

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 (“Nomad Foods”) is Europe’s leading frozen foods company, operating in different countries across Europe, 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 co-operation 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 suppliers of raw materials or services, 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 as 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.

By becoming a Supplier of Nomad Foods, you are stating that you meet or exceed our standards and that you and your own suppliers (throughout the whole supply chain) will comply with our Supplier Code of Conduct or an acceptable equivalent. We may revise and amend our Supplier Code of Conduct from time to time. Any updates and changes will apply once communicated to you.

2. Our Way of Working

(a) Legal Compliance

Suppliers shall comply with all applicable and relevant laws and regulations that govern their business operations and activities and shall have clear and effective guidelines and policies in place for their staff setting out business integrity expectations. Suppliers shall also comply with all of our policies, codes of practice and standards as applicable to them. Suppliers shall have adequate procedures in place to ensure that all confidential information of Nomad Foods, whether business or people related, is kept confidential and secure with limited access rights on a need-to-know basis and all applicable data privacy laws, in particular the EU General Data Protection Regulation, are complied with.

Suppliers shall have in place an Information Security Management System (ISMS) aligned with the requirement of the ISO 27001:2013 Standard. Suppliers shall also implement cyber security controls to protect against the most common cyber threats and demonstrate their commitment to cyber security by certifying against the requirements of the NCSC Cyber Essentials.

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

Suppliers shall comply with all applicable human rights laws and regulations 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 workers¹ 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, ensuring there is a process to raise and remediate grievances.
- Take all possible steps to prevent any instances of modern slavery and human trafficking, including indentured and bonded labour², and exploitation.
- Suppliers shall ensure that their staff can raise grievances and concerns without fear of retaliation.

(c) 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, as put in place by the UN, US, UK or the EU.
- Comply with Nomad Foods' Restricted Countries of Origin List for the whole supply chain of the material(s) supplied.
- Implement appropriate due diligence, screening and compliance procedures or practices in order to ensure compliance with the above obligations.

(d) Health and Safety

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

- Provide safe and healthy working conditions for their employees, and safe and healthy living quarters adjacent to factory premises when required by local law.

¹ 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.

² 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

- Designate the responsibility for health and safety to senior management.
- Have a health and 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.

(e) Fair Business Practices

Suppliers shall comply with all 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, shall not make facilitation payments and shall not give or accept improper gifts and hospitality.
- Operate in accordance with the principles of free enterprise and fair market competition.
- Have in place adequate policies, procedures, and practices to ensure compliance with these obligations.

Additional requirements for suppliers of food ingredients, finished food goods, primary or secondary packaging, transport, storage, and distribution services:

(f) Food Safety and Quality

Suppliers of food ingredients, finished food goods, primary or secondary packaging, transport, storage and distribution services shall:

- Comply with food safety law (178/2002/EU and 178/2002/EU Exit/UK retained legislation).
- Comply with nutrition data requirements codes of practice for raw materials and finished products.
- Comply with a given Global Food Safety Initiative (GFSI) standard as described in the [Annex](#).
 - Suppliers will be annually audited against this standard using an acceptable accreditation scheme, see [Annex](#). This independent review must achieve a minimum standard/grade as set out in the [Annex](#).
- Ensure that processes are fully risk assessed and any changes to or concerns about the safety or legality of a supplied material is communicated to and agreed by Nomad Foods prior to shipment.
- Communicate all risks associated with a supplied material at the point of purchase and in technical specifications. This is not limited to allergen presence or unintentional presence but includes foreign body risk, chemical risks, and other associated safety risks.
- All suppliers must have a food safety system which is based on HACCP principles as provided for under GFSI standards.
- All suppliers must have incident management procedures in place and this must stress tested at least once a year as per the GFSI standards.

(g) Environmental

Suppliers of food ingredients, finished food goods, primary or secondary packaging, transport, storage and distribution services shall comply with all applicable 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 has minimum negative impact on the planet or natural resources, and in particular:

- Manage water, energy, and other natural resources responsibly.
- Set or work towards setting science-based greenhouse gas emission reductions targets.
- Actively measure, reduce, and report emissions, carbon footprint, waste, and water.
- Conduct regular carbon footprint analysis or Life Cycle Assessment to understand the impact of their business on the environment and act as necessary.
- Protect, maintain, and work towards reversing impact on biodiversity, wildlife and endangered species as applicable to their industry.
- Show responsibility towards the communities in which they operate and manage community impact resulting from company and factory operations.

