Nomad Foods

2022
Impact Report

Serving the World with Better Food

Contents

About this Report

This is Nomad Foods' sixth annual Sustainability Report. It covers the calendar year from January to December 2022. This report covers all trading subsidiaries of Nomad Foods excluding the acquisition of its new business in the Adriatics in late 2021 (except where specified). The most recent previous report was published in April 2022. This report is influenced by the Global Reporting Initiative (GRI), and includes standards defined by the GRI guidelines. It meets the requirements of the EU Directive on Non-Financial Reporting

Introduction

CEO Foreword

In 2022, like many businesses around the world, we have been tested by a new set of operational challenges resulting from the wide-ranging impacts of the war in Ukraine.

This includes higher raw material costs and threats to business critical supplies. Our teams have worked incredibly hard to help us successfully navigate this volatile external environment. At the same time, we have taken great care to provide consumers with delicious, sustainably sourced and affordable products from across our portfolio of trusted brands. Always guided by our purpose of Serving the World with Better Food, which enables us to make the right decisions – for our business, people and the planet.

Our business is built around iconic fish and vegetable products that are not only convenient for consumers but also come with the unique benefits of frozen food, such as reduced food waste. Our brands invented the frozen category and have been at the heart of family life for generations. We want them to be favourites for generations to come and that's why building a business that is resilient for the long-term is our priority.

Put simply, we want to democratise sustainable eating and we do this by working proactively and collaboratively to deliver strong, sustainable financial performance to help us grow and by making an impact across the three key pillars of our "Appetite for a Better World" sustainability strategy:

- Better Sourcing,
- Better Nutrition,
- Better Operations

Better Sourcing
- Since co-founding the MSC (Marine Stewardship Council) over 25 years ago, Nomad Foods has led the way in protecting fish stocks for future generations. 98.9% of our fish and seafood is now certified as sustainably fished or responsibly farmed, putting us on track to achieve our goal of 100% by 2025.
- We are also on track to reach our target to source 100% of our vegetables, potatoes, fruit, and fresh herbs through sustainable farming practices by the end of 2025. In 2022, 90.8% of our suppliers achieved a score of silver or above on the Sustainable Agriculture Initiative Platform (SAI Platform) Farm Sustainability Assessment (FSA).

Better Nutrition
- Our nutrition team has done an outstanding job with 93.3% of our 2022 net sales coming from products classified as healthier meal choices (HMC) – well above the food industry average. This builds on a strong legacy of nutritional leadership that has resulted in a 100% Health and Nutrition score on the Dow Jones Sustainability Index for the 4th consecutive year (2019, 2020, 2021, 2022).

Better Operations
- In 2021, Nomad Foods announced plans to significantly reduce Greenhouse Gas (GHG) emissions in line with targets approved by the Science Based Targets initiative (SBTi).

- In 2022, we reduced the absolute emissions of our legacy business, prior to acquisitions, by 23.4% and our emissions intensity by 23.9% from a 2019 baseline. This is slightly ahead of our SBTi target trajectory for absolute emissions. 2022 was also the first full year that all our legacy sites ran on 100% renewable electricity.

There are of course a small number of areas where we have not progressed as quickly as we had hoped. One example is plastic where in 2022 96.5% of our packaging portfolio was recyclable, an increase of 6% over 2021. We have extended our target to have 100% of our consumer packaging recyclable from 2023 to 2030, due to technical challenges.

We have set clear timebound targets, aligned with the UN's Sustainable Development Goals and focused on areas that have the largest impact on our business, employees and the communities that we serve, and where we believe we can make a meaningful contribution to wider efforts to tackle the climate crisis. We could not do any of this without the support of our 8,000 employees, partnering, of course, with our suppliers and other key stakeholders, some of whom we have worked with for decades.

I am very proud of what our teams have achieved and look forward to keeping you updated on our progress.

Stéfan Descheemaeker,
CEO Nomad Foods

Nomad Foods at a Glance

Nomad Foods is Europe's leading frozen foods company, with a portfolio of iconic brands including Birds Eye, Findus, iglo, Aunt Bessie's, Goodfella's, La Cocinera, Ledo and Frikom.

Our product range covers fish and seafood, vegetables, plant-based foods, chicken and ready meal products, and our business strategy is underpinned by three pillars – to expand the category, grow our core products and accelerate innovation to align our business with consumer preferences and trends, including the increased demand for nutrient-packed, sustainably sourced and produced food. We seek to source, manufacture and sell our food to consumers in a responsible way and therefore our

€2.9bn
net revenues (including new acquisitions)

+7500
company employees (including new acquisitions)

actions are guided by our purpose – Serving the World with Better Food – and our sustainability strategy is embedded into our business planning processes and informed by perspectives from internal and external stakeholders.

Nomad Foods is headquartered in the United Kingdom. For more details on our ownership and legal form, major product categories and scale, see our 2022 annual report.

Our value chain includes the purchase of raw material, components, semi-finished goods and ready-made products. Purchased materials are transported to our production sites and warehouses for manufacturing. They are then distributed to local markets and sold mainly through large grocery retailers and foodservice providers to reach the end consumer.

In January 2021, Nomad Foods acquired Findus Switzerland, the leading frozen food brand in Switzerland with products across categories including fish, vegetables and ready meals. Unless highlighted otherwise, this business is included in all the sustainability information and data provided in this report. In some cases, notably 'Our Operations' we do continue to provide disaggregated figures for Findus Switzerland as well, to provide further contextual understanding.

In September 2021, Nomad Foods acquired Fortenova's Frozen Foods Business Group, with operations in Croatia, Serbia, Bosnia & Herzegovina, Hungary, Slovenia, Kosovo, North Macedonia and Montenegro. Its two anchor brands, Ledo and Frikom, offer a broad range of frozen food products including fish, fruits, vegetables, ready meals, pastry and ice cream. We are still in the process of onboarding and integrating this business, including work to assess the status

against our performance indicators. We provide data on the Greenhouse Gas emissions of this business, and for Nomad Foods as a whole (including all acquisitions) in this report. Other sustainability information and data for the Adriatics is not covered, though we have included updates and commentary in the different sections as applicable. Our ambition is to include all acquisitions once we have a full calendar year of data, or as soon as the initial mapping and integration allows.

Markets Where We Operate

HQ: Bedfont

● Nomad Foods' offices
● Nomad Foods' factories
● New markets

Our Purpose

As a leading European food company, we play an important role in the lives of our consumers. Our brands have been at the heart of family life for generations, and every day millions of households across Europe serve and eat the food we make.

