, or palm oil, contributes to price reduction pressures, fostering cost-cutting measures that may lead to exploitation, including forced labour.

The challenge we face is compounded by a lack of transparency in areas of our supply chain, hindering our ability to trace material origins and ensure ethical and sustainable production practices.

Offenders exploit the opacity of global supply chains, facilitating the integration of products derived from forced labour into the regular economy. For example, raw milk, being our simplest supply chain with a maximum of one intermediary (see more details in [section 2.3](#)), contrasts with products we source indirectly like nuts, sugar, cocoa, soy, or palm oil, which undergo trading and transformation through complex chains involving several intermediaries.

In the latter case, the key hurdle lies in gaining visibility into production locations to assess and mitigate the risks of human rights violations.

Figure 9 Modern Slavery has a number of complex root causes



3.2

Our Operational Risks

In FY23, the modern slavery risks in our direct operations remained comparatively low as outlined in [section 2.2](#). Seventy-eight percent of our workforce are permanent employees employed directly by Bulla on or above the appropriate award rate relevant to their role and contribute to a safe and fair working environment. Our Policy Framework, outlined in [section 4.3](#), applies to all employees. We recognise that in some contexts, non-permanent workers and workers who hold visas may be more vulnerable to exploitation and we address this via our Supply Chain Risks and Opportunity Assessment.

In 2023 Bulla conducted an analysis of our spend against internationally recognised risk databases. This included the Social Hotspot Database, Global Slavery Index as well as a comprehensive media and literature database review.

The assessment looked at potential risks in the lifecycle of our purchases across:

- **Raw material extraction**
- **Processing**
- **Manufacturing**
- **Transportation**
- **Packaging**
- **Product or service delivery**
- **Eventual use**
- **Disposal**

Through this process, we identified areas within our operations and supply chain with a high prevalence of inherent modern slavery and human rights risk, considering both geographies and industries. As defined by our Risk Management Framework, each category has been rated based on impact and likelihood of risks in the relevant industries and sectors. This is applicable both in Australia and in countries where goods and materials are likely to be sourced from with composite scores ranging from 1 to 25.

Aligned with the Australian Government's recommended approach, we adopt the principles outlined in the United Nations Guiding Principles on Business and Human Rights (UNGP) to assess our modern slavery risks. We analyse our potential involvement in modern slavery and other human rights violations through three perspectives. This enables us to thoroughly understand and address the various dimensions of our association with human rights risks, and helps us define our approach to remediation on the identification of harms.

Table 1

The United Nations' 'Guiding Principles on Business and Human Rights' (UNGPs) set out a three-part continuum of involvement that outlines how businesses can be involved in adverse human rights impacts, including modern slavery.

Cause

A business may cause modern slavery or other human rights harm where its actions directly result in modern slavery occurring.

Contribute

A business may contribute to modern slavery or other human rights harm where its actions or omissions facilitate or incentivise modern slavery.

Directly Linked

A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in businesses' extended supply chain.

Bulla's risk assessment findings

Most of Bulla's modern slavery risks exist within our extended supply chain of milk, cream, cocoa, chocolate, nuts and flavours.

Case Study

Conducting our Risk Assessment

Bulla commissioned Edge Impact to develop a formal sustainability strategy for the period 2023-2028. Our sustainability strategy sets a clear pathway for addressing the impact we have on our people, the communities in which we operate, and the natural environment on which we rely upon.

