



*Saputo*  
Dairy Australia

**Modern Slavery  
Statement**

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**2022–23**



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## Introduction

We are pleased to provide this Modern Slavery Statement (Statement) outlining the continuing actions of Saputo Dairy Australia Pty Ltd (ACN 166 135 486) (SDA) and its subsidiary AG Warehouse Pty Ltd (ACN 004 515 744) (together, we, us or our) to support the requirements of the *Modern Slavery Act 2018* (Cth) (the Act).

As a leading dairy processor in Australia, we place great importance in demonstrating good corporate citizenship in everything we do. This is integral to the [Saputo Promise](#), which extends beyond our own practices to those of our suppliers, via Saputo Inc.'s (Saputo) Supplier Code of Conduct. The Code guides the collaborative way we work with our suppliers based on shared requirements, standards and principles.

This Statement shares our progress over the past year, to 31 March 2023, as we maintain our commitment to detect and manage modern slavery risks within our business and across our supply chain.

“

*As we pursue growth, we aim to create shared value for all our stakeholders and ensure the long-term sustainability of our business while building a healthier future through our passion for quality food.*

”

— SAPUTO PROMISE REPORT 2023



### PROGRESS OVER THE PAST YEAR

- ✓ Completed the Sedex Members' Ethical Trade Audit (SMETA) program at our manufacturing sites
- ✓ Undertook a procurement process to select a new customised risk assessment platform to support supply chain monitoring and reporting, and commenced the build of this risk assessment platform
- ✓ Continued engagement with Australian dairy industry organisations to improve modern slavery awareness and understanding
- ✓ Reinforced our commitment to modern slavery with an employee training program specific to our operations, and communication of our annual Modern Slavery Statement
- ✓ Included a modern slavery obligation requirement in SDA's Quality Assurance farm program
- ✓ Launched the Saputo global Sustainable Agriculture Policy to engage with our producers and suppliers to address key sustainability challenges within the industry, including the protection of workers' rights

## KEY ACTIONS 2020–2023

2020



Established a risk assessment process as part of due diligence across our supplier base



Started using Sedex as a tool: Self-Assessment Questionnaires at SDA sites, onboarding and linking to key suppliers



Updated our processes to include modern slavery requirements in new supplier onboarding, including specific clauses in contract templates



Published and communicated inaugural Modern Slavery Statement



Actively participated in dairy industry working groups, assessing modern slavery risks and human rights in the dairy industry



Expanded our use of Sedex: continually increased linked suppliers and performed SMETAs at SDA manufacturing sites



Implemented employee modern slavery training program



2023



Reinforced our commitment to addressing modern slavery, developing an in-house modern slavery training program for employees and communicating our annual Modern Slavery Statement



Launched Saputo's global Sustainable Agriculture Policy to address key sustainability challenges within the industry, including the protection of workers' rights



Selected and commenced development of a customised risk assessment platform to further improve our scope and speed of risk assessment, monitoring and reporting

# Our structure

This Modern Slavery Statement is a joint statement covering SDA and its subsidiary, AG Warehouse.

This Statement sets out the steps taken during the 12 months ending 31 March 2023 (Reporting Period) to identify and address modern slavery risks in our operations and supply chain.

We have consulted with relevant subject matter experts across our business operations to ensure accurate inputs to, and understandings from, our modern slavery monitoring activities and investigations.

SDA is a wholly-owned subsidiary of Saputo Inc. (Saputo), a Canadian publicly traded company listed on the Toronto Stock Exchange under the symbol 'SAP'.

As at 31 March 2023, SDA employed approximately 2,800 people across Australia.

## SAPUTO OPERATING SECTORS

Saputo operates its business through four sectors – Canada, USA, Europe and International. The International Sector includes Dairy Division (Australia), which is operated by SDA, and Dairy Division (Argentina).



# Our operations and supply chain

## SDA OPERATIONS

### Dairy production

Our core business is the procurement of raw cow's milk and the production, marketing, distribution and export of a wide range of high-quality dairy and non-dairy products for domestic and international markets, including cheese, dairy alternative cheese, fluid milk, extended shelf-life milk and cream products, cultured products and dairy ingredients. As a leading dairy processor in Australia, our wide range of products are sold through major retailers, regional supermarkets and delicatessens nationwide, and in numerous countries under many well-known brands, as listed below.