This simple fact carries a responsibility with it, especially as we know the world is changing around us. We are determined to use our po-

sition in the marketplace to make a difference and our purpose, Serving the World with Better Food, acts as both a compass and a call to action. This means focusing on food that is great tasting, good for people and the planet, affordable and available everywhere.

Our purpose has been built on three principles: Better Food, Food for All and Appetite for a Better World.

Better Food
At the heart of what we all do every day is making the food we produce better; better for our consumers and better for the planet. Our focus is always on better taste and better nutrition, underpinned by the quality of our ingredients and recipes.

Food for All
We make products that are at the centre of everyday family mealtimes. They are affordable, available in retailers across Europe and in homes 24 hours a day, ready to cook at your pleasure. Our focus is on ease of use and our products can be prepared using a variety of cooking methods.

Appetite for a Better World
We are striving to transform the food system, working towards a future where food is produced respecting the health of people and planet. Our focus is on healthy and sustainability diets. What is good for me should also be good for the planet.

Our Brand Portfolio
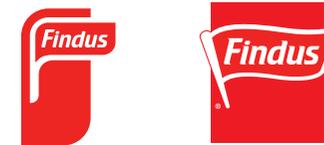
Risk and Resilience

Robust risk management processes are crucial to ensure we build a resilient and sustainable business.

We assess and monitor strategic, operational, financial, climate, and nature-related risks. Information on our risk factors is available in our 2022 annual report. Nomad Foods employs the common three-step risk management approach, by identifying actual or potential risks, assessing these risks, and taking action to accept, mitigate or eliminate the risks.

We operate a Sustainability Risk Heat Map listing current and emerging sustainability related risks. The Map is managed by the Ethical Compliance Manager who ensures it is reviewed with technical experts on a minimum quarterly basis. Once assessed, risks are given an overall risk exposure score and fed into the corporate risk register. The register is managed by our Corporate Risk Committee which meets quarterly and reports to the Executive Committee. Risks that are currently being monitored or acted on include climate related risks, deforestation, water scarcity, animal welfare, and eco-labelling. Sections of this report refer to some of the risks we are working to address. Our annual report also references certain sustainability and ESG related risks that could affect Nomad Foods, our supply chain or the food industry generally including environmental, social and health related concerns and the risk of not achieving our sustainability targets to the extent that we expect.

Our partnerships

Many of the sustainability challenges we face are systemic in nature and require wider collaboration to be address. Consequently, we participate actively in external initiatives and membership associations to increase the impact we have and to help us deliver our purpose and sustainability strategy. While we contribute to a much broader range of industry initiatives, our key partnerships are set out in the table below.

Table 1: Key Partnerships, Projects and Associations

Organisation	Objectives	Impact Area
Marine Stewardship Council	Promote and accelerate the global transition to sustainably sourced certified wild-capture fish and seafood	Sourcing: Fish and Seafood
Aquaculture Stewardship Council	Transform the world's seafood markets and promote the best environmental and social aquaculture performance	Sourcing: Fish and Seafood
Global Ghost Gear Initiative	Work across sectors to solve the problem of lost and abandoned fishing gear worldwide	Sourcing: Fish and Seafood
Sustainable Agriculture Initiative Platform	Create a sustainable, healthy and resilient agricultural sector whilst creating strong and secure supply chains	Sourcing: Crops
Roundtable on Sustainable Palm Oil	Transform markets to make sustainable palm oil the norm	Sourcing: Crops
Round Table on Responsible Soy	Promote the production, trade, and usage of responsible soy	Sourcing: Crops
Sedex	Manage and improve working conditions in global supply chains	Social Impact of Supply Chain
AIM European Brands Association	Create an environment of fair and vigorous competition for brands, fostering innovation and guaranteeing maximum value to consumers now and for generations to come	Responsible Marketing
Science-Based Targets Initiative	Lead the transition to a net-zero economy by setting emissions reduction targets grounded in climate science	Greenhouse Gas Emissions
10X20X30 Initiative	Halve food loss and waste in food supply chains by 2030	Waste
Forestry Stewardship Council	Promote responsible management of the world's forests	Packaging Lifecycle
Programme for the Endorsement of Forest Certification	Promote sustainable forest management through independent third-party certification	Packaging Lifecycle
Signatory to the EU Code of Conduct on Responsible Food Business and Marketing Practices	Contribute to a food environment that makes healthier and sustainable food choices easier	Better Sourcing Responsible Marketing GHG Emissions Water

Sustainability Strategy

To support the long-term growth of our business we need to support wider industry efforts to create a more resilient food system and a healthier, more sustainable future.

This puts sustainability firmly at the centre of our business and our brands. We also know that consumers, retailers and other stakeholders are increasingly asking for brands that are more sustainable and we are very proud that our brands are for the masses because that gives us an opportunity to make a huge difference. Put simply, we want to democratise sustainable eating and we do this by working proactively and collaboratively to deliver strong, sustainable financial performance to help us grow, and by making an impact across the three key pillars of our 'Appetite for a Better World' sustainability strategy:
• Better Sourcing
• Better Nutrition
• Better Operations

We also have a fourth section, 'solid foundations', which covers issues such as governance, resilience and risk that are fundamental to how we do business.

The strategy sets out our ambitions in each area, supported by timebound targets. It is linked to, and designed to help us deliver progress towards, the UN's Sustainable Development Goals.

In 2022, we launched a process to refresh and update our strategy, to reflect the ongoing changes to our business and the world around us. While the three pillars of our strategy remain unchanged, as they set out the three areas where we believe we can create the most impact on the world, we have elevated some of our existing commitments and created internal targets on areas including packaging plant-based food. We also renamed the strategy and platform as 'Appetite for a Better World', to link it directly into our purpose focus areas.

