

NOMAD FOODS EUROPE LIMITED AND BIRDS EYE LIMITED
UK MODERN SLAVERY ACT TRANSPARENCY STATEMENT
AND
FINDUS NORGE AS
NORWEGIAN TRANSPARENCY ACT STATEMENT

Introduction

This statement constitutes

(a) the Modern Slavery Act Transparency Statement for Nomad Foods Europe Limited (“**Nomad**”), and Birds Eye Limited (“**Birds Eye**”) for the financial year ending 31 December 2021, made pursuant to section 54 (part 6) of the UK Modern Slavery Act 2015, and has been approved by the board of each company on 5th May 2022; and

(b) an account of due diligence for Findus Norge AS (“**Findus**”) for the financial year ending 31 December 2021, made pursuant to section 5 of the Norwegian Transparency Act (åpenhetsloven) 2022, and has been approved by the board on 25th May 2022.

Nomad, Birds Eye and Findus (together, “**Reporting Companies**”) are part of the Nomad Foods Group, Europe’s biggest frozen food business producing, marketing and distributing branded frozen food products in 22 countries across Europe, employing approximately 8,000 people, with 19 factories. Core brands include Birds Eye, Findus, iglo, Aunt Bessie’s, Goodfella’s, Frikom and Ledo.

The 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 the Reporting Companies and their respective supply chains as well as measures put in place to mitigate the possibility of occurrence of slavery and human trafficking in our business and supply chains.

Our Approach, Policies and Procedures

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 traders to large multinational companies located in all continents, means that significant effort and dedication is required in order to manage business, health and sustainability issues. Although ultimately it is each supplier's responsibility to respect human rights and environmental issues, the Nomad Foods Group has made it a goal to take up an active role in ensuring that such responsibility is acted on, in accordance with our standards. Our Ethical Compliance Manager is responsible for making sure that our suppliers meet our expectations on all issues surrounding human rights as outlined in our *Supplier Code of Conduct*, which all suppliers are required to adhere to. The Ethical Roadmap which outlines the priorities for the next 3 years was signed off by the Sustainability Steering Committee in 2019.

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 and rolled out in 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 of modern slavery in their supply chain and state the specific human rights, labour and social laws, regulations and international conventions which they must abide by. The *Supplier Code of Conduct* replaced our *Ethical Trading Code of Practice*, which was introduced in 2014. Compliance with relevant parts of our *Supplier Code of Conduct* is mandatory for our suppliers. A copy of the Code can be found on our website. In the Supplier Code of Conduct we have identified the salient human rights issues to Nomad as a food business, they are:
 - Harassment and inhumane treatment
 - Forced labour
 - Discrimination
 - Wages
 - Working hours
 - Freedom of association
 - Health & Safety
2. *Code of Business Principles*: This Code, revised in 2020, sets out our ethical standards and the manner in which we behave as an organisation, our responsibilities, and how we expect our directors and employees to act. It can also be found on our website.
3. *Human Trafficking and Anti-Slavery Policy*: This policy further supplements our *Code of Business Principles* and sets out our commitment to implement and enforce effective systems and controls to ensure that Modern Slavery is not taking place anywhere in our own business or in any of our supply chains.

4. *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.
5. *Whistleblowing Policy:* This measure instils a culture whereby all employees can 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. Concerns can be raised via an independent third-party hotline.

Alongside these policies are the following procedures:

1. *Supplier Onboarding Procedure:* Sustainability and Ethical standards are included as an approval gate in the supplier onboarding process. All new suppliers need to meet at least the minimum requirements set out in the *Supplier Code of Conduct* before they can be approved.
2. *Sustainability Procedure:* This procedure fully details the responsibilities, approach, policies and processes relating to our Sustainability requirements.
3. *Non-Compliance Procedure:* This procedure outlines the approach and steps taken when a Sustainability related non-compliance is identified against one of our policies.

Suppliers

The Reporting Companies 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 measures. In the event that a supplier fails to take steps to cease or prevent adverse human rights impacts, the relevant Reporting Company will examine its business relationship with such supplier with a view to remedying the situation.

In 2021, the Nomad Foods Group continued to deploy its own supplier questionnaire, which is used (amongst other things) to review the status of suppliers' 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 conduct risk assessments and focus the efforts of our auditing programme.

To support this, the Nomad Foods Group 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 register as B members of SEDEX and complete a self-audit questionnaire on the SEDEX database. Using this information, we have the ability to 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.

Like many businesses, the Covid-19 pandemic has affected our supply chain in a number of ways, which has led to some challenges but in the last year we have maintained the number of suppliers registered on SEDEX to 95%. In 2022, our aim is to maintain the SEDEX registration at 95% of our suppliers in the existing Nomad businesses and we will develop implementation plans with timelines for when suppliers from our new acquisitions will be onboarded onto SEDEX.