Cracker Barrel is a registered trademark of Lactalis Heritage Dairy used under licence.



# Our operations and supply chain continued

## SUPPLY CHAIN

### Dairy production

We source a broad range of goods and services from thousands of suppliers across Australia and internationally, from countries including China, India, Malaysia, the Philippines, Singapore, Thailand, Denmark, France, Hungary, the United States, Brazil and New Zealand. The main types of goods and services we procure are outlined below.

### GOODS AND SERVICES IN OUR SUPPLY CHAIN



## Our operations and supply chain continued

### SDA Feeds and AG Warehouse

The operations of our SDA Feeds team and the AG Warehouse retail stores have a different supply chain to our dairy production business. These two business areas have a retail focus towards general agricultural customers and farmers, including the resale of goods, such as hay, animal nutrition, fencing, fertiliser and other on-farm products. While the supply chain may differ, they are included in our modern slavery program and risk assessment process.



#### SDA Feeds

Our SDA Feeds team sources and sells high-quality grain, meals and hay to agricultural customers and farmers. We provide access to a wide range of feed products and work directly with growers, commercial traders and the bulk handling network to offer an end-to-end service that includes purchasing, logistics and delivery, paying growers and carriers, and vendor declarations.



#### AG Warehouse

During the Reporting Period, AG Warehouse operated an agricultural retail business with 26 retail stores and seven fertiliser depots across south-eastern Australia, supported by a team of agribusiness experts.

In accordance with our Code of Ethics and Procurement Policy, our Procurement team ensures continuous, reliable and high-quality sources of supply that comply with our Supplier Code of Conduct, Code of Ethics and Procurement Policy, as well as relevant legal considerations.



## Our operations and supply chain continued

SDA's head office is located in Melbourne and, during the Reporting Period, we operated 11 processing sites across south-eastern Australia and one national logistics centre. We also have two specialty cheese retail stores located at Warrnambool and on King Island.

The nature of our arrangements with suppliers is outlined on page 5. In addition to suppliers, we have valued relationships with customers and distributors, including large retailers, cafés, restaurants and other food service businesses, government departments and authorities (domestic and international), and end consumers.

1

HEAD OFFICE

26

AG WAREHOUSE RETAIL STORES

11

PROCESSING SITES

7

AG WAREHOUSE FERTILISER DEPOTS

1

LOGISTICS CENTRE

2

CHEESE RETAIL STORES



We have zero tolerance for:

- > child labour
- > forced labour
- > an environment that incites or encourages any form of coercion and harassment
- > any major health and safety deficiency posing immediate danger to life or risk of serious injury
- > any major environmental deficiency posing serious and immediate harm to the environment or the community
- > any form of animal cruelty
- > any form of bribery

Saputo's zero tolerance approach is shared widely with our employees through Saputo's Code of Ethics and modern slavery risk training. Given some of our suppliers operate in different legal and cultural environments throughout the world, Saputo's Supplier Code of Conduct defines this list of zero tolerance issues that apply universally across our supply chain.

# Risk assessment

We consider SDA is at greater risk of contributing to or being directly linked with an incident of modern slavery, rather than directly causing an incident of modern slavery within our own operations.

During the Reporting Period, we assessed our potential to cause, contribute or be directly linked to modern slavery through our operations and supply chain. The most prevalent potential risks of modern slavery practices in our operations and supply chain are outlined below. These risks continue to be a key focus as part of our ongoing modern slavery due diligence process.

RISK TYPE	REASON FOR RISK
 <b>GEOPOLITICAL RISK</b>	Operating or maintaining relationships in countries where political systems, as well as economic and socio-cultural structures, are significantly different from those we are accustomed to in Australia
 <b>PRODUCT RISK</b>	Cost pressures or delivery timeframes that could have an unintended consequence of influencing suppliers to reduce labour conditions. Areas such as international logistics may be subject to such pressures
 <b>SECTOR RISK</b>	The use of base-skilled and sometimes temporary labour in areas of high labour intensity and low oversight, such as the cleaning, warehousing and clothing industries

While some aspects of modern slavery risk identification, mitigation and remediation are addressed through our Supplier Code of Conduct, we undertake a separate work program to identify, assess and minimise risk areas within our operations and across our supply chain.