APPETITE FOR A BETTER WORLD

BETTER SOURCING
Our oceans
Our fields
Our ingredients

BETTER NUTRITION
Our nutritious food
Our approach to additives
Our influence

BETTER OPERATIONS
Our planet
Our people
Our community
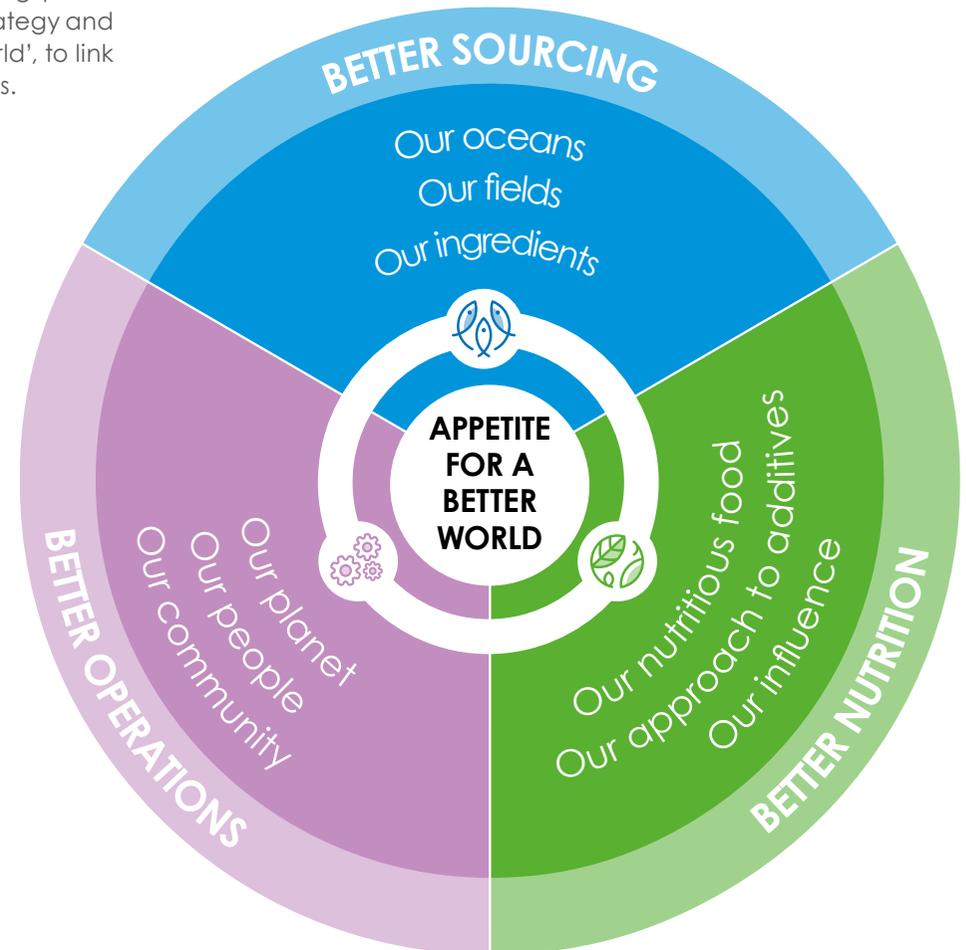
Approach to Materiality

The strategy refresh was also informed by the perspective of internal and external stakeholders, through our ongoing processes of engagement with them to ensure we have identified, and are acting on, the core issues material for our business.

See the table below for details of the stakeholders we engage with, the mechanisms we use and the focus of our discussions. This ensures we act on the social, environmental and governance issues that matter most to our stakeholders and which will impact on our long-term business success.

Our materiality process builds from the foundations provided by focused research we conducted in 2019. This included qualitative and quantitative research with consumers, employees, NGOs, retailers and suppliers. This work was refreshed in 2021, by drawing on multiple sources and processes to ensure the impact list was comprehensive and up-to-date, and through a workshop with a cross-functional set of senior internal stakeholders which started integrating a 'double materiality' approach. We assessed the relative importance of the issues in terms of the significance of our impact on the world, consid-

Table 2: Stakeholder Engagement Process

Stakeholder group	Engagement mechanisms	Focus of discussion
Investors	Calls with investors and investor relations firms	• Understand focus areas • Answer questions and explain strategy • Identify gaps
Customers	Calls, meetings and collaboration sessions with strategic global customers and multiple local customers	• Understand focus areas • Answer questions and explain strategy • Discuss learnings and outcomes • Collaborate on life cycle assessments (with selected customers) • Explore opportunities for joint projects and partnering
Suppliers	Strategic supplier meetings, supplier training and an annual supplier event	• Discuss areas of interest and focus • Upskill and explore specific areas • Explain the strategy and align on areas of shared interest
Farmers	Annual event/s per growing region	• Explain the strategy and align on areas of shared interest • Gain feedback on specific initiatives
Subject matter experts	'Future of' workshops with experts, webinars for employees, expert input on strategic positions and policy papers	• Challenge and future proof strategy • Build knowledge, understand concerns • Upskilling and horizon scanning

ering the scale, scope and likelihood of actual and potential impacts, both positive and negative. We also analysed the relative importance of the issues in terms of the degree to which they are likely to affect our business. This included a consideration of factors such as access to materials, costs, access to talent, reputational risk and loss of sales.

Further information on this process can be found on page 9 of our 2021 Sustainability Report.

We will review and update our materiality regularly, to ensure our understanding of material impacts continues to be up-to-date and comprehensive, to give us insight into emerging is-

sues and changing expectations, and to be in line with upcoming regulation.

The table below shows our current material impact assessment.

We provide further detail on these issues and what is covered under each of them in the section below.

The main areas where we have direct impact are vegetables grown by our contracted farmers; the transportation of raw materials between our sites; all processes that take place within our operating sites; communication with consumers through advertising; product labelling; and our Consumer Care Line. Direct suppliers are subject

to our policies, standards and product specifications and we select suppliers who reflect our high standards and agree to strict specifications.

Our impact is more limited in areas such as the primary production of raw materials; the processing of goods by third party suppliers; and the transportation of goods to and from retailers and other customers. We also have less direct influence over consumer transportation, preparation, and consumption of our products. Where possible, we do still seek to create positive change on relevant issues in these areas through industry associations, retailer partnerships and our networks.

Key Impact Areas

BETTER SOURCING	BETTER NUTRITION	BETTER OPERATIONS	SOLID FOUNDATIONS
Sourcing: fish and seafood ▶	Health and nutrition	Climate change and GHG emissions ◀▶	New taxes and regulation ◀
Sourcing: agriculture and other ingredients ▶	Responsible marketing	Operational water ▶	Corporate governance
Social impact of supply chain ▶		Packaging lifecycle	Resilience and risk
Animal welfare		Waste	ESG management and reporting
		Diversity, equity and inclusion ◀	Product safety and quality ▶
		Employee health, safety and wellbeing	

▶ *identified as a top priority for impact out.*　　◀ *identified as a top priority for impact in.*