As members of SEDEX we get access to the Supplier Risk Assessment Tool (“**Radar**”), which uses data from a 3rd party risk analytics company. Radar assesses and scores the following areas:

- Forced labour
- Freedom of association
- Health, safety & hygiene
- Children & young workers
- Regular employment
- Wages
- Working hours
- Discrimination
- Gender
- Business ethics
- Biodiversity
- Energy & emissions
- Water
- Waste & pollution

Radar covers all types of workers in our supplier including women, migrant workers and agency or 3rd party contracted labour. The data in Radar enables us to assess risk by site, country, sector and product area. These are split between 3 tools within Radar which are:

- **Pre-screen** – This report covers risk within countries, sectors and commodities
- **Risk Assessment** – This report combines the information from pre-screen with data provided by suppliers (e.g. Sedex SAQ) to calculate a risk score
- **Site Assessment** – Deep dive into a single site to understand where and why risks have been identified

All the reports and data in Radar help identify high risk suppliers for audit each year. The data is also used to assess new suppliers and suppliers from mergers or acquisitions. Alongside this each year we also identify suppliers for audit that are strategic to the our business. A supplier could be deemed “strategic” due to high spend, number of products supplied or importance of category or product to the business. This forms the audit plan for the year for both new and existing suppliers.

In 2021 the audit program included 16 sites that were classified as high-risk without an in date or valid audit in place and our top 50 spend suppliers, as part of our plans to mitigate any potential human rights risks. In total 131 3rd party ethical audits were completed in 2021, which exceeded the original plans for the year. The most common non-compliances identified were health & safety and excessive working hours or overtime, in line with the salient human rights issues in our Supplier Code of Conduct. To remediate the non-compliances found, corrective actions plans were put in place for the necessary sites. This was to ensure the non-compliances were resolved and verified by the audit company within the given timelines for each issue found. The verification method will depend on the type of non-compliances, some can be closed off by desktop review whilst others will require a follow up audit. We support our suppliers through the remediation process and regularly check in to understand progress or any potential delays. However, if the supplier fails to commit to completing the corrective action plan then another option for remediation is to source from an alternative supplier that is committed and meets our requirements. This is a last resort as our aim is to support our suppliers on the journey of continuous improvement which in turn should have a positive impact on the workers in our supply chain.

Training, Engagement and Resourcing

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 our Management Team, Sustainability Team, Procurement Team and relevant members of the Supplier Assurance Team. This continuing training program includes an Introduction to Ethical training, which outlined the basics about modern slavery and examples of ethical issues within the supply chain. The training also detailed the priorities and key activities within the Ethical Roadmap for the Reporting Companies. In 2021 all new starters within Procurement teams had an onboarding session which gave an introduction to Ethical, information on the Ethical Standards Roadmap and what is expected of them.

In 2021 we developed the Introduction to Ethical Standards training into an e-learning tool which will be mandatory for new starters in the Procurement, Supplier Assurance and R&D teams.

The Procurement, R&D and Quality teams are engaged and updated on a monthly basis by our Ethical Compliance Manager. These sessions are to educate, align on decisions needed and gain feedback on proposed changes. When key decisions are required these are taken by the Sustainability Executive Committee at least twice a year and comprises of senior leaders within the Nomad business.

In 2021 the Sustainability team took part in the Anti-Slavery Week Challenge, “Go the Distance” to mark Anti-Slavery day on the 18th October and raised money for the charity *Hope for Justice* which will be used to continue to provide support to victims of Modern Slavery across the world. Alongside this, the Sustainability team continued to raise awareness internally about Modern Slavery and gave an update on the progress we have been making in this area.


Responsibility and Effectiveness

Since the passing of the UK Modern Slavery Act in 2015, this is our fifth statement on compliance under this legislation. This is the first time Findus is reporting under the Norwegian Transparency Act (åpenhetsloven) 2022. In 2017, as a newly formed group, we took significant actions and in 2018, our approach and endeavours continued to be refined in the context of our enlarged group. In 2019 a new role, Ethical Compliance Manager, was created to focus on this area and take further actions. In 2020 and 2021, we continued to progress with our 'Ethical Roadmap' and assessing our supply chain despite the constraints of Covid 19.

For 2022 we expect that Covid-19 may continue to pose disruptions to our supply chain, but we are determined to continue driving progress on our Ethical Roadmap. We anticipate that a key part of this will be to draw on the recent availability of virtual assessments, which will enable us to continue our audit programme even if in-person travel is restricted.

We recognise the importance of maintaining constant vigilance to identify and address any impacts associated with modern 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 modern slavery and human trafficking on an annual basis.

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