## OUR PROCESS TO MITIGATE MODERN SLAVERY RISKS



# Risk identification, mitigation and remediation

## MODERN SLAVERY DUE DILIGENCE

Due diligence remains an essential part of our mitigation strategy. Key to our approach is working in partnership across our business and with our suppliers to ensure that, at a minimum, they understand the importance of identifying modern slavery risks, maintain relevant standards and take ongoing action to mitigate risks.

### Our operations

As part of our due diligence processes, we utilise Sedex to **review our own operational practices** through Self-Assessment Questionnaires and we continue to update these on an annual basis. In addition, we continued the SMETA program at our manufacturing sites.

### Our supply chain

We continually strive to expand our approach beyond high-risk suppliers as part of our ongoing commitment to raise awareness and combat modern slavery risks across our operations and supply chain.

During the Reporting Period, we selected a partner to develop a customised modern slavery risk assessment platform to improve our risk assessment process and reach further into our supply chain. The platform will be rolled out across the entire business in FY24 and will enable us to:

- dive deeper into the supply chain beyond our direct (Tier 1) suppliers to examine businesses that our suppliers procure goods or services from (known as Tier 2 suppliers) and the businesses that supply our Tier 2 suppliers (known as Tier 3 suppliers); and
- develop specific and targeted questionnaires based on a supplier's industry or location.

We also used Sedex Self-Assessment Questionnaires and the SMETA program to **review suppliers** that are integral to our supply chain, and suppliers that operate in sectors with high potential modern slavery risks.

During the Reporting Period, we further strengthened our due diligence process to encompass modern slavery risk assessment at all stages of our relationship with suppliers. This includes during:

- initial reviews prior to forming a partnership (e.g. seeking to understand a potential supplier's approach to modern slavery risks and their policies, and communicating our commitment to addressing modern slavery risks in our request for proposals);
- supplier/vendor onboarding (e.g. modern slavery clauses incorporated in supplier contracts and new vendor forms); and
- ongoing monitoring of established suppliers (e.g. during annual reviews).

Some of the industries we assess in detail through our due diligence process are:



Labour hire



Clothing/PPE



Warehousing



Cleaning



Bulk gypsum and fertiliser



Transport



### SMETA

*Sedex Members Ethical Trade Audit (SMETA) is Sedex's social auditing methodology, enabling businesses to assess their sites and suppliers to understand working conditions in their supply chain. It assesses a site based on an organisation's standards of labour, health and safety, environment and business ethics.*

*An auditor physically attends the site or workplace to assess the conditions on the ground.*

*Sedex is a part of our due diligence process where we monitor the SMETAs of our suppliers.*

*SMETA is the most widely used audit to understand and improve working conditions and environmental performance.*



# Risk identification, mitigation and remediation continued

## EDUCATION AND AWARENESS

We continued to provide education and communications for our workforce and suppliers to improve their awareness and understanding of modern slavery risks.

During the Reporting Period, we developed and rolled out our own modern slavery risk training for employees. The training covers our approach to modern slavery risks, how to identify and mitigate these risks and our process for remediation. A previous phase of the training was provided to existing employees and now this training program specific to our operations is undertaken by most new employees as part of our broader onboarding and induction activities.

Our focus on education and communications to help our team and suppliers understand modern slavery risks relevant to them included:

- communicating our commitment to mitigating modern slavery risks with distribution of our 2021–22 Statement in our company newsletter, *The Graze*;
- continuing employee modern slavery training, developing a program specific to our operations;
- highlighting our modern slavery efforts as part of the ‘Business Ethics’ pillar in a Saputo Promise video presented by senior leadership at employee Town Hall events across all sites; and
- ongoing discussion and input with industry and community partners to progress a modern slavery checklist for small and medium-sized enterprises and farmers.

In addition, we actively participated in the [Australian Dairy Sustainability Framework’s](#) Human Rights Working Group, which is conducting a review of the dairy supply chain to identify and assess human rights risks. A third party has been commissioned to support this work and provide an independent assessment of the potential human rights risks in the Australian dairy industry.

