



Modern Slavery Statement 2023 - 2024



INTRODUCTION

Real Dairy Australia (RDA) is committed to implementing policies and procedures that meet its moral and ethical obligation to end Modern Slavery. Slavery, servitude, forced and compulsory labour and human trafficking represent grave human rights abuses.

RDA is an Australian privately owned cheese processing and packaging business with locations and facilities in New South Wales and Victoria. RDA is a world class supplier of dairy based products, services and solutions to the retail, foodservice and food ingredients markets and has contractual arrangements with a number of suppliers of materials and product both in Australia, New Zealand and the USA. Our company prides itself on ensuring all products are produced with utmost quality while maintaining the highest standards. As a dynamic business, we thrive on continuous improvement of our production methods and look to ensure our operations are at the forefront of innovation within the industry.



RDA recognises the inherent dignity of our staff and the people working in our supply chains and each person's equal and inalienable rights to freedom, justice and fair work conditions. RDA does not tolerate any form of Modern Slavery in any part of our business or supply chain. RDA acts ethically and with integrity in all our business relationships and ensures that its procurement practices are transparent, fair and responsible. RDA requires each supplier to adhere to its supplier requirements, agreements and policies.

Under our range of company policies and procedures RDA is committed to building and fostering a culture in which diversity is valued and to providing a workplace that is safe and respectful. This means that RDA will treat employees, customers and suppliers and other people with trust, dignity, respect, fairness and equity.

RDA is committed to developing and improving codes of practice, procedures, requirements, risk assessment and monitoring frameworks that address issues of Modern Slavery. We will continue to evolve our supply chain assurance framework to ensure our suppliers comply with our requirements.

Real Dairy Australia ABN: 19 611 077 626

This is our first statement pursuant to the Modern Slavery Act 2018 and was approved by the board.

Name: *S. Piro Micallef*

Signed: 

Date: *16/8/24*



BACKGROUND

Real Dairy Australia (RDA) is 100% Australian Owned and operated cheese processing and packaging company employing over 350 staff in NSW and Victoria and one of the largest independently owned cheese processors in the country.

We have been producing our own specialty cheese products from our dairy facility in Wauchope NSW, where all our milk is supplied by the local Hasting Valley farmers co-op. These specialty cheeses can be found within the Retail and in Foodservice markets.

All our revenue and profits stay in Australia, where we re-invest back into the economy. RDA also purchases Australian made cheese from our Australian cheese partners, so that we keep supporting all Australian dairy regions. When Australian consumer demand for cheese and dairy products becomes much higher than we are able to produce or purchase from the local dairy markets, we supplement our total cheese purchases with imported cheeses. When we are using imported products, the majority come from our New Zealand partner.



It is with pride that we wear our name on our company brand, Real Dairy Australia, and as a proud 100% Australian Owned & Operated company we will continue to support our industry & economy to the best of our abilities.

SUPPLY CHAIN

RDA procures raw materials, semi-finished products, packaging, finished goods and services from both local and international suppliers. It is important to our customers, stakeholders, and our people, that we source our products in an ethical manner. Also ensuring our suppliers also source their products ethically and operate sustainable and profitable businesses.

Suppliers are critical to our business. We build long-term relationships with all of our suppliers. This enables us to have open and honest discussions regarding their own procurement practices which often involves complex international supply chains. RDA is a trusted supplier to major retailers in Australia and other independent customers. We are proud of our place in the national market, the quality products that we produce and the relationships we have cultivated with our many suppliers.

Our main product Cheese, is sourced from the following countries;

Australia	41%
New Zealand	39%
United States	10%
Netherlands	5%
United Kingdom	2%
Ireland	2%
Germany	1%
TOTAL	100%



With other products, Packaging and Ingredients being sourced from 54 various suppliers, 53 Australian and 1 overseas from Singapore.



We pride ourselves on the fact that all of our suppliers are Tier 1, that is they provide high quality products in;

- Food Safety
- Food Quality
- Ethical Compliance
- Ethical Sustainability

This gives us a high level of certainty in their own practices and compliance with all aspects of operations including Modern Slavery.

FOCUS AREAS

We value every individual for who they are and what they bring to the team. These are the values that underpin our mission to ensure that Human Rights and Human Dignity are upheld, including reducing the risk of modern slavery in every deal, every transaction with every trading partner and within our own operations nationwide. RDA is focused on producing quality everyday food products for Australians, we have also placed additional targeted emphasis on the critical area of corporate responsibility since the introduction of the Modern Slavery Act 2018. We are committed to the eradication of modern slavery, and we will always act quickly and decisively in the best interest of affected workers wherever they are.

PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

As our base business has grown and expanded, we have treated our employees as family members. RDA operates according to its core values and understands that there is an inherent risk of exposure to the threat of modern slavery and labour exploitation in food and other supply chains from production and processing to packaging and transportation. Although RDA makes most purchases via Australian suppliers, we are mindful that certain items are produced overseas, such as cheese and packaging. RDA works closely with its suppliers to develop relationships that support mutually beneficial outcomes and strengthen our combined approach to product traceability and human rights.

RESPONSIBILITY AND DUE DILIGENCE

Overall responsibility for the organisation's anti-slavery initiatives lies with the CEO and the Senior Management Team, with HR responsible for the statement creation and for ensuring that training of internal staff is conducted.





RELEVANT POLICIES

Policies, contracts, monitoring activities, regular communication, and engagement with our team members and partners are key controls we have established to manage the potential or actual risk of modern slavery in our operations and supply chain. We have a comprehensive set of policies, standards and practices that outline our values and ways of working. We expect our partners to use the best endeavors to ensure that they do not engage in modern slavery.

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in its operations.

Employee Code of Conduct: The RDA policy describes the basic requirements, which the organisation expects its employees to adhere to. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour not only internally but also when managing its supply chain.

Supplier Code of Conduct. The RDA policy applies to all suppliers of the Company. In addition to strict compliance with the law, it requires that compliance with the core ILO labour standards is ensured, and that the environment is protected.

Labour Hire/Agency Workers: The organisation uses only reputable employment agencies to recruit staff and verifies the practices of any new agency with all agency staff are covered by minimum fair work award wages in Australia. RDA undertakes annual audits of all labour hire providers to ensure compliance.

RISK MITIGATION AND ADDRESSING MODERN SLAVERY

We expect our partners to use their best endeavours to ensure that they do not engage in modern slavery, RDA will not knowingly conduct business with suppliers who violate laws relating to employment, the environment or safety, or engage in any other unethical employment practice. We aim to ensure that our team members and suppliers understand our expectations and know how to raise a grievance or complaint should these policies, standards or practices not be followed.

Internal Reporting

RDA recognises that modern slavery is an issue globally. We will look to develop reporting procedures where employees and third parties can report any concerns regarding unethical behaviour or conduct within the business including modern slavery and human trafficking. Employees currently can report any matter to their manager.

Raising Awareness

Employee training sessions on Modern Slavery will be conducted periodically and refreshed as part of our on line training program. In addition to training employees, the organisation raises awareness and keeps familiarity by a range of various articles and documents at sites.

Induction Program

Information on Modern Slavery is provided by the Company during the Induction program.



Consultation Process

RDA operate under the management of a single leadership team, which has been consulted in the preparation and approval of this statement.

Supplier Assessment

We will conduct risks assessments across our local, national, and international supply chains

Supplier Contracts

A review of our supplier contracts will be conducted. Any requiring updates or changes pertaining to modern slavery will be prioritised and rectified immediately. We will work with our trading partners to ensure adherence to the Modern Slavery Act 2018.



THE WAY FORWARD AND OUR ASSESSMENT

To date, no instances of modern slavery have been identified in our supply chain. RDA believe that 'good ethics' is good business, has guided it through its operations, and is the basis of its values. Through this fundamental ideology, RDA has built relationships with suppliers and customers spanning many years and is recognised for its commitment to sustainability. It is through these strong relationships and regular contact with suppliers that we can regularly review our supplier assessment process, along with our suppliers' adherence to our processes.

Our existing policies are monitored regularly, and we will conduct regular audits of the modern slavery program. We will continue to evaluate suppliers and practices. The extent of actions taken to address modern slavery risks will be measured by certain quantitative metrics, such as the number of individuals trained, contracts signed with appropriate modern slavery contractual provisions, and the number of audits undertaken.

More importantly, the effectiveness of actions undertaken will be assessed by means of metrics, such as complaints via the grievance and complaints process and investigations launched, if any, and the number of successful audits and resolved non-compliances generated in ethical audits if any. RDA will continue to work closely with our team members and suppliers to further understand the potential risks of modern slavery in our supply chain. We are committed to further embedding our policies, standards, and practices across our business.

Through these actions, we believe we are helping to raise awareness of modern slavery and the actions required to effect change.



ETHICAL SOURCING AND SUPPLIER CODE OF CONDUCT

Overview

Real Dairy Australia (RDA) is committed to the sourcing of goods and services which conform with international standards, guidelines and principles of the International Labour Organisation (ILO), the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, Ethical Trade Initiative and Global Social Compliance Program.

