

## NOMAD FOODS

### Supplier Code of Conduct



This Supplier Code of Conduct is supplemental to any contract which governs the supply of goods or the provision of services between a supplier and Nomad Foods and is not intended to conflict with or modify the terms of any such contract. In the event of a conflict, the terms of the contract shall prevail.

## Nomad Foods Supplier Code of Conduct

### 1. Introduction

Nomad Foods Europe Limited (“Nomad Foods”) is Europe’s leading frozen foods company, operating across Europe, in different countries, with long established and trusted brands like Birds Eye, Findus and Iglo. We are fully aware of our responsibilities to customers and other stakeholders and continually shape our response to assess supply chain risks, working daily to meet all our legal and regulatory, ethical, environmental, social, and health and safety obligations.

We can only achieve this with the cooperation of all of our supply chain partners, which we hold to the same standards as ourselves. That is the purpose of our Supplier Code of Conduct. It applies to all suppliers of Nomad Foods, whether direct or indirect suppliers, co-packers, contractors, agents or any external party doing business with Nomad Foods (“Suppliers”). It enables us to engage with our Suppliers on material sustainability issues relating to their operations, and to set minimum criteria set out in this Supplier Code of Conduct. In enforcing this Code, we will apply a risk-based supply chain approach, putting more resources and focus on suppliers, subjects or regions we consider to be of higher risk.

### 2. Our Way of Working

#### (a) Legal Compliance

Suppliers shall in general comply with all applicable and relevant laws and regulations that govern their business operations and activities.

#### (b) Human Rights, Ethical and Social Standards and Respect for Individuals

Suppliers shall comply with applicable human rights laws and regulations<sup>1</sup> and, in particular:

- Treat all workers with respect and dignity and not permit harassment or labour practices which involve the harsh or inhumane treatment of workers.
- Not employ child workers<sup>2</sup> for any services or products in any country, and have a documented policy to prevent it.
- Support equal opportunities and not allow discrimination, including in hiring practices.
- Provide all locally required workers’ benefits and written, understandable labour conditions, including the higher of minimum or living wages, overtime and paid leave, to all workers.
- With respect to union rights, uphold the stronger of the ILO standard or applicable local social and collective action rights of workers.

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<sup>1</sup> For a list of applicable human rights, labour and social laws and regulations, see Appendix 1.

<sup>2</sup> We uphold the International Labour Organization (ILO) Minimum Age Convention No. 138, which sets the basic minimum age at which a child may be employed at 15 years of age, and the minimum age for hazardous work at 18 years of age. If local minimum age law is set at 14 years of age in accordance with developing country exceptions to ILO Convention No. 138, the lower will apply. When local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies.

- Take all possible steps to prevent any instances of modern slavery and human trafficking, including prison, indentured and bonded labour<sup>3</sup>, and exploitation.

**(c) Health, Safety and Quality**

Suppliers shall comply with applicable and relevant health, safety and product quality laws, regulations and standards, and in particular:

- Provide safe and healthy working conditions for its employees, and safe and healthy living quarters adjacent to factory premises when required by local law.
- Designate the responsibility for health and safety to senior management.
- Have a Health & Safety Policy freely available to all employees to access at any time.
- Demonstrate compliance with the policy and continuously strive to minimise accidents and risks, including regular awareness and training sessions for all employees.

**(d) Fair Business Practices**

Suppliers shall comply with applicable anti-bribery, anti-corruption and competition laws, regulations and standards, and in particular:

- Shall not be involved in any form of bribery or corruption, and shall avoid facilitation payments as well as giving or accepting improper gifts and hospitality.
- Operate in accordance with the principles of free enterprise and fair market competition.
- Have in place adequate policies, procedures or practices to ensure compliance with the preceding obligations.

**(e) Trade Regulation**

Suppliers shall comply with all applicable laws and regulations concerning import and export, trade embargoes and sanctions, and in particular:

- Not directly or indirectly provide Nomad Foods with any service or material from a country, entity or person that is subject to trade sanctions or embargoes (typically referred to as 'Blacklisted', 'Restricted' or 'Denied Parties').
- Implement appropriate due diligence, screening and compliance procedures or practices in order to ensure compliance with the above obligations.