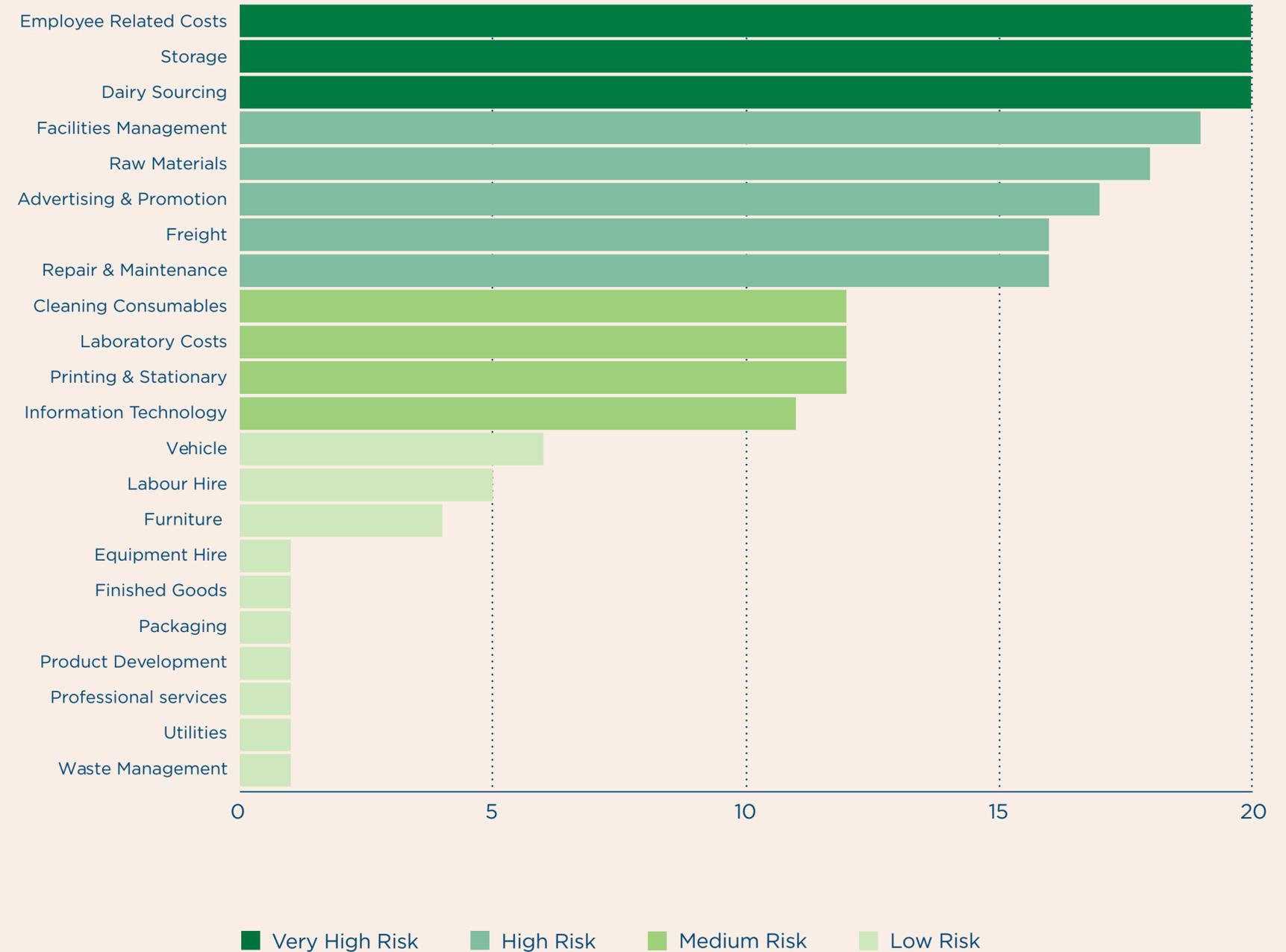
The first step in the development of this strategy was to create a formal baseline assessment of material risks, including social risks within our operations and supply chains.

This assessment not only provided our formal baseline dataset but through structured interviews and workshops allowed our team to discuss, explore and build consensus around key risks within our ability to control.

This prioritisation served both as a foundation to the strategy that followed but also an opportunity to build our teams understanding of these complex challenges.

The result of this activity is presented in [section 3.3](#).

Figure 10 Bulla Risk per Category



3.3

Our Prioritisation

Our risk assessment identified specific aspects of our supply chain where human rights implications are most evident. However, we recognise there is an opportunity to have an impact even in lower risk areas. We performed an opportunity assessment in line with the ISO 20400 methodology which provided data for internal workshops that explored our existing business practices and perceived influence to identify opportunities for meaningful interventions.