It is a condition of continued trade with RDA that all suppliers complete this Ethical Sourcing and Supply Code of Conduct (Code of Conduct). If a supplier is a SEDEX member, it may be asked to share its self-assessment audit information. RDA reserves the right to undertake a site audit of its supplier's site if it suspects minimum standards are not being met.

Compliance Documentation

Suppliers are expected to comply with the RDA Modern Slavery Declaration, which operates concurrently with Real Dairy Australia's applicable policies and procedures as stated.

Ethical Principles and Values

The compliance documentation referred to above demonstrates the ethical values, standards, principles and guidelines which attach to our Suppliers in their commercial dealings with RDA.

Suppliers are always expected to operate in accordance with the ethical values and principles of RDA, together with maintaining full compliance with their own domestic legislation. In addition, it is an expectation of our suppliers that they demonstrate commitment to the following;

Ethical Labour Standards

Working hours and compensation must be fair and reasonable, corresponding to the applicable legal wage levels in the country where services are performed together with local regulations and national customs.

To respect the personal dignity, privacy, and rights of everyone, ensuring appropriate steps are undertaken to promote equal opportunity in the workplace with the elimination of unfair discrimination practices.

The supplier does not employ any workers under the appropriate domestic legal age and demonstrates a commitment to not becoming involved with, utilising or supporting child labour.





Work Health and Safety

Provide a safe and healthy working environment, where facilities and amenities meet the basic needs and human rights of the workers. This includes awareness, support and the necessary tools to identify and mitigate potential health hazards and risks, maintaining compliance with all applicable domestic legal and regulatory requirements.

To control workplace hazards, taking reasonably practical precautionary measures against workplace incidents, accidents and occupational illness.

Quality Assurance and Processes

In addition to compliance with all current and applicable food hygiene and food safety legislation, ensuring food supplied by the company is of good quality, the correct substance and nature and completely safe for human consumption, Suppliers are required to deliver products and services that meet the needs of RDA as contractually agreed. Such safety and quality requirements must comply with their domestic legislation.

Suppliers will have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Suppliers will address product-related issues and their potential impact during all stages of the production process

Data Protection, Intellectual Property and Confidentiality

Comply with all applicable laws concerning data protection, ensuring that any confidential information or trade secrets gained by virtue of the business activities with RDA is maintained confidential and will not be improperly used or disclosed to any unauthorised parties. Additionally, the Supplier must ensure that all workers' and business partners' privacy and intellectual property rights are maintained and protected. We recognise that modern slavery risks can occur in both Australian and overseas supply chains. We use a range of data and tools including Sedex.

Sedex is one of the world's leading ethical trade service providers working to improve conditions in global supply chains.

Market and Competition

RDA advocates fair competition globally; thus its Suppliers shall strictly comply with all applicable antitrust laws, trade practice laws, and any other laws, rules, and regulations. RDA suppliers do not enter into agreements with competitors and perform other unethical acts, which may unfairly impact competition, including, but not limited to, price-fixing or market allocations.

It is a mandatory requirement of trade with RDA that suppliers must comply with all applicable import and export control laws and regulations, including embargoes, sanctions, and anti-boycott rules.



Sustainability

Suppliers are expected to develop environmentally friendly and economical processes for production, logistics, and sales, thereby demonstrating effective environmental values.

It is expected that due diligence will be exercised by the suppliers of RDA to investigate and ensure its lower tier chain suppliers do not use hazardous and/or harmful materials in the production of the materials and products supplied.

Additionally, it is expected that RDA suppliers operate their business in an environmentally sustainable and responsible manner, in accordance with the applicable statutory and international standards, regarding environmental protection so that adverse environmental impacts may be minimised.

Ethics and Compliance

RDA does not tolerate nor accept any form of corruption. Suppliers shall not engage in any corrupt practices including without limitation to, extortion, fraud, impersonation, false declarations, bribery, money laundering, supporting or involved with terrorist or organised crime organisations or activities, illegal political contributions or other improper payments to RDA employees, representatives or agency, any customers, government official or third party, with the intention of obtaining or retaining a business or other improper advantage.

Suppliers must ensure to avoid any situations where a conflict of interest may arise. Supplier's conduct, be it professional or private, should not conflict with its relationship and responsibility to RDA, nor compromise the quality of products supplier, services performed, or jeopardise the ability to make impartial commercial decisions in Real Dairy Australia's best interest.

Supplier Declaration:

We confirm and declare that we have received, reviewed and comply with this Code of Conduct and the Real Dairy Australia (RDA) Modern Slavery Policy. We hereby commit to comply with the ethical principles, values and requirements as stated. We further agree to inform RDA immediately of any infringements which may arise under this Statement.

Completed By: Spiro Mictas

Position: CEO

Signed: 

Date: 16/8/24

Supplier Name & Company Stamp:

