



Bulla Dairy Foods

2022

**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 2022 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 112 years, our family-owned and operated business has crafted award winning dairy profits 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 all team members in our business and the people throughout our extended supply chain. Our Modern Slavery Statement is an extension of our family values, that 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





Bulla's structure

Bulla is a 112-year-old family business now into its sixth generation and still owned by the same 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.

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 James Downey.



Bulla's operations

Unlike 112 years ago, when a backyard was the headquarters of the operation, the modern Bulla business of today relies on the following facilities:

- An ice cream factory in Colac, Victoria
- A cream factory in Colac, Victoria
- An Innovation Centre in Colac, Victoria
- A commercial ice cream factory in Mulgrave, Victoria
- A choc top factory in Dandenong, Victoria; and
- A large headquarters and distribution centre in Derrimut, Victoria.

Bulla 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.





Bulla's supply chain

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 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 most 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 & actions

We have continued to review and categorise each new supplier as either low, medium or high risk based upon several factors including geographical location, type of goods and services and information provided either through Sedex or from the supplier directly through their completion of a Modern Slavery questionnaire.

During the Reporting Period, Bulla commissioned a formal sustainability strategy for the period 2023-2028 to set a clear path in addressing the impact we have on our people, the communities in which we operate, and the natural environment on which dairy relies upon. Guided by our vision 'Sustainability stronger, together' this strategy aims to provide structure and focus and clearly outline the focus areas, initiatives and goals we set to achieve by working collaboratively.

The Sustainability Strategy incorporates the curation of responsible, ethical and resilient supply chains and Bulla has utilized the United Nations Sustainable Development Goals (SDGs) to help guide key focus areas. The SDGs are a set of 17 goals to help organisations contribute and measure impact against social and environmental areas to collectively advance global development. Target 8 (Decent Work and Economic Growth) includes target 8.7 which is to take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

The Sustainability Strategy will be completed during the next reporting period with the aim of approval and implementation by mid-2023.

We previously developed robust policies and procedures to assist mitigate against the risks associated with modern slavery in our business and across our supply chain. During the Reporting Period we implemented the Bulla Responsible Resourcing Policy which expressly includes our commitment to promoting and respecting human rights throughout our supply chain and requiring the same of our suppliers.

We incorporated Modern Slavery clauses into all supply agreements so 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.





effectiveness of actions taken

We assess the effectiveness of the processes and procedures Bulla utilizes to address modern slavery risks in our business and across our supply chains by tracking our actions and outcomes, partnering with suppliers and other external partners and undertaking pre-determined internal governance and external assurance processes. Our assessment has determined that most suppliers across our supply chain are low risk and the higher risk suppliers continue to be our chocolate suppliers within their own supply chains.

Our use of the Sedex platform and reformulated supplier questionnaires have been effective tools to ensure we understand and respond appropriately to modern slavery risks identified in our supply chain.

During the backend of the Reporting Period, we commenced exploring suitable third-party consultancy groups to assist in the review of our current processes and procedures (including a review and refresh of our current supplier risk assessment) and the implementation of meaningful changes to enhance the effectiveness of existing actions taken to address modern slavery at Bulla. We are also keen to work on additional effective strategies that allow us to minimise modern slavery risks posed by larger essential suppliers.

Bulla also commenced a broad ranging review of the effectiveness of existing compliance training conducted within the business which will conclude during the next reporting period and include Bulla's Code of Conduct, Responsible Sourcing Policy and the Whistleblower Policy.

This Statement was approved by the Board of Regal Cream Products Pty Ltd as Trustee for the Regal Cream Products Trust on 20 December 2022.

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