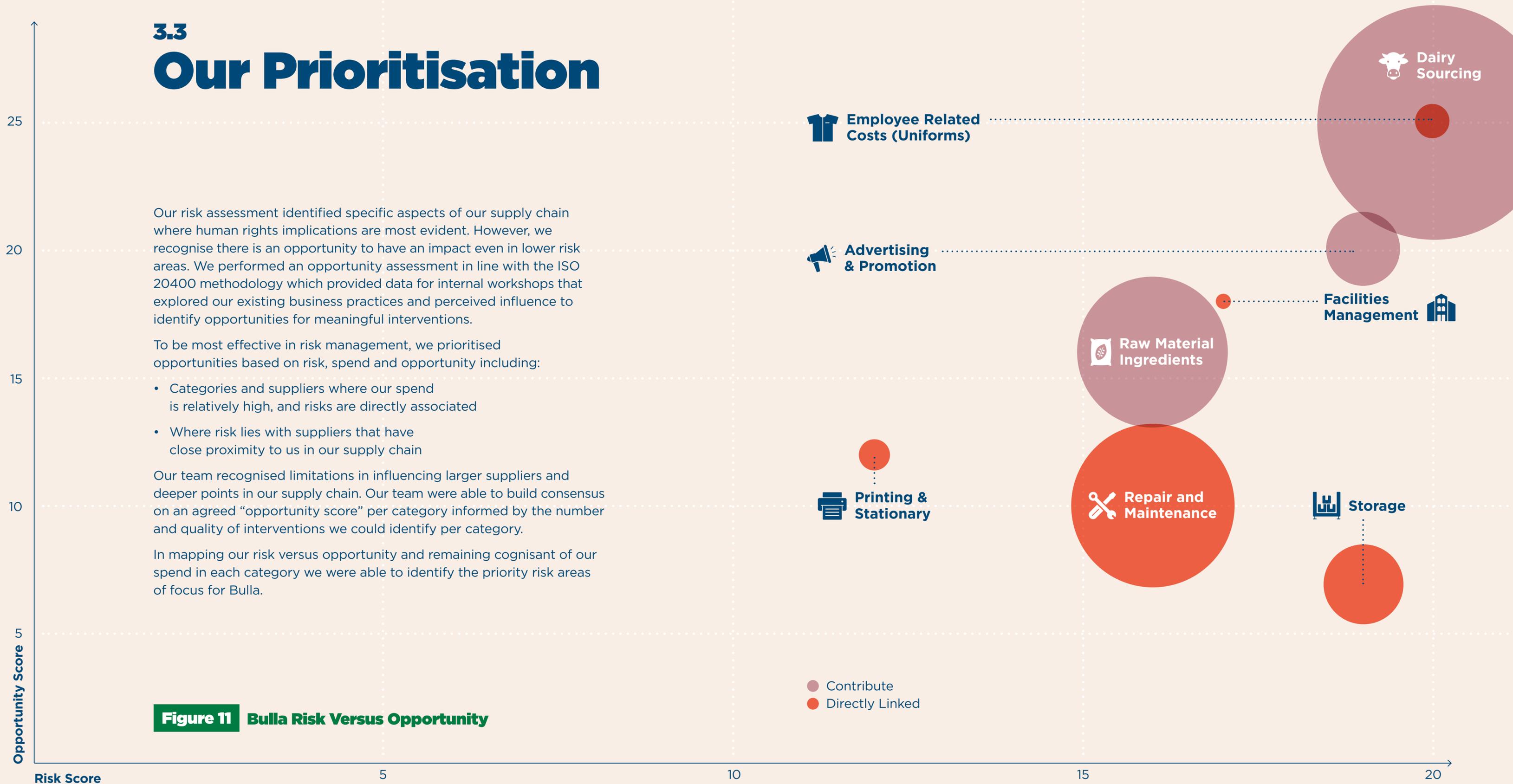
To be most effective in risk management, we prioritised opportunities based on risk, spend and opportunity including:

- Categories and suppliers where our spend is relatively high, and risks are directly associated
- Where risk lies with suppliers that have close proximity to us in our supply chain

Our team recognised limitations in influencing larger suppliers and deeper points in our supply chain. Our team were able to build consensus on an agreed “opportunity score” per category informed by the number and quality of interventions we could identify per category.

In mapping our risk versus opportunity and remaining cognisant of our spend in each category we were able to identify the priority risk areas of focus for Bulla.