Table 3: Issues covered in this report

Better Sourcing

Issue area	Overview	Key topics	Priority
Sourcing: fish and seafood	Measures to ensure sustainable fishing and responsible aquaculture along our value chain	Fish stocks, overfishing, bycatch, lost fishing equipment, minimising environmental impact, pollution, ocean ecosystems, traceability, certifications and standards, feed, water management	**Very high priority**
Sourcing: crops	Measures to ensure we source crops and other ingredients, including palm oil and soy, in a sustainable way	Biodiversity, species loss, deforestation, habitat destruction, land and soil quality, fertiliser use, regenerative agriculture, traceability, certification and standards, water management	**Very high priority**
Social impact of supply chain	Measures to ensure human rights are respected and that people are treated fairly throughout our supply chain	Human rights, child labour, modern slavery, supplier wellbeing, promoting community wellbeing, traceability, certification and standards	**Very high priority**
Sourcing: animal protein	Measures to monitor and manage the treatment and wellbeing of animals through the supply chain	Breeding, rearing, living conditions, antibiotics usage, transport, humane slaughter	**High priority**

Better Nutrition

Issue area	Overview	Key topics	Priority
Health and nutrition	Measures to encourage the production and promotion of nutritious products	Nutritional profile of food, additives/preservatives, artificial ingredients, sugar, fibre, salt, saturated fat, ultra-processing, nutritional signposting	**Highest priority**
Product safety and quality	Measures to ensure high standards of food safety and quality across all products	Product liability and standards, allergies	**Highest priority**
Additives	Measures to reduce the use of artificial ingredients across our portfolio	Clean labelling, ingredient selection, artificial ingredients, recipe improvements	**High priority**
Responsible Marketing	Measures to empower consumers to make informed, healthy and sustainable choices	Labelling, marketing towards children, shift towards sustainable nutritious products	**High priority**

Better Operations

Issue area	Overview	Key topics	Priority
Greenhouse gas emissions	Measures to reduce the greenhouse gas emissions associated with our business and supply chain	Impacts of climate change, operational GHG emissions, renewable energy, product carbon footprint	**Highest priority**
Diversity, equity and inclusion	Measures to attract, develop and retain diverse talent and build a diverse and inclusive business	Working culture, composition of workforce, inclusion, diversity	**Highest priority**
Employee health, safety and wellbeing	Measures to protect employees' physical and mental health and create a safe working environment	Health and safety, human capital development, advancement, employee wellbeing, labour management	**Highest priority**

Better Operations

Issue area	Overview	Key topics	Priority
Operational water	Measures to ensure the responsible withdrawal, consumption and discharge of water	Water use, stress and pollution, flooding	**Very high priority**
Packaging lifecycle	Measures to minimise the environmental impacts of packaging	Recycled material, recyclability, circularity, light-weighting, secondary/tertiary packaging, design	**High priority**
Waste	Measures to reduce waste consumption and promote better management of waste materials	Food waste, waste management	**High priority**

Solid Foundations

Issue area	Overview	Key topics	Priority
New taxes and regulation	Measures to respond to a changing regulatory environment, including approach to taxation	Regulatory compliance, taxes and sanctions	**Very high priority**
Governance	Measures to ensure clear, comprehensive and ethical governance processes, including governance of ESG issues, upholding transparent reporting standards	Corruption & bribery, lobbying, tax, anti-competitive behaviour, executive pay and governance, ESG and sustainability governance, integration of sustainability into the business, sustainability audits and standards	**High priority**
Resilience and risk	Measures to analyse, mitigate and respond to risks	Risk analysis and reporting, risk mitigation and financial evaluation of risks	**High priority**

Our Sustainability Reporting

Nomad Foods is committed to providing stakeholders with up-to-date performance information.

We publish this annual report to provide an update on progress against our sustainability strategy, targets and key performance indicators.

Targets and Progress

In 2022, we made good progress against our commitments. As the adjacent table shows, we are either ahead of or on track on the majority of our targets, with particularly strong progress on both our fish and seafood, nutrition and our agriculture targets. The progress on artificial additives and packaging does reflect the extension we have made to the timelines for these, but we are still pleased with the progress we are making. We are slightly behind on our emissions intensity target for our legacy business, though we are pleased to report that we are slightly ahead when it comes to the reduction in our absolute emissions. It is however important to note that the acquisition of our new businesses has increased our footprint, as detailed in the GHG emissions section.

Nomad Foods is also included in the Dow Jones Sustainability Europe Index (DJSI Europe) as the second highest ranking company in Europe within the food product industry group.

Table 4: Progress on commitments

Pillar	Target	2021	Status
Better Sourcing	100% fish and seafood from sustainable fishing or responsible farming by the end of 2025	98.9%	**Slightly ahead**
	100% of our vegetables from sustainable farming practices by the end of 2025	90.8%	**Ahead**
Better Nutrition	Grow sales from Healthier Meal Choices year on year	93.3%	**On track**
	100% of our portfolio to be without taste enhancers, artificial flavours and artificial colourants by 2023*	99%	**On track**
Better Operations	Reduce our greenhouse gas emissions intensity across our operations by 45% from a 2019 baseline**	-23.9%	**Slightly behind**
	100% of our consumer packaging will be recyclable by the end of 2030***	96.5%	**On track**

* This target was previously for 2022 but has been extended to 2023 to give us time to work with new acquisitions
** This reflects the reduction in emissions intensity for the Nomad Foods legacy business, as this is the business for which the target was set and which we have reported on in previous years. It does not include data from our new acquisitions: Findus Switzerland and our Adriatics business. This data is included in the GHG Emissions section of the report.
*** This target was previously 2022 but has been extended to 2030 due to technical challenges

Sustainable Development Goals

Table 5: Our progress towards the UN Sustainable Development Goals
We align our strategic pillars and commitments with UN Sustainable Development Goals and specific targets to catalyse further change.

Sustainability Priorities	SDG	SDG sub-targets	Targets	Results	Further Information
Better Sourcing	ZERO HUNGER (2); RESPONSIBLE CONSUMPTION AND PRODUCTION (12); LIFE BELOW WATER (14); LIFE ON LAND (15)	2.4, 2.5 12.2 14.1, 14.4 15.2, 15.5	1. We will use 100% fish and seafood from sustainable fishing and responsible farming by the end of 2025 2. 100% of our vegetables and potatoes will be produced using sustainable farming practices by the end of 2025	98.9% of fish and seafood is sourced from sustainable fishing and responsible farming 90% of our vegetables and potatoes are produced using sustainable farming practices	see page 17.
Better Nutrition	ZERO HUNGER (2)	2.1	3. We will grow the healthier meal choices in our portfolio every year 4. 100% of our portfolio to be without flavour enhancers, artificial flavours and artificial colourants by the end of 2023*	93.3% of our total net sales are from healthier meal choices 99% of our portfolio is without flavour enhancers, artificial flavours and artificial colourants	see page 27.
Better Operations	RESPONSIBLE CONSUMPTION AND PRODUCTION (12)	12.3, 12.4, 12.5	5. We will reduce our greenhouse gas emissions intensity across our operations by 45% from a 2019 baseline** 6. 100% of our consumer packaging will be recyclable by the end of 2025***	We have reduced our greenhouse gas emissions intensity across our operations by 23.9% from a 2019 baseline 96.5% of our consumer packaging is recyclable	see page 35.
Partnerships	PARTNERSHIPS FOR THE GOALS (17)	17.7	n/a	We participate actively in external initiatives and membership associations to increase our impact.	see page 7.