The Working Group includes representation from the Australian Dairy Products Federation, Australian Dairy Farmers, Dairy Australia and dairy companies. It will also develop action plans to address risks, showcase best practices by dairy businesses and track industry performance against the national commitments. Our ongoing approach to human rights will be informed by this work.

**Modern slavery information poster provided to all SDA sites.**

**MODERN SLAVERY AWARENESS**  
Saputo Dairy Australia

In today's world there are many places where modern slavery can exist, but what is modern slavery?  
Modern slavery is the exploitation of people through force, fraud or coercion, or to restrict or exploit victims and undermine their freedom. The underlying theme is one person depriving another person of their liberty in order to exploit them for personal or commercial gain.

**Modern slavery in numbers:**  
40.3m worldwide  
24.9m in Asia Pacific (approximately 61% of 100 people)  
12,000 in Australia (approximately 1 in 100 people)  
Only around 20% of victims are discovered

**Modern slavery practices:**  
Human trafficking, slavery, servitude, forced labour, debt bondage, document confiscation, forced marriage, child labour

**Types of modern slavery risk:**  
Industry, product or service, geographic, entry

**Potential signs of modern slavery:**  
• Unusually willing to work  
• Unable to terminate employment  
• Living in the workplace or a place owned by the employer  
• Restriction of movement  
• People look unwell, malnourished, unclean, poor hygiene or generally tired  
• People are nervous, struggling to understand the language  
• People are withdrawn, anxious or confused  
• People are unable to provide documents  
• Suppliers that don't take site inspections

**Who is most at risk?**  
Women, Children, Occupations with low visibility, Migrants, Refugees and people seeking asylum

**HOW TO REPORT POTENTIAL MODERN SLAVERY VIOLATIONS**  
• Send a good faith message, request S27 member or report directly to the Legal Team  
• Use our whistleblower policy to report anonymously  
• Email: [ethics@saputo.com](mailto:ethics@saputo.com) | Call: 1800 536 246 | Visit: [saputo.ethicspoint.com](http://saputo.ethicspoint.com)



# Risk identification, mitigation and remediation continued

## SAPUTO PROMISE

Beyond the scope of our operations, we believe we have a key role to play in ensuring a sustainable and equitable food system, working in partnership with our farmers, suppliers and industry partners.

In line with this, the [Saputo Promise](#) is our commitment to live up to the values on which our business was founded. It consists of seven Pillars that form the backbone of our approach to social, environmental and economic performance. Based on our values and our stakeholders' concerns, our Pillars allow us to focus our efforts where they matter most.

Anchored in the most pressing Environmental, Social and Governance (ESG) issues for our business, including modern slavery, our Saputo Promise three-year plan (FY23–FY25) builds on the momentum of the past few years, ensuring a steadfast focus on our ESG objectives and continuity so our Promise continues to drive, enable and sustain our growth.

You can read more about the Saputo Promise three-year plan and the progress made across the seven Pillars in our [Saputo Promise Report](#).

“

*The Saputo Promise consists of seven Pillars which drive our actions to nourish, protect, and support the communities we call home.*

”

— 2023 SAPUTO PROMISE REPORT

## SAPUTO PROMISE PILLARS



### Food Quality & Safety

We set the bar for food quality and safety to the highest level. Our employees not only uphold industry-leading standards, but are also empowered to continually improve them.



### Nutrition

We've paved the way for nutritious and quality products since we were founded. We continue to innovate by creating value-add ingredients and products that nourish all lifestyles.



### Environment

We strive to pursue growth as a world-class dairy processor, while minimising the environmental impacts of our activities.



### Responsible Sourcing

We care deeply about the way our ingredients are produced, and expect the same from our suppliers.



### Business Ethics

Our reputation for business integrity is important to us. Integrity is one of our founding values and guides us in our day-to-day operations.



### Our People

Our best comes from our people. We foster a culture of safety, empowerment and support so they can bring their most authentic self to work.



### Community

We believe in leaving a meaningful mark where our employees live, work and play. So we give back, investing both our time and money to build upward and forward.