Figure 11 Bulla Risk Versus Opportunity



3.4

Our Priority Risk Areas

Through our assessment and prioritisation of modern slavery risk areas across our procurement of dairy, raw material food ingredients, GNFR and facilities management labour we identified the following priority risk areas.

Table 2 Bulla Priority Risk Areas

Risk Category	Key Risk Factors	Our Relationship to Risk
Workers in our Australian dairy supply chain	<ul style="list-style-type: none"> Reliance on temporary or migrant workers Reliance on lower skilled labour Use of third-party recruitment Retention of identity documents 	<p>Directly Linked Contribute</p> <p>We recognise, if credible evidence emerges regarding excessive working hours or with-holding of identity documents in our dairy farms and we fail to take preventative measures and corrective action, we could contribute to modern slavery risks.</p>
Sourcing and processing of raw material food ingredients in our manufacturing processes (such as including sugar, cocoa, coffee, fruits, nuts, fats and oils)	<ul style="list-style-type: none"> Reliance on lower skilled labour Links to high-risk geographies Complex and fast-moving supply chains Absence of grievance mechanisms Use of third-party recruitment 	<p>Directly Linked Contribute</p> <p>Our engagement in the sourcing and processing of raw materials could contribute to modern slavery risks if we do not prioritise transparency and actively avoid suppliers from high-risk regions without appropriate oversight and controls.</p>
Use of third-party labour in the services required for our Facilities Management (including grounds maintenance, security, cleaning, and laundry services)	<ul style="list-style-type: none"> Reliance on temporary or migrant workers Reliance on lower skilled labour Use of third-party recruitment Retention of identity documents 	<p>Directly Linked Contribute</p> <p>Our contracting arrangements, typically based on estimated hours, if not reviewed and managed appropriately, may lead to additional hours being worked without sufficient payment. This, in turn, could hinder our subcontractors' ability to pay appropriate wages to their staff, ultimately contributing to the broader risk of modern slavery within our supply chain.</p>
Manufacturing of goods not for resale including our staff uniforms, advertising and promotional items	<ul style="list-style-type: none"> Reliance on temporary or migrant workers Links to high-risk geographies Complex and fast-moving supply chains Absence of grievance mechanisms Use of third-party recruitment 	<p>Directly Linked Contribute</p> <p>Sourcing of GNFR may contribute to modern slavery if our sourcing practices reduced suppliers' margins to a level where they were unable to pay their workers.</p>

4

Addressing & Mitigating our Risks

4.1

Addressing and Mitigating our Risks

Bulla is committed to creating a robust modern slavery risk management strategy. Aligned with our cultural framework and values, which emphasise leadership in sustainability and prioritises the wellbeing of people, we seek to integrate these practices into our day-to-day operations.

Committed to the UNGP's, OECD framework, and our deep understanding of Australia's dairy industry, we proactively identify and mitigate our priority modern slavery risks across our supply chain.

By embedding these measures into our business-as-usual processes, we aim to ensure a sustainable and responsible approach to business, reflecting our commitment to purposeful leadership.

Case Study

Developing our Sustainability Strategy

In early 2022, Bulla engaged Edge Impact to develop our first sustainability strategy. At the time, Edge Impact worked directly with Bulla's sole sustainability team member, herself a sixth generation Bulla family member. Over the course of the engagement, Bulla's leadership role in the Australian dairy industry became clear. However, it was also recognised that our positioning in the dairy industry had a somewhat limited view of our own influence. As a major procurer and processor in Australia, we acknowledged the need to look beyond our direct operations to consider our influence up and down our supply chain.

Through the development of our sustainability strategy we increased our scope and in turn our influence - building the team to three dedicated personnel and working to expand our areas of influence and control beyond our direct operations. This broadening follows Bulla's initial modern slavery reporting which necessitated supply chain transparency and is the precursor to this Statement. It has also driven internal awareness and management of the physical and transitional risks presenting from the impacts of a changing climate, a more strategic focus on strengthening the communities of operation and partnerships with adjacent industries and organisations to progress issues of material importance. We are in the process of formalising our procurement model to align with more sustainable outcomes, and considering how it will most effectively communicate our evolved thinking within our value chain.



4.2 Our Governance

Core to our approach is ensuring our team have a clear understanding of the role they play in our modern slavery risk management systems. All Bulla staff have a role to play with respect to modern slavery risk management, but their accountabilities vary by role. Accountability for modern slavery risk management starts with the Board.

Table 3 Modern Slavery Governance Framework

Stakeholders	Government and Regulators	Business Partners	Suppliers	Community	
Board	Bulla Board of Directors Maintain oversight of human rights (including risks related to modern slavery) across our operations and business processes				
Executive	Audit and Risk Committee Responsible for oversight of Bulla's response to human rights and provides guidance to the board		Executive Accountable for the implementation of our human rights approaches across the group		
Business Processes	Sustainability Promotes information exchange across the group on implementation of sustainability linked goals, including modern slavery	Human Resources Accountable for ensuring employees are subject to relevant awards and industrial instruments	Legal Responsible for ensuring compliance with relevant laws and regulations related to modern slavery; both domestically and internationally	Procurement Accountable for the identification and response to modern slavery risks within our supply chains	Line management Accountable for the identification and response to modern slavery risks within their departments
Operational Staff	Operational Staff Responsible for the identification of modern slavery risks within our operations and supply chains, consistent with our company values				

4.3

Our Policies

Maintaining and meaningfully implementing effective policies around issues such as modern slavery is a key part of meeting our commitment to more sustainable and ethical leadership in the dairy industry. Our key policies are summarised below.

Table 4 Policy Framework

Policy	Relevance to Modern Slavery	Policy	Relevance to Modern Slavery
Risk Management Policy	Provides a systematic approach to identifying and addressing potential risks, including compliance and third-party reputational risks, related to exploitation within Bulla's operations and supply chain.	Flexible Work Arrangements, Leave Policy, Parental Leave Policy	Promotes fair and equitable treatment, supporting work-life balance, and fosters a positive work environment.
Code of Conduct	Defines how Bulla does business and outlines the standards of behaviour expected from our team members and leaders.	Anti-Bribery and Corruption Policy	Establishes a framework to prevent corruption and bribery in Bulla's operations, contributing to the mitigation of risks by discouraging unethical practices.
People and Culture Policy	Articulates the requirements for ensuring team members are legally permitted to work in our business, including compliance with relevant visa conditions.	Procurement Procedure	Provides specific guidance in how Bulla source materials responsibly, reducing the likelihood of incorporating products produced through modern slavery in the supply chain.
Working Rights Policy	Defines and safeguards the rights of Bulla's employees, contributing to the prevention of modern slavery by ensuring fair and lawful treatment.	Responsible Sourcing Policy	Sets the overarching principles for ethical sourcing, aiming to reduce the likelihood of incorporating products produced through modern slavery in Bulla's supply chain.
Workplace Diversity, Harassment and Bullying Policy	Promotes an inclusive workplace culture, reducing the risk of modern slavery by fostering an environment that values all employees equally.	SEDEX Procedures	Bulla utilises the SEDEX platform and its supplier assessment questionnaire to evaluate and monitor our suppliers.
Health Safety and Wellbeing Policy	Promotes a safe and healthy workplace, fostering an environment where employees are protected from exploitation.	Whistleblower Policy	Facilitates the reporting of potential modern slavery incidents, encouraging employees to disclose information without fear of retaliation.

4.4

Building our Capability and Awareness

Case Study

Baseline awareness training

Bulla acknowledges that effective risk management requires well-trained personnel. In FY23, Bulla initiated training which focused on key operational teams, with ten senior staff attending a 90-minute webinar by Edge Impact. This interactive session aimed to equip our teams with the knowledge and skills to address modern slavery risks in their respective roles.

In the upcoming year, Bulla plans to expand baseline awareness training to a wider staff audience. This includes Directors, as outlined in Section 6. Bulla is committed to developing role-specific training for staff in key operational roles.

Through these targeted training efforts, Bulla aims to foster a comprehensive understanding of modern slavery risks across the workforce. This initiative reflects our dedication to continuous improvement in risk mitigation, aligning with our broader commitment to corporate responsibility and ethical conduct.

