Sustainably Stronger, Together

Bulla Supplier Code of Conduct

Bulla FAMILY DAIRY SINCE 1910

Sustainably Stronger Together

At Bulla Dairy Foods (Bulla), we want to create a future for dairy we can be proud of and ensure our products are sustainable for generations to come. This means partnering with farmers, contractors, service providers, and organisations who are aligned to our values and responsible sourcing commitments, working together to make our supply chains more sustainable. This Supplier Code of Conduct (Code) outlines Bulla's commitment to responsible sourcing, and what working with Bulla means.

All new and existing suppliers (any entity that provides goods or services directly or indirectly to Bulla) are expected to adhere to this Code.

We know we have a big role to play, and believe we're sustainably, stronger, together.





our commitment

Bulla is committed to responsible sourcing, ensuring that our purchased goods and services are produced ethically and sustainably. We believe in building strong, responsible supply chains that prioritise the well-being of people and the planet. This means aligning our sourcing activities to our sustainability focus areas: Our Planet, Our People, and Our Practices.

Bulla Sustainably Stronger, Together

supplier code of conduct

compliance with applicable laws and regulations

At a minimum, Bulla expects all suppliers to comply with applicable laws, regulations and relevant mandatory standards, including in relation to:

- human rights, labour rights and working conditions, health and safety, and food safety
- environmental protection, deforestation, biodiversity, waste, and wastewater management
- anti-bribery and corruption

Supplier Responsibilities:

- abide by all applicable laws in the places you operate
- where applicable law differs from this code, we expect you to comply with the more stringent regulation
- hold all relevant licenses

Where the Code refers to the law it means the laws in the jurisdiction that apply where the goods are procured, or services are performed.

operating with integrity & ethics

Bulla expects suppliers to demonstrate the highest standard of ethics and integrity in their business activities to avoid any negative implications for both parties.

Supplier Responsibilities:

- conduct activities in a manner that is fair, professional and that will not bring Bulla into disrepute
- maintain risk management policies and procedures and operate with a documented governance structure
- not engage in, either directly or indirectly, fraudulent, corrupt or collusive activities
- not offer or accept bribes, apply pressure, coercion and unfair tactics to win contracts
- ensure transparent and ethical decision making
- disclose any conflict of interest

modern slavery & human rights

Bulla has a zero-tolerance towards human rights breaches and modern slavery in all its forms including forced labour, the worst forms of child labour, and human trafficking. Therefore, Bulla expects suppliers to provide goods and services in a manner aligned with the UN Guiding Principles for Business and Human Rights, the International Labour Organisation conventions, and applicable laws.

Supplier Responsibilities

- ensure human rights are respected within your organisation:
  - no forced labour
  - employees do not pay to get a job
  - employees' rights to freedom of association are respected
  - employees are provided information on their working rights and employment terms
  - the worst forms of child labour are prevented
  - follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance

health and safety

Bulla is committed to maintaining safe and secure working conditions for employees and contractors and whereby we believe that all injuries are preventable and that no task is so important that it can't be done safely. This underpins our belief that everyone has the right to go home safely, and together we can make that happen. We expect our suppliers to have the same approach.

Supplier Responsibilities

- have a Safety policy statement that outlines how you will manage health and safety risks and impacts of your operations
- operate a safe, hygienic workplace
- be committed to developing and applying appropriate health and safety management
- provide and maintain workplaces, plant, equipment and systems of work that are fundamentally safe and healthy
- have systems in place for identifying and reporting hazards and incidents, assessing and eliminating or controlling risks and reviewing controls as far as reasonably practicable
- ensure that all incidents and injuries are accurately reported and recorded
- mark all hazardous Ingredients with international danger symbols and show the name of any hazardous material in English and also provide emergency material in English in the form of written instructions, labels or markings

Additional Resources

- Fair Work Ombudsmen

food safety and quality

Bulla is committed to a culture of ongoing sustainable success by providing its customers and consumers with safe, premium quality products. Protecting our consumers, customers and the trust in our business built over 6 generations. Sourcing high-quality materials is a core part of who we are, and we expect our suppliers to do the same.