# Risk identification, mitigation and remediation continued

## GOVERNANCE FRAMEWORK

We value our reputation for business integrity. Oversight of our approach to identifying modern slavery risks is embedded in the governance framework of the Saputo Promise, which supports our strong focus on business ethics and responsible sourcing. This is overseen by a dedicated working group consisting of relevant senior leaders across the business.

Saputo's Corporate Responsibility Committee oversees implementation of the Saputo Promise and monitors progress for each of its seven Pillars. The President and Chief Operating Officer of SDA sits on the Corporate Responsibility Committee, and has accountability for and ownership of our performance.

In line with our commitment to continuous improvement, our policies continually evolve to reflect the changing needs of our customers and the marketplace. We constantly monitor compliance with legislative and regulatory requirements, and review and consider recent developments, leading practices and trends.

### CODE OF ETHICS

Saputo's [Code of Ethics](#) guides the daily conduct of all employees, directors and officers to maintain a high level of business integrity.

Day-to-day operations are guided by six principles within the Code of Ethics:

Act with integrity and behave ethically

Treat people with respect and without discrimination

Safeguard the confidentiality of information

Avoid conflicts of interest

Respect the organisation

Comply with the Law

“

*Together, let's do what's right. We seek to do business fairly and honestly, without the use of unethical or illegal business practices.*

”

— CODE OF ETHICS



Saputo's Code of Ethics includes a strict prohibition on all forms of modern slavery, including forced labour and child labour.

#### FORCED LABOUR:

“ *The use of labour under any form of indentured servitude is prohibited.* ”

#### CHILD LABOUR:

“ *In accordance with applicable Laws, and more specifically the International Labour Organization (ILO) Conventions, you are strictly forbidden from making use of Child Labour on behalf of Saputo.* ”

— CODE OF ETHICS

Code of Ethics training is compulsory for all our employees and they are required to electronically sign confirmation that training has been completed. All new employees are required to complete the training as part of our onboarding process.

# Risk identification, mitigation and remediation continued

## WHISTLEBLOWER POLICY

Our [Whistleblower Policy](#) is publicly available and encourages our employees and third parties with a connection to SDA to confidentially and anonymously report any modern slavery concerns or other reportable conduct. This may include fraud, corruption, illegal or unethical business practices, criminal behaviour and breaches of legislation. A dedicated whistleblower phone, website and email address are maintained for this purpose.

Our Reportable Conduct Committee determines whether an allegation raised should be investigated and will conduct or commission an investigation as appropriate.



**Phone:**  
**1800 504 246**



**Email:**  
**[ethics@saputo.com](mailto:ethics@saputo.com)**

**Website:**  
**[www.saputo.ethicspoint.com](http://www.saputo.ethicspoint.com)**



# Risk identification, mitigation and remediation continued

## SUPPLIER CODE OF CONDUCT

The Saputo [Supplier Code of Conduct](#) sets the minimum standards of business conduct we expect from our suppliers. It applies to conduct, decisions, actions and interactions with Saputo, including with our employees, officers, directors and agents, as well as our third-party contractors. A commitment to comply with our Supplier Code of Conduct is contained in our standard supply agreements.

The Supplier Code of Conduct describes our monitoring and enforcement processes. This includes protocols for addressing situations when presented with credible evidence of a Supplier Code of Conduct breach. For instance, we may immediately suspend receiving goods or services from a supplier while allegations are investigated and validated by appropriate authorities and/or independent third-party experts. Any suspended suppliers will be expected to meet our reinstatement criteria in order to resume business with us.

### Our Supplier Code of Conduct remediation measures include:

- 1 Investigation, inspection and audit
- 2 Establishment and completion, to the satisfaction of SDA, of a time-bound remedial action plan
- 3 Suspension of supply if a supplier is in breach and until SDA is satisfied that appropriate reinstatement criteria have been met

The Code is published online at [www.saputo.com](http://www.saputo.com) to ensure it is readily accessible to our employees and workers across our supply chain.

We include termination mechanisms in our standard form agreements, reserving the right to terminate supply if we are not satisfied that a modern slavery concern has been appropriately resolved.