**(f) Environmental**

Suppliers shall comply with all relevant environmental laws and regulations and recognise their responsibility to the local and global environment in which they operate by conducting business in a way that does not have negative impact on the planet or natural resources, and in particular:

- Manage water, energy and other natural resources responsibly
- Actively reduce emissions, carbon footprint and waste
- Conduct regular carbon footprint analysis or Life Cycle Assessment to understand the impact of their business on the environment and take action as necessary
- Maintain biodiversity, protect wildlife and endangered species

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<sup>3</sup> For definitions of modern slavery, human trafficking, forced labour, and other references, we refer to the ILO Forced Labour Convention No. 29 and the UK Modern Slavery Act 2015 and to Appendix 1.  
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- Show responsibility towards the communities in which they operate, and manage community impact resulting from company and factory operations.

**(g) Supply Chain Responsibility and Traceability**

- Suppliers shall ensure that their own suppliers (and, if such supplier is a non-producing supplier, like an agent or trader, that supplier's own supplier), either comply with this Code of Conduct or an equivalent thereof.
- Suppliers shall map out their supply chain and ensure full details including name and description of the party, location and country of origin of the product for both their supplier and that party's own supplier to ensure full traceability and that this material is available for inspection at any time.

**3. Monitoring, Engagement and Improvement**

Nomad Foods and its Suppliers will ensure ongoing compliance with and improvement of the Supplier Code of Conduct as follows:

- Nomad Foods welcomes open dialogue about meeting the criteria of this Code of Conduct and expects all Suppliers to reflect the willingness to live up to its standards.
- Suppliers shall have or work towards a culture of continuous improvement.
- Suppliers shall register on the Sedex database<sup>4</sup> as B Member and keep such membership at all times, assuring full linkage to Nomad Foods.
- Suppliers must fully complete the Supplier Sedex Self-Assessment Questionnaire.
- Nomad Foods reserves the right to carry out (un)announced assessments of any supplier, including the right to conduct an independent Ethical Trading Audit.

**4. Consequences of Non-Compliance**

Nomad Foods will work with its Suppliers to help them comply with the Suppliers Code of Conduct, recognizing that withdrawal of Nomad Foods' business may cause hardship and loss of employment.

- Nomad Foods will apply the key principle of "Protect, Respect and Remedy" in line with the United Nations Guiding Principles on Business and Human Rights.
- Suppliers shall be aware of any non-compliance, proactively take corrective action when necessary, and inform Nomad Foods accordingly.
- Nomad Foods reserves the right to cease buying products or services from Suppliers in case of international trade sanctions or embargoes, or non-compliance.

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<sup>4</sup> For more information, please visit [www.sedex.org.uk](http://www.sedex.org.uk) or [www.sedexglobal.com](http://www.sedexglobal.com) and Appendix 2.  
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### Introduction to the Appendices

The Nomad Foods Supplier Code of Conduct sets out the main principles, standards and criteria that all Suppliers should abide. In addition, certain Suppliers will be asked to comply with additional technical standards or guidelines, laid out in Appendices, which form part of the Supplier Code of Conduct, but are supplementary to it. These Appendices only apply to the subject matter and the applicable Supplier. Whereas the Supplier Code of Conduct is principle-based, the following Appendices are more detailed and rule-based.

In case of any conflict or confusion between the Supplier Code of Conduct, its Appendices and the applicable laws or regulations, Suppliers should follow the law, regulation or standard that ensures the best result or protection, always in discussion and cooperation with Nomad Foods.

This Supplier Code of Conduct replaces the Nomad Foods Europe Ethical Trading Code of Practice and related supplier codes as of February 2018. Together with the Nomad Foods Code of Business Principles, the Supplier Code of Conduct also replaces any existing Nomad Foods Corporate Social Responsibility code or policy.

## Appendix 1 – Applicable Laws and Regulations

Nomad Foods abides by or seeks guidance from the laws, regulations and guidelines below, and expects its Suppliers to do the same. Where there laws or regulations conflict, suppliers shall support whichever law or regulation provides the stronger protection.

- [Principles of the United Nations Global Compact](#)
- [The UN Declaration of Human Rights](#)
- [The UN Guiding Principles on Business and Human Rights](#)
- [International Labour Organisation \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)

or one of the following alternatives:

- [Business Social Compliance Initiative \(BSCI\) Audit](#)
  - [Social Accountability 8000 \(SA 8000\) standard](#)
  - [Initiative Clause Sociale \(ICS\)](#)
  - [ILO Forced Labour Convention No. 29](#)
  - [The UK Modern Slavery Act of 2015](#)
  - [The Ethical Trading Initiative Base Code](#)
  - [The US Foreign Corrupt Practices Act](#)
  - [The UK Bribery Act](#)
  - [The OECD Guidelines on Anti-Corruption](#)
  - [178/2002/EC](#) General Food Safety Regulation
  - Animal Products Legislation
    - Aquaculture [2006/88/EC](#)
    - Poultry [2002/99/EC/136/2004/EC](#)
    - Other meats [206/2010/EC,1099/2009/EC/2009/821/EC/136/2004/EC](#)
    - Milk & Milk Products [2002/99/EC,605/2010/EC,97/78/EC](#)
    - Other products of Animal Origin [2002/99/EC,2003/812/EC](#)
  - Food Hygiene Regulations [852/853/854/2004/EC](#)
  - Food Information to Consumers Regulation [1169/2011/EC](#)
  - Nutrition & Health Claims Regulations [1924/2006/EC](#)
  - Unfair & Misleading Commercial Practices Directive [2005/29/EC](#)
  - Pesticides [EC/96/2005, 540/2001/EU](#)
  - Contaminants [EC/181/2006](#)
  - Food Improvements Agents Package (FIAP) [1332/ 1333/ 1334/ 2008/EC, Database, Solvents](#)
- And all related food safety and standards laws as applicable

## Appendix 2 – Compliance and Accreditation

We require our suppliers to demonstrate compliance and accreditation as follows:

- Independent Ethical Trading Auditor confirms onto the Sedex register that the Supplier meets the Ethical Trading Initiative Base Code (ETI BC), or one of the following alternatives:
  - [Sedex Members Ethical Trade Audit \(SMETA\)](#)
  - [Business Social Compliance Initiative \(BSCI\) Audit](#)
  - [Social Accountability 8000 \(SA 8000\) standard](#)
  - [Initiative Clause Sociale \(ICS\)](#)
- The above audit and report is repeated every two (2) years and will state that the Supplier and its Suppliers commit to meeting one of the above standards
- We require that food operators, packaging materials suppliers, agents, brokers, storage and distribution operators comply with Global Food Safety Initiative (GFSI) or equivalent standards. We recognise the following:
  - [British Retail Consortium \(BRC\) Global Standards](#)
  - [International Food Standard \(IFS\) Scheme](#)
- For the following materials we expect compliance to chain of custody accreditation:
  - Fish
    - [Marine Stewardship Council \(MSC\)](#)
    - [Aquaculture Stewardship Council \(ASC\)](#)
  - Palm oil
    - [Roundtable on Sustainable Palm Oil \(RSPO\)](#)
  - Organic materials
    - EU directive [EC/834/2007](#) and or country equivalent standard
- Nomad Foods operates its own audit scheme and we expect that suppliers or their suppliers permit access for Nomad Foods or its agents. Nomad Foods reserves the right to conduct these audits on an unannounced basis
- Failure to comply with any of the named standards, schemes or certifications will be deemed a breach of contract and we reserve the right to terminate
- We require all suppliers to comply with the agreed supplied materials specifications as defined by Nomad Foods

## Appendix 3 – Standards, policies and subjects under revision

- Agriculture
- Palm oil
- Clean Label
- Meat sourcing
- Wild and farmed fish
- Genetically Modified Foods (GMO)
- Nutrition standards
- Soy
- High risk ingredients
- Greenhouse Gas (GHR) emissions
- Packaging
- Diversity/Equality