This target was previously for 2022 but has been extended to 2023 to give us time to work with new acquisitions
*** This reflects the reduction in emissions intensity for the Nomad Foods legacy business, as this is the business for which the target was set and which we have reported on in previous years. It does not include data from our new acquisitions: Findus Switzerland and our Adriatics business. This data is included in the GHG Emissions section of the report.*
**** This target was previously 2022 but has been extended to 2030 due to technical challenges*

Governance

Strong governance is essential for achieving our sustainability targets.

Failure to act fairly, honestly and lawfully would also carry significant risks for our business including but not exclusively related to long-term reputational damage; loss of shareholder and consumer trust; fines; legal action against Nomad Foods; and negative impacts on our supply chain and on our access to third party financing.

Details of our governance structure, board composition, board independence, taxation and taxation risks, executive pay, conflicts of interest, compliance, and workforce governance can be found in our 2022 annual report.

We have a three-stage approach to governance. Internal Subject Matter Experts are responsible for drafting policies. Policies are then approved by our Policy Review Group, made up of senior representatives, including Executive Committee members, from Legal, HR, Internal Audit and Corporate Affairs. The policies are supported by additional guidance documents, such as codes of practice and procedures. We also have a range of proactive monitoring programmes in place to ensure they are followed. Further details of policies, supporting documents and processes for monitoring and assuring compliance are provided in the relevant sections of this report.

Sustainability Governance

Our Group Director of Corporate Affairs & Sustainability is responsible for the day-to-day oversight and management of our sustainability strategy and reports directly to our CEO.

An update and overview on sustainability is provided to our Executive Committee on a quarterly basis with additional meetings for specific projects or decisions set up as necessary. Sustainability is also embedded into key business processes, such as our innovation model, new product assessments (which apply strict nutritional criteria) and other decision-making forums. We also have an external Nomad Foods Sustainability Advisory Board which provides an independent perspective on our strategy and progress and meets at least annually.

Policies and Approach

Our governance approach is underpinned by two codes: our Code of Business Principles and our Supplier Code of Conduct.

Our Code of Business Principles sets out our commitment to act fairly, ethically and in line with our purpose. The Code applies to all Nomad Foods employees, part-time and permanent, as well as the Executive Committee and the Board of Directors.

Our Supplier Code of Conduct sets out the standards we expect from all suppliers of Nomad Foods, whether raw material suppliers, service providers, co-packers, contractors or agents.

These codes are supported by a set of public and internal policies. All material ESG areas are covered in one or more business policies, which are described in the relevant sections in this report. Specific policies to ensure ethical and lawful governance practices include:

Assurance approach

Setting requirements
- Policy
- Code of Practice
- Procedure
- Commitments and Targets

Monitoring compliance
- Specifications
- Questionnaires
- Information gathering

Assuring compliance
- Audits
- Certifications

The Role of Nomad Foods' Sustainability Governance

- Identify and manage Nomad Foods' material environmental and social sustainability impact areas
- Maintain good corporate governance and embed sustainability within Nomad Foods' wider corporate strategy
- Approve sustainability targets and commitments, and monitor their implementation and progress
- Ensure effective mitigation of material sustainability risks

- Anti-Bribery and Corruption Policy: this policy applies to all Nomad Foods colleagues, including any contractors working on our behalf. It sets out our zero-tolerance approach to bribery and corruption and our key principles for upholding this. These include never giving or accepting valuable items that might confer an improper business advantage, avoiding situations that could create the impression of bribery, and reporting any suspicions of bribery and corruption through our reporting process.
- Competition and Anti-Trust Policy: this policy sets out our commitment to fair competition and to protect consumers by following all applicable competition laws and regulations.
- Whistleblowing Policy: this policy provides our employees with guidance on how to report suspected wrongdoing. It also emphasises that employees should feel safe to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

We also have a Gifts and Hospitality Policy and a Conflicts of Interest Policy. Our Group Tax Strategy sets out our policy and approach to conducting tax affairs and dealing with tax risk. We disclose lobbying in line with relevant government regulations on public websites.

We have a range of control procedures to ensure that these codes and policies are being followed. Compliance on topics that are material to our sustainability agenda is reported annually in our sustainability report.

We have a strict governance model for assessing all new products in all markets according to our high nutritional, environmental and ethical standards. Products that do not comply are automatically flagged by the system and brought to the central decision forum to be discussed. Approval to launch might still be given provided certain criteria are fulfilled.

We train all Nomad Foods employees on corruption and bribery, and ensure that all employees, especially those involved in Sales, Marketing, Procurement or other commercial functions, are made familiar with applicable competition laws.
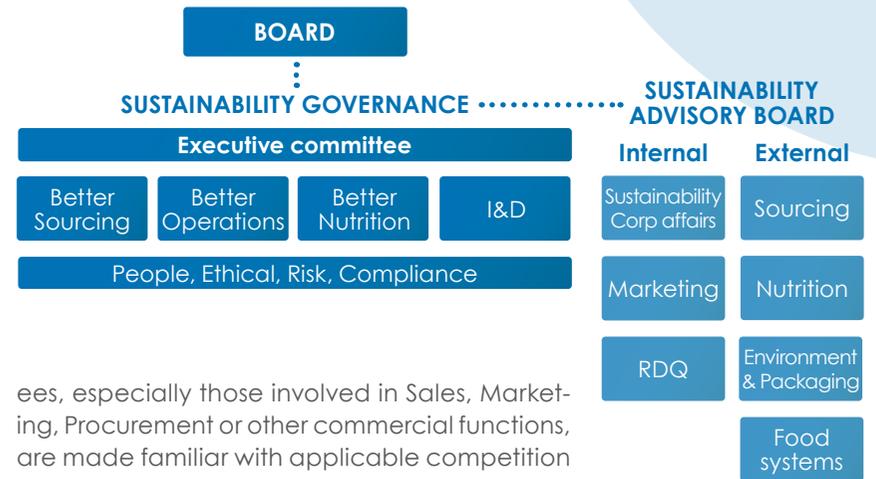
With regard to corruption, we have enhanced risk-management controls in place around certain higher-risk functions. These include operating transparent and clearly documented hiring processes and prohibiting any payments to politicians or political parties. In our supply chain, we review compliance through annual supplier questionnaires as well as risk-based audits. We also request that suppliers confirm compliance with our Supplier Code of Conduct and follow up on any non-compliances.