*Relationships are important to Saputo and vital to our ability to make high-quality products. We aim to create an environment where we can build strong, sustainable and long-term relationships with our suppliers, employees and customers.*

**– SAPUTO SUPPLIER CODE OF CONDUCT**

# Risk identification, mitigation and remediation continued

## REMEDIATION

During the Reporting Period, we did not identify any significant modern slavery risks requiring additional remediation steps beyond the detailed risk assessment and the case study actions described below.

As part of ongoing efforts to understand our supply chain, we continue to work with a very small number of our suppliers on their processes, to enhance our due diligence investigations. This includes spot checks on suppliers' right to work checks with their employees, ensuring best practice is followed.

### ADDRESSING MODERN SLAVERY RISKS IN OUR OPERATIONS

Modern slavery risks identified in our own operations are reviewed by a cross-divisional team, including Procurement, Legal, Corporate Responsibility and other relevant areas of the business (as the circumstances warrant), such as Operations or Human Resources.

If, as a result of investigations, it is determined an employee has breached company standards in relation to modern slavery, they may be subject to disciplinary action, or even termination of employment in accordance with Saputo's Code of Ethics.

### ADDRESSING MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

We have a number of measures in place to address any modern slavery risks found in our supply chain:

- 1 Our first step is to investigate potential suppliers as part of our due diligence pre-assessment process prior to engagement, to understand their position in relation to modern slavery risk.
- 2 Our next step is onboarding a supplier to Sedex, requiring them to review their risks using the Self-Assessment Questionnaire, or alternatively we review a supplier's internal policies, such as labour and ethical policies or codes of conduct.
- 3 If there is still deemed to be a risk, we engage with the supplier on a remediation plan to mitigate any identified risks, and may request a relevant audit (such as SMETA).
- 4 The final stage in addressing a supply chain risk is to postpone or stop trading with a supplier until the issue has been resolved and we are satisfied that appropriate reinstatement criteria have been met.



#### Case study: Managing risk once identified

Through our monitoring of the media, we became aware of a potential modern slavery impact within our supply chain relating to PPE we purchase.

Our Procurement team contacted our supplier immediately upon news of the potential impact, who confirmed the product supplied to our sites was not manufactured in the factory or region identified as potentially being in breach of modern slavery standards.



## Monitoring effectiveness

Our approach to modern slavery risks is ongoing and continually evolving. We regularly learn and embed improved practices into our business-as-usual operations.

We acknowledge that measuring the effectiveness of our actions is inherently complex. Given this, we have a number of metrics that we use to measure the breadth of our modern slavery risk program:

- ✓ Number of suppliers formally linked with us via Sedex and our customised risk assessment platform, and the percentage spend they cover
- ✓ Number of suppliers whose risk and the percentage spend they cover has been assessed
- ✓ Number of employees trained on modern slavery over defined periods

There are also some qualitative aspects to our risk program that we action and look to improve, but these are harder to measure against, including:

- collaboration with industry organisations about increasing awareness of modern slavery across different industries; and
- constant review and refinement of our risk assessment process.

In addition, we continue expanding our use of Sedex and other risk assessment tools to manage modern slavery risks, using the system to also monitor the effectiveness of our actions in assessing and addressing risks and tracking remediation.

## Future actions

We remain committed to further developing and continuously refining our risk program as we learn more about our modern slavery risks and ways to mitigate them.

### FOR THE COMING YEAR, OUR FOCUS WILL INCLUDE:

Implement our customised risk assessment platform with key suppliers to support supply chain monitoring and reporting

Continue to work with the Australian Dairy Sustainability Framework's Human Rights Working Group

Execute Saputo's global Sustainable Agriculture Policy (which forms part of the Milk Supply Agreements with SDA's farmer suppliers from 1 July 2023), to support the responsible production of dairy ingredients

Include specific modern slavery compliance questions into our Quality Assurance farm audit program, Simply Safe

Continue our Roundtable on Sustainable Palm Oil (RSPO) program to complete certification of Saputo operations globally and continue to procure 100 per cent RSPO-certified palm oil

## Statement approval

This Statement has been reviewed and approved by the Senior Leadership Team of SDA and the Board of SDA.



**Richard Wallace**  
President and Chief Operating Officer, Saputo Dairy Australia Pty Ltd