By raising awareness and building knowledge, we can empower our team to identify and respond to instances of modern slavery. We are developing our Modern Slavery Training Framework to improve modern slavery risk management.

As we mature in this area, we will extend the profile of staff receiving training and the depth of training required for different roles across our governance framework to continually improve how we assess and mitigate risks.

Table 5 Bulla Modern Slavery Training Framework

Forum	Overview
Baseline Awareness Training	Senior leaders undertake baseline awareness training in modern slavery - what it is, it's relevance to modern business practices, risks related to our operations and supply chains and the approach Bulla takes to mitigate these risks.



4.5

Our Grievance and Remediation Approach

At Bulla, we prioritise transparency, accountability, and continuous improvement in our commitment to combat modern slavery. We encourage the use of our corporate whistleblower systems to report grievances related to potential instances of modern slavery, recognising its crucial role in uncovering such cases.

While our formal remediation procedure is still evolving, we are dedicated to addressing grievances promptly and effectively. In the absence of a standalone policy, Bulla has designed a Crisis Management Framework aligned with the principles of the OECD framework, emphasising the prioritisation of vulnerable individuals suspected of being victims of modern slavery.

Key Elements of Bulla's Grievance and Remediation Approach:

Corporate Whistleblower Systems

We encourage the use of our corporate (internal) whistleblower systems to report grievances related to modern slavery, ensuring a confidential and efficient reporting mechanism.

Crisis Management Framework

Any identified suspected case of modern slavery would be treated within a Crisis Management Framework to respond to identified cases of modern slavery swiftly. This would involve escalation to executive management and the creation of a crisis response team. This would involve both internal and external stakeholders to help inform our response – including but not limited to the Australian Federal Police and the creation of a tailored management plan.

Victim-Centric

In managing grievances and remediation, we adopt a victim-centric approach, prioritising the well-being and support of individuals affected. We acknowledge that our approaches to investigating the suspected harm may need to be tactful to ensure we do not expose the suspected victim to further harm or retaliatory action from the suspected offender.

Commitment to Transparency and Continuous Improvement

We are committed to maintaining transparency throughout the grievance and remediation process. We acknowledge we have not needed to respond to an identified genuine incident yet, and that this journey will require us to remain responsive to our learning over time. We are committed to refining our approach based on evolving best practice, industry standards and feedback from our own experience.

4.6 Collaboration

To effectively address and mitigate modern slavery risks, we partner with a number of leading organisations. Collectively these efforts increase our capability and enable Bulla to contribute to the development of more ethical dairy practices.

Table 6 Bulla Partnerships Regarding Modern Slavery

Organisation	Our engagement	Organisation	Our engagement
Dairy Industry Human Rights Working Group	Bulla actively participates in the Dairy Industry Human Rights Working Group, contributing insights and gaining a deeper understanding of human rights challenges within the dairy sector. This engagement with our industry peers informs our approach to modern slavery risk management, fostering collaboration to advance ethical practices across the industry.	RSPO	Bulla engages with RSPO to ensure alignment of our approach with industry standards and advancements in responsible palm oil production. Bulla has been RSPO supply chain certified since 2014.
Dairy Australia Sustainability Framework	This framework serves as a valuable reference in shaping our modern slavery risk management approach, ensuring it resonates with broader sustainability initiatives in the Australian dairy sector.	Rainforest Alliance	Bulla’s engagement with the Rainforest Alliance informs our modern slavery risk management by incorporating best practices in environmental and social responsibility into our supply chain processes. Bulla has been Rainforest Alliance supply chain certified since 2022.
Dairy Manufacturers Sustainability Council	Bulla collaborates with the Dairy Manufacturers Sustainability Council to exchange best practices and align efforts towards sustainable and ethical manufacturing. This engagement informs our modern slavery risk management strategy, contributing to collective advancements within the dairy manufacturing industry.	Edge Impact®	Edge Impact provided (and will continue to provide) trusted professional advice to Bulla on our sustainability strategy, performed our modern slavery risk assessment, reviewed our due diligence tools and systems, hosted training events and workshops for our staff and assisted in the drafting of this year’s Modern Slavery Statement.
SEDEX	Bulla is an active user of the SEDEX platform, leveraging the platform to enhance transparency in our supply chain. This engagement allows us to share and access ethical data, contributing to the continuous improvement of our modern slavery risk management processes. Key staff have attended several webinars delivered by SEDEX to learn innovative approaches and maintain a current understanding of emerging risks relevant to Australia.		