We operate a reporting line – Safecall – for employees and externals to share any concerns about misconduct. This is run by an independent third party and gives the option to speak out anonymously.

BOARD

SUSTAINABILITY GOVERNANCE .... **SUSTAINABILITY ADVISORY BOARD**

Executive committee

| Better Sourcing | Better Operations | Better Nutrition | I&D |

People, Ethical, Risk, Compliance

Internal
- Sustainability Corp affairs
- Marketing
- RDQ

External
- Sourcing
- Nutrition
- Environment & Packaging
- Food systems

Better sourcing
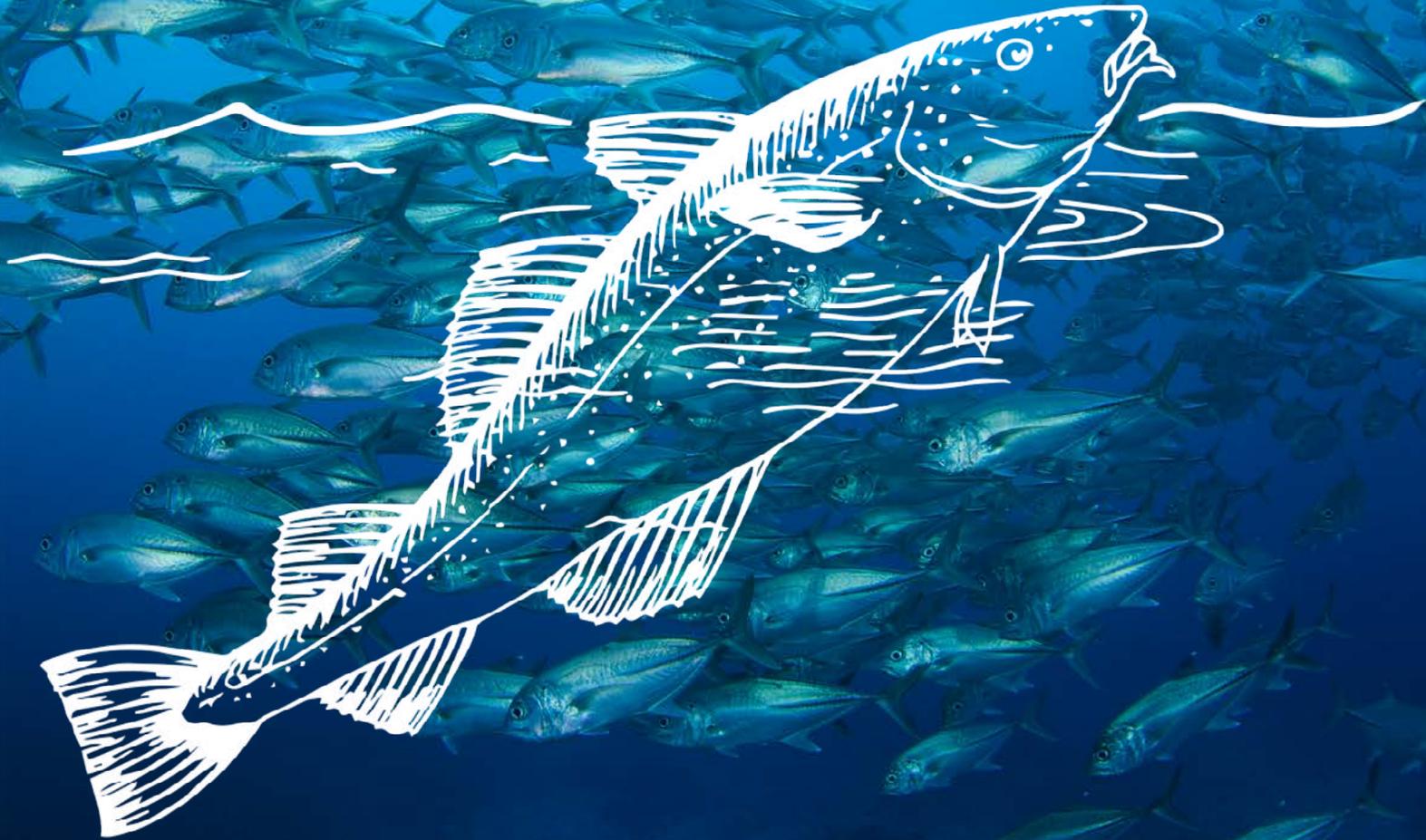
Fish and Seafood

Overfishing poses enormous risks to current and future fish stocks, ecosystems, and communities.

The United Nations Food and Agricultural Organisation (FAO) estimates that over a third of global fisheries have been fished beyond sustainable limits. Further damage is being done by careless fishing practices, including avoidable bycatch of non-target species and fishing equipment left in the ocean (known as Ghost Gear), which is a significant contributor to plastic pollution. Seafood supply chains are also at risk of a range of human rights abuses, including modern slavery. Overfishing risks are compounded by the negative consequences of climate change, including rising sea temperatures and acidification. These pose a risk to seafood supply chains, including our own.

Policies and Approach

Our policy on Fish and Seafood Sourcing stipulates that we only source from suppliers that comply with either the FAO Code of Conduct for Responsible Fisheries or the FAO Technical Guidelines for Aquaculture. We work actively with our suppliers to exclude any illegal, unregulated or unreported (IUU) wild capture fish from any of our markets, or fish stocks that are depleted or recovering. We are committed to sourcing 100% of our fish and seafood from sustainable fishing or responsible farming by the end of 2025.

We use independent third-party certification schemes with full end-to-end oversight to validate the sustainable fish and seafood sourcing credentials of our supply chain. All parties involved across our supply chain must be certified annually against the schemes' standard. In particular, we work closely with the Marine Stewardship Council (MSC) and the Aquaculture Stewardship Council (ASC). The MSC covers wild capture fisheries, while the ASC covers aquaculture practices for farmed fish and seafood. Certification for both schemes is carried out by the independent accreditation body, Assurance Services International (ASI).

We have dedicated initiatives to increase transparency and minimise our impact on ocean ecosystems and have been members of the Global Ghost Gear Initiative since 2020. Our Captain's Fish Finder tool (launched in 2010) also allows consumers in some markets to see the specific geographic regions we source fish and seafood from.