Supplier Responsibilities

- complete all necessary steps to become a Bulla approved supplier, including access to Bulla food safety auditors
- supply safe, quality materials and services in accordance with all applicable regulations, specifications and compliance standards
- have rigorous food fraud prevention processes in place to ensure the authenticity and provenance of materials.
- supply raw materials that are GMO-free
- ensure all raw materials comply with additional standards as applicable e.g. Rainforest Alliance, RSPO, SEDEX, religious certifications etc
- provide all supporting documentation on request
- ensure all product contact packaging is food-grade
- maintain a best-practice traceability program, to provide full forward and backwards traceability of all materials

Additional Resources

- Bulla Supplier Approval Procedure
- Food Standards Code Australia and New Zealand



environmental impacts

At Bulla, we recognise that responsible management of the environmental impacts in our own operations, and in our supply chain, is important to our stakeholders and key to meeting our Sustainability goals. The focus is on preventing the long-term critical depletion of natural resources, or lasting damage to species, habitats, biodiversity and the climate.

Supplier Responsibilities

- have an environmental policy statement that outlines how you will manage environmental risks and impacts of your operations
- develop, implement, and maintain environmental management systems and procedures to identify and manage environmental risks, obligations and opportunities
- be a member of the Australian Packaging Covenant (APCO) or equivalent national commitment
- ensure packaging is free from containing PFAS
- promote the use of recycled materials to support circularity
- ensure all fibre materials supplied to Bulla (paper, pulp, cardboard) are FSC certified
- ensure all palm oil or palm oil-containing products either hold an RSPO Distributors license or be RSPO Supply Chain certified
- ensure materials containing Cocoa be Rainforest Alliance certified or equivalent



animal welfare

We are committed to ensuring that all animals in our supply chain are treated humanely and with the utmost care. We believe animals should have lives worth living. We expect our suppliers to follow the Australian Animal Welfare guidelines and the Five Freedoms Framework that address the welfare of farmed animals by minimising negative experiences

Supplier Responsibilities

- ensure infrastructure, procedures, systems and training to ensure all animals have;
    - freedom from hunger and thirst: by ready access to fresh water and a diet to maintain full health and vigour.
    - freedom from discomfort: by providing an appropriate environment including shelter and a comfortable resting area.
    - freedom from pain, injury or disease: by prevention through rapid diagnosis and treatment.
    - freedom to express normal behaviour: by providing sufficient space, proper facilities and company of the animal's own kind.
    - freedom from fear and distress: by ensuring conditions and treatment which avoid mental suffering
- alert Bulla of any animal welfare issues within your supply chain or operations
- dairy farms adhere to the Bulla Farm Quality Manual

Additional Resources

- Australian Animal Welfare
- https://kb.rspca.org.au/article-categories/rspca-policy/

retaining & sharing information

We expect our suppliers to manage information and data responsibly and ethically, and must not improperly use any private, confidential or commercially sensitive information in their possession relating to or in connection with their dealings with Bulla.

Supplier Responsibilities

- meet or exceed Bulla's External Supplier Security Standard
- undergo Bulla's security triage review and, where required, complete supplier security questionnaires
- demonstrate appropriate cybersecurity maturity, including certifications (e.g. ISO/IEC 27001) where applicable
- implement and maintain malware protection, patching, vulnerability scanning, backups, logging, and monitoring
- maintain formal cybersecurity incident management, response, and escalation procedures
- maintain accurate financial, health and safety, labour, training, and environmental records
- not misuse any private, confidential or commercially sensitive information relating to or in connection with working with Bulla
- security incidents, issues and control weaknesses related to Bulla information assets must be communicated to Bulla in a timely manner to allow for corrective action to be taken

compliance with our code

Bulla takes the values and commitments in our Supplier Code of Conduct seriously. As such, compliance with the Code is important and will be monitored throughout our relationship with suppliers. Bulla will work with suppliers to resolve and remediate any issue, where possible.

Supplier Responsibilities

- Notify Bulla of any breaches to this Code within 48 hours of identification of the breach to your key contact or, through Bulla's anonymous whistleblower hotline.

raising a concern

Bulla Dairy Foods upholds high standards of conduct and welcomes feedback from affected parties to improve our commitment to responsible sourcing.

If you have concerns about unethical behaviours or breaches of this code, we strongly encourage you to contact us.

You can do this through your Bulla point of contact. If a supplier, including their employees or contractors, does not feel comfortable contacting us directly, they can report actual or suspected breaches through our Stopline. Your input is valued, and your right to anonymity protected via our Stopline.

Telephone: 1300 30 45 50
Email: bulla@stopline.com.au
Web Portal: http://bulla.stoplinereport.com
Post: Bulla Dairy Foods C/o Stopline Pty Ltd, P.O. Box 403, Diamond Creek, Vic 3089

Additional Resources

- Bulla Whistleblower Policy

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