5

Measuring effectiveness

5.1

Measuring Effectiveness

Bulla is committed to defining metrics that help us understand effectiveness of our existing frameworks. We also actively track the progress of commitments aimed at enhancing our systems, ensuring continued alignment with our strategic roadmap.

Table 7 Update on Last Year's Commitments

Area	Commitment	Progress	Area	Commitment	Progress
Assessing Risk	Engage an external consultant to perform an independent risk assessment.	We completed a risk assessment to define our priority human rights risks areas across our supply chain process (section 3.3) and outputs (section 3.4) included above.	Capability and Awareness	Prioritise awareness training for key staff who have a functional responsibility for elements of modern slavery risk management at Bulla.	We delivered baseline awareness training to eight key staff members that have functional responsibility for elements of modern slavery risk management at Bulla. This training was attended by staff from across our legal, sus-tainability, and procurement teams. Details of this training are included in section 4.4 above.
Governance	Establish clear roles and responsibilities for modern slavery risk management.	We defined a clear governance chart (section 4.2) and have started our journey in updating our processes and training to support our team in embedding these responsibilities into their business-as-usual approaches.	Grievance and Remediation	Define an approach to grievance and remediation that leverages our existing systems.	We have raised the awareness of the unique vulnerabilities of persons accessing our whistleblower systems with claims regarding serious exploitation within our supply chain.
Modern Slavery Risk Framework	Review our Risk Management Framework and identify opportunities to improve on our approaches.	We assessed the gaps and opportunities of our procedural framework; this assessment identified areas for us to improve upon and we have defined a three-year roadmap to incrementally improve on our approaches.	Continuous improvement	Create a framework to improve our systems in a coordinated way as our teams understanding of modern slavery matures.	We have established a three-year Modern Slavery Implementation Roadmap to iteratively improve on our approaches in a coordinated staged way.

6

Next steps

6.1

Our Future Commitments

At Bulla, we know there is still a long road ahead to reduce the potential modern slavery risks within the dairy industry and our supply chain. We have identified a broad range of activities that will contribute towards our future Modern Slavery Roadmap.

Table 8 Our Future Roadmap

Area	Our Future Actions
Cross-functional leadership	Create a Responsible Sourcing Working Group
Cross-functional monitoring	Create a Working Group Dashboard to monitor system health and identify areas requiring interventions relating to modern slavery risk management Identify up to 5 key modern slavery procurement-related metrics
Baseline awareness training	Extend Baseline Awareness Training to the Board and Executive Select an online module for staff training Define roles requiring mandated baseline awareness training Provide role-specific training to contract managers
Supplier management and due diligence	Incorporate an anti-modern slavery commitment into our Responsible Sourcing Policy Develop a Supplier Code of Conduct Review the SEDEX Supplier Approval Questionnaire (SAQ) and evaluation guide, explore need for a standalone SAQ for non-SEDEX suppliers Document the due diligence process, within our Procurement Procedure, detailing requirements for the defined priority risk areas Incorporate mandatory contractual clauses and associated KPIs- Include provisions for audits and data sharing with high-risk suppliers, include requirement for prioritised suppliers to have a functional grievance system in place Review and align New Supplier Ingredient checklists with due diligence process
Whistleblower response and grievance mechanisms	Review accessibility of the Whistleblower hotline with vulnerable people deep in your supply chain Promote grievance mechanisms within contractual terms and conditions Establish protocols, procedures, and a remediation strategy for addressing serious grievances

Contact Us

Head Office:

15 Swann Drive,
Derrimut, VIC, 3026

Postal Address:

P.O. Box 318,
Sunshine MDC, VIC 3020

General Enquiries:

03 9931 7888
service@bulla.com.au

This Statement was approved by the Board of Regal Cream Products Pty Ltd as Trustee for the Regal Cream Products Trust on 20 December 2023.



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 t/as Bulla Dairy Foods
ABN 11 845 336 184



**Sustainably
Stronger,
Together**