(h) Supply Chain Responsibility, Transparency and Traceability

Suppliers of food ingredients, finished food goods, primary or secondary packaging, transport, storage and distribution services shall map out their supply chain and be able to provide full details including name and description of the party, location and country of origin/manufacture of the product for both their supplier and their supplier's supplier(s) (if any) 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:

- Suppliers shall have or work towards a culture of continuous improvement.
- Suppliers shall, on request, register on the Sedex database³ as B Member and always keep such membership active during the period of supply, 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 against one of the described standards in the [Annex](#).
- If a Supplier is identified as a high risk or strategic supplier to Nomad Foods, the Supplier will be required to undertake an Ethical Trading Audit against one of the described standards in the [Annex](#). All costs for this will be borne by the Supplier.

³ For more information, please visit www.sedex.org.uk or www.sedexglobal.com and see the [Annex](#).

- Such audit shall be repeated every two (2) years and be completed by a recognised third-party audit company.
- The audit report, corrective action plan and any non-compliances shall be uploaded onto Sedex by the auditor.
- Any non-compliances identified will need to be closed and verified by the third-party audit company within the given timescales.

4. Consequences of Non-Compliance

Nomad Foods will work with its Suppliers to help them comply with this Supplier Code of Conduct and any subsequent updates to its [Annex](#) or associated documents such as Nomad Foods Restricted Countries of Origin List (as updated from time to time), recognising 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.

Without prejudice to its contractual rights, Nomad Foods reserves the right to delist Suppliers and cease buying products or services from Suppliers in case of material or repeat non-compliance with this Supplier Code of Conduct. Suppliers failing to meet our minimum standards may also be subject to improvement plans deemed acceptable to Nomad Foods, all costs for which will be borne by the Suppliers.

Suppliers shall have suitable procedures and processes in place ensuring that any non-compliance with this Supplier Code of Conduct is discovered and that Nomad Foods is notified of any non-compliance without delay. Suppliers shall pro-actively take corrective action as necessary.

Suppliers and their staff may also report actual or suspected breaches of this Supplier Code of Conduct confidentially and anonymously (where permitted by law) to Nomad Foods through our third party reporting hotline, Safecall, via telephone (+800 7233 2255 or +44 191 516 7749) or online, www.safecall.co.uk/reports.

Annex – Compliance and Accreditation

The Nomad Foods Supplier Code of Conduct sets out the main principles, standards and criteria that all Suppliers shall abide by. In addition, certain Suppliers will be asked to comply with additional requirements, technical standards or guidelines, These requirements only apply to the relevant subject matter and the applicable Supplier.

Failure to comply with any of the named standards, schemes or certifications will be deemed a material breach of contract and we reserve the right to terminate our contract with the Supplier.

We require all Suppliers to comply with the agreed supplied materials specifications as defined by Nomad Foods.

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.

We require all Suppliers to comply with the Nomad Foods standards, policies and codes of practice as applicable and as notified to the Supplier. These include:

Policies	Codes and Standards
<ul style="list-style-type: none"> • Policy on Food Allergens • Policy on Genetic Modification • Policy on Animal Product Sourcing • Policy on Fish and Seafood Sourcing • Policy on Packaging • Policy on Identity Preserved Materials Sourcing • Policy on Agriculture 	<ul style="list-style-type: none"> • Allergen Management • Allergen Management Part III – Gold Standard for Labelling • Global Allergen List • Restricted Countries of Origin List • Nutrition Data Requirement for Raw Materials and for Finished Products • Clean Labelling • Supplier delivery requirements • Responsible Packaging Design

These standards, policies and codes of practice may be changed and amended from time to time and additional documents and new requirements may be added. Any updates and changes will apply once communicated to the Supplier.

In addition, we require **all food operators, packaging materials suppliers, agents, brokers, transport, storage and distribution operators** to demonstrate compliance and accreditation as follows:

- Compliance with the Global Food Safety Initiative (GFSI) or equivalent standards. We recognise the following:
 - [British Retail Consortium \(BRC\) Global Standards](#)
 - [International Food Standard \(IFS\) Scheme](#)

- For these standards we accept a minimum standard of:
 - BRC Grade B
 - IFS Foundation
- For the following materials we expect compliance to chain of custody accreditation:
 - Fish & Seafood
 - [Marine Stewardship Council \(MSC\)](#)
 - [Aquaculture Stewardship Council \(ASC\)](#)
 - Palm oil
 - [Roundtable on Sustainable Palm Oil \(RSPO\)](#)
 - For our factories this must be a minimum standard of Fully Segregated RSPO
 - For Co-packers we accept a minimum of Mass Balance RSPO
 - Soy Bean
 - Must meet accepted non-deforestation standards
 - Must be non-Genetically Modified
 - Organic materials
 - EU directive (EU) 2018/848 or country equivalent standard
- If required to undertake a third-party Ethical Trading Audit, this must be done against one of the following standards:
 - [Sedex Members Ethical Trade Audit \(SMETA\)](#)
 - [Business Social Compliance Initiative \(BSCI\) Audit](#)
 - [Social Accountability 8000 \(SA 8000\) standard](#)
 - [Initiative Clause Sociale \(ICS\)](#)