Progress

In 2022, 98.9% of our sourced fish and seafood volume was MSC- or ASC- certified, an increase of 0.9 percentage point from 2021. This was in part due to improvements in our Belgian, Portuguese and Finnish markets, with 100% of the fish and seafood products in our iglo Belgium, iglo Portugal and Findus Finland portfolios now certified by the MSC or ASC. As a result, farmed fish and seafood products are now 100% ASC-certified in ten of our markets, and wild capture products are 100% MSC-certified in eight markets.

We remain the largest branded producer of MSC-certified and labelled fish and seafood globally, with 96.5% of our wild capture fish and seafood certified and labelled.

In 2022, as part of our fish diversification strategy,

Target	Indicator	2020	2021	2022
100% by 2025	% Purchased fish and seafood volume that is MSC- or ASC- certified	96	98	98.9
	% Purchased wild capture fish and seafood volume that is MSC-certified	97	98	99.0
	% Purchased farmed fish and seafood volume that is ASC-certified	82	96	95.5
	% Nomad Foods sale volume that is MSC or ASC labelled	95	95.5	96.5
	Number of MSC- or ASC- certified products across our global portfolio	834	883*	940

*The total number of MSC- or ASC- certified products across our global portfolio in 2021, including Findus Switzerland, was 929. This figure shows that 11 more products were MSC- or ASC- certified in 2022.

> **"We are the largest adopter of the MSC Ecolabel, with 99.0% of our wild capture fish and seafood coming from certified fisheries. The MSC's Fisheries Standard ensures that fish stocks, environmental impacts, and management are all maintained at sustainable levels. MSC certified fisheries also continue to invest in further improvements year after year**
> Oliver Spring, Group Sustainability Manager

we increased the proportion of our sales volume that is farmed fish and seafood from 1.77% to 2.06%. In 2022, we were also part of the Sustainable Fisheries Partnership's (SFP) Global Squid Supply Chain Roundtable which focuses on engaging supply chains to launch and implement improvement initiatives, including the certification of squid fisheries, to support their long-term sustainability.

Future Plans

Our goal is to continue to increase the proportion of our fish and seafood from MSC- or ASC-certified sources and our UK and Ireland portfolios are on track to become 100% MSC- and ASC- certified in 2023.

We will also continue to progress in line with our fish diversification strategy (see fish diversification case study) in 2023.

Responsible sourcing standards

MSC Standard

The MSC Fisheries Standard is the leading international standard for sustainable fishing and is used to assess if fisheries are well-managed and environmentally sustainable. The Standard has been independently benchmarked for its credibility. It is the most rigorous form of certification currently available and reflects the most up-to-date understanding of internationally accepted fisheries science and management. It is regularly and openly reviewed by scientists and other stakeholders to account for new knowledge and developments. The latest version of the Standard (version 3.0) was launched in May 2023, following the most comprehensive review to date.

The MSC label is only applied to wild fish or seafood from fisheries that have been certified to the MSC Standard. To become certified, fisheries must comply with requirements across three principles:

Principle 1: Sustainable target fish stocks
- Fishing operations must be conducted in a manner that ensures healthy fish stocks now and in the future, and does not lead to over-fishing or unsustainable depletion of populations.
- Where populations have been depleted, fishing operations must be conducted in a manner that demonstrably leads to their recovery, ensuring operations can continue indefinitely.

Principle 2: Environmental impact of fishing
- Fishing operations should support the structure, productivity, function and diversity of the ecosystem on which the fishery depends.
- This includes measures such as minimising bycatch, ensuring endangered, threatened and protected species are not negatively affected, ensuring all involved habitats remain healthy and minimising potential loss of fishing gear.

Principle 3: Effective management
- Fisheries must have effective management systems that respect local, national and international laws and standards, and incorporate frameworks that ensure responsible and sustainable operations.
- This includes establishing harvest management strategies, avoiding any Illegal, Unregulated & Unreported (IUU) fishing, conducting regular risk assessments, and having robust compliance systems in place.

ASC Standard

The ASC Standard includes criteria to minimise environmental and social impacts in the following areas of aquaculture:
- Legal compliance (ensuring farmers obey the law and have the legal right to be there)
- Preservation of the natural environment and biodiversity
- Preservation of water resources and water quality
- Preservation of diversity of species and wild populations (e.g., preventing escapes which could pose a threat to wild fish)
- Responsible use and sourcing of animal feed and other resources
- Good animal health and husbandry (e.g., preventing unnecessary antibiotic and chemical use)
- Social responsibility (e.g., preventing child labour and ensuring health and safety of workers, freedom of assembly, and positive community relations)

The MSC and ASC Chain of Custody Standard ensures that MSC/ASC labelled products have been sourced from a certified fishery/farm, through a certified supply chain. For products to carry the MSC/ASC label, every company in the supply chain must have a valid Chain of Custody certificate.

Deep Dive: Fish diversification strategy

We are committed to sourcing 100% of our fish and seafood from sustainable fishing or responsible farming sources by the end of 2025. More than a third of global fish stocks are currently being fished at unsustainable levels and wild caught fishing volumes are set to decline, and so, to ensure we have enough sustainable fish to meet future demand we are accelerating our fish diversification strategy which is focused on three key areas:

- **Continuing to source wild caught fish to the Marine Stewardship Council (MSC) standard.** We are the world's largest branded purchaser of Marine Stewardship Certified white fish and therefore we recognise the role we have to play in protecting these vital ecosystems. We co-founded the Marine Stewardship Council and have worked with MSC for 25 years to source certified wild fish.
- **Increasing the range of species in our portfolio, including additional sources of responsibly sourced farmed fish**, working in partnership with the Aquaculture Stewardship Council (ASC). For example, in October 2022 we announced new contracts for ASC-certified pangasius from three of the largest ASC certified suppliers globally.
- **Exploring innovation partnerships aimed at developing and scaling emerging food technologies** in areas including cell-cultured seafood (through our partnership with BlueNalu) and alternative proteins such as bivalves (clams, mussels, etc) through a partnership with scientists from the University of Cambridge.

"
We are really pleased with Nomad Foods' increased commitment to support sustainable aquaculture practices by incorporating more ASC-certified farmed fish into their product range. This is an important sign that environmentally sustainable and socially responsible production are key requirements for the aquaculture industry. We look forward to working more closely in the future.

Chris Ninnes, Chief Executive Officer, ASC

Crops

Food businesses today must provide nutritious food while protecting natural resources, ecosystems, biodiversity, soil quality, and the communities and workers connected to the agricultural system.

There is also a need to mitigate and manage the negative impacts climate change and biodiversity loss are already having on the food system, which can have significant impacts on farmer livelihoods.

Special care needs to be given to crops such as palm oil and soy which pose particular environmental risks, including deforestation of native forests, biodiversity loss and habitat destruction.

Policies and Approach

We have a target to source 100% of our vegetables, potatoes, fruit and fresh herbs through sustainable farming practices by the end of 2025. Our Agriculture Policy, and supporting documents, cover the economic, environmental and social impacts of our agricultural practices. They also set out our commitment to the responsible use of pesticides and fertilisers and ensure that we do not use genetically modified ingredients in our products.

Over half of our vegetables, potatoes, and fresh herbs are sourced from farmers with whom we have a direct relationship and a long-term contract. This totals approximately 700 farmers. The remainder are sourced from trusted third-party suppliers. Ingredients covered by topic-specific sustainability schemes, such as palm oil or soy, are not covered in this scope, but we have separate certification targets for these commodities (see box).

The Sustainable Agriculture Initiative

We joined the Sustainable Agriculture Initiative Platform (SAI Platform) in 2018. We use the SAI Platform's Farm Sustainability Assessment (FSA) to measure our suppliers' and farmers' progress towards our target. The FSA framework covers ten fundamental components of sustainable agriculture, including soil management, water management, air quality and greenhouse gas emissions, biodiversity and labour conditions. Farms or farm management groups are awarded bronze, silver or gold depending on which threshold of requirements are met. To meet these requirements, suppliers must be externally verified either through a benchmarked assurance scheme or an independent FSA verification audit. Within our 100% 'sustainable farming practices' target, we require minimum silver FSA verification.

Our FSA project team is responsible for driving progress towards our target. This is a cross-functional team including representatives from Sustainability, Research and Development, Data Management, Supplier Assurance, Procurement, Agriculture and Marketing. The team meets once a month to track progress and identify action priorities. Our Field team of agricultural experts work closely with our direct growers to deliver continuous improvement.

Target	Indicator	2020**	2021	2022
100% by 2025	% Vegetables produced using sustainable farming practices*	77	88	90.8
100%	% Purchased volume of palm oil for in-house production RSPO-Certified segregated	99	100	99.4
100%	% Purchased volume of soy that is 'responsible' as per policy	12	17	24

*Defined as contracted suppliers that achieved FSA silver level, and bulk & co-pack that achieved FSA silver level after self-assessment
**2020 data reflects only volumes purchased for in-house production

Nomad Foods' Agricultural Purpose and Ambition (NAPA) Framework

Our NAPA Framework, launched in 2021, sets out how we work with our contracted growers to create a more sustainable and resilient agricultural supply chain, in line with our Agriculture Policy. Through the framework activities, we provide growers with guidance on what we want to work with them to achieve, which is updated annually to account for any internal and external developments. We also run on-farm pilot projects relating to key areas such as biodiversity, soil management and water management, which enable us to trial new technology and agricultural methods and provide baseline data to inform target development. Data from these trials also inform best practice guides, driving continual improvement. For more information on the NAPA framework, see p.21 of our 2021 Sustainability Report.

Beyond policies and practices, we have specific initiatives to support biodiversity and carbon reduction, and we run pilot projects on regenerative agriculture. We are part of the SAI Platform's FSA Community and sit on the Crops Working Group (CWG). In 2022, as part of the CWG, we joined the workstream on Climate Smart Agriculture. The aim of this workstream is to develop an aligned approach for measurable GHG emissions mitigation and resilience building across agriculture.

Progress

We are making strong progress towards sourcing 100% of our vegetables, potatoes, fruit, and fresh herbs through sustainable farming practices by the end of 2025. In 2022, 90.8% of suppliers are FSA silver or above, an increase of 2.8% vs 2021. We also independently assured our performance figures for 2020, 2021 and 2022.

In 2022, we included Findus Switzerland suppliers in our programme and reported performance. Work is still underway to build visibility of the schemes and standards used by suppliers within this part of the business. Consequently, progress has been slower than hoped and therefore we reported all of these suppliers as not meeting FSA silver until full visibility is achieved.

As part of our NAPA Framework, we ran several farm pilot projects in 2022. In Italy, we installed weather stations with soil moisture sensors at two farms to provide accurate data on precipitation and soil moisture, providing greater insight on the optimal time for irrigation. Within Germany, we trialed new precision farming technology, using a robot to apply herbicide directly to weeds alone and completely remove weeds from a field using 95% less agrochemicals than previously. Given the success of these pilots, we are exploring how we can scale to reduce water consumption, and the use of herbicides and pesticides across our wider supply chain.

Finding solutions to the "triple challenge" of feeding a growing global population, while tackling the climate crisis and reversing biodiversity loss remains a key priority for us and we continued our work to find ways to address this challenge. This included continued work on Project Echo, a set of initiatives which we launched in 2021 to raise the bar on sustainable agriculture.

Supporting biodiversity is central to addressing the 'triple challenge' and we continue to make good progress. For example, we launched a new campaign in the UK to highlight the link

between biodiversity and the food chain. The 'Peas for Bees' campaign communicated the work Birds Eye is doing on biodiversity. The campaign, which was one of the largest ever to date for Birds Eye, ran across multiple channels, including TV and included an on-pack promotion across the Birds Eye Garden Peas and Petits Pois ranges, which gave shoppers the chance to win seed boxes, and support biodiversity in their own green spaces. In addition, 5,000 seed boxes were donated to local Hull schools near to where our peas are grown and 3,000 seed boxes were donated to local schools via an internal employee competition.

We have also been exploring how regenerative agriculture principles can be applied to Nomad Foods' direct growers and aim to complete this work by August 2023.

Future plans

Our priority for 2023 will be continuing to work towards achieving our 100% FSA silver or above commitment for our vegetable suppliers supporting our suppliers through the process.

Given the recent acquisition of Findus Switzerland, we will complete a full mapping of the FSA status of their suppliers, enabling us to set and implement plans to achieve our FSA target by 2025.

Finally, as part of our Scienced Based Targets Initiative (SBTI) commitment of becoming net zero, we will continue to engage our top 75% of suppliers by absolute emissions to set their own Science Based Targets. This will also include the creation of a carbon reduction strategy across our direct grower base and developing our Forest, Land and Agriculture (FLAG) targets.

> *We are committed to finding solutions that feed the planet, tackle the climate crisis, and reverse biodiversity loss. From trialling new precision farming technology that reduces agrochemical use, to educating consumers on what they can do to protect biodiversity, we continued to look for ways to address this challenge in 2022.*

Julie Burton, Head of Agricultural Strategy – Sustainability & Welfare

High Risk Ingredients

We have specