

## NOMAD FOODS EUROPE LIMITED AND BIRDS EYE LIMITED

### MODERN SLAVERY ACT TRANSPARENCY STATEMENT

#### **Introduction**

This statement is made pursuant to section 54 (part 6) of the Modern Slavery Act 2015 and constitutes the Modern Slavery Act Transparency Statement for Nomad Foods Europe Limited (“**Nomad UK**”) and Birds Eye Limited (“**Birds Eye**”) for the financial year ending 31 December 2017.

Nomad UK and Birds Eye are part of Nomad Foods Limited, Europe’s biggest frozen food company producing, marketing and distributing branded frozen food products in 10 countries across Europe, employing over 4,200 people in 17 countries, with 12 factories. Core brands include Birds Eye, Findus and Iglo.

Nomad Foods Group is committed to a corporate social responsibility that fosters a culture with respect for dignity and human rights as well as high ethical standards in the conduct of its business.

This Statement sets out the actions taken to evaluate and understand potential modern slavery risks pertaining to the business of Nomad UK and Birds Eye’s and their respective supply chains as well as measures presently put in place to mitigate the possibility of occurrence of slavery and human trafficking in our business and supply chains.

#### **Our Approach and Policies**

We recognise that the supply chain of food production and processing is one of the sectors which may be vulnerable to modern slavery, particularly due to the global nature of suppliers. The broad scope of our suppliers, which varies from small to large multinational companies located in all continents, requires significant efforts and dedication in order to manage business, health and sustainability issues. Although ultimately, it is each supplier’s responsibility to respect human rights and environmental issues, Nomad Foods Group has made it its goal to take up an active role in ensuring that such responsibility is acted on, in accordance with our standards. Careful profiling enables us to identify supply chains which may require special scrutiny in this regard.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. Policies are developed by subject matter experts and signed off by group functional heads and approved at director level.

These policies include:

1. *Supplier Code of Conduct*: This Code was launched early 2018 and will be rolled out during the remainder of 2018. It contains the basic principles of what we expect from both direct and indirect suppliers to the Nomad Foods Group and the minimum legal and ethical requirements they need to meet. These obligations require our suppliers to prevent occurrences modern slavery in their supply chain and state the specific human rights, labour and social laws, regulations and international conventions which we they must abide by. The *Supplier Code of Conduct* replaces the existing *Ethical Trading Code of Practice* which was introduced in 2014. Compliance with our Code of Conduct will be mandatory for our suppliers.
2. *Code of Business Principles*: This code was revised and relaunched in March 2018 given the increased size and sophistication of our group and sets out our ethical standards and the manner in which we behave as an organisation, our responsibilities, and how we expect our employees and suppliers to act. It can be found on our website.
3. *Recruitment Policy*: We operate a robust recruitment policy and conduct eligibility evaluations, designed to safeguard against human trafficking (or individuals being forced to work against their will) by ensuring applicants are entitled to work in the United Kingdom; and
4. *Whistleblowing Policy*: This measure instils a culture whereby all employees should feel free to raise concerns about how colleagues are being treated or in connection with practices within our business or supply chain, without fear of reprisals.

## Suppliers

Nomad UK and Birds Eye have an ongoing commitment to engaging only those suppliers that uphold the same principles as we do and, where necessary, ensure the implementation of corrective action measures. In the event that a supplier fails to take steps to cease or prevent adverse human rights impacts, Nomad UK or Birds Eye (as applicable) will examine its business relationship with such supplier with a view to remedying the situation.

In 2017 Nomad Foods deployed its own supplier questionnaire, which is used (amongst other things) to review the status of the group's supplier base's ethical trading standards. It is our goal to collate such data on an annual basis, so that we can be in a position to hold the latest and best information from our supply base. This information is used to contact risk assessments, and focus the efforts of our auditing programme.

To support this, Nomad UK is an AB member of the Supplier Ethical Data Exchange ("SEDEX"), which is a web-based system that allows us to share and view data on ethical and responsible business practices of other SEDEX member companies, including information on labour standards, health and safety, the environment and business ethics. We see SEDEX as an important part of our responsible sourcing practices and we are working to ensure that all of our suppliers also join SEDEX. We further expect all our suppliers to be registered as B members of SEDEX and complete a self-audit questionnaire on the SEDEX database. We have made positive strides towards compliance with this recent requirement in 2017, and have the ambition 100% of our direct suppliers will comply with this by the end of 2018.

Using this information, we identify suppliers from whom we consider that an independent ethical audit report (such as SEDEX Members Ethical Trade Audit standard or similar) may be desirable and request its submission for review.

### **Risk Assessment & Auditing**

Our Group Supplier Assurance team runs an ethical audit programme alongside our consumer safety audit programme. These audits are guided by the information we receive from the SEDEX programme, along with other factors such as geographical risk areas and our supplier performance history, which we use to plan and prioritise our auditing accordingly. We have already funded 27 SEDEX Member Ethical Audits (SMETA) in our supply base within the last 3 years and we are looking to proceed with a similar level of auditing in the future.

### **Training**

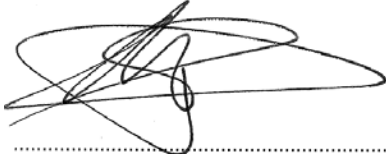
In order to ensure that all our key staff understand and are aware of the risks of modern slavery and human trafficking and can assist us in its prevention, both in our business and in our supply chain, training continues to be provided to representatives from our management teams, CSR teams, procurement teams and supply chain assurance teams.

Our Supplier Assurance Team has undertaken internal SEDEX training. In addition, our Supplier Assurance Ethical Team has undertaken an Ethical Training Initiative (ETI) training course and our Procurement team undertook an ethical overview training session in Feb 2017. Further training will be delivered in connection with the Supplier Code of Conduct when it is launched.

### **Responsibility and Effectiveness**

Since the passing of the Modern Slavery Act in 2015, this is Nomad Foods' second statement on compliance. In 2017, we have taken significant actions and in 2018 our approach and endeavours in tackling the issue of modern slavery will continue and we expect them to be refined and evolve over time.

We recognise the importance of maintaining constant vigilance to identify and address any impacts associated with slavery and human trafficking throughout our supply chains. In recognition of these issues, we remain committed to continue upholding human rights and safety in our supply chains and we will be reviewing the progress and effectiveness of our programmes in combatting slavery and human trafficking on an annual basis.



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**Stefan Descheemaeker**  
Director

**On behalf of Nomad Foods Europe Limited**

Date: 30 April 2018



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**Wayne Hudson**  
Director

**On behalf of Birds Eye Limited**

Date: 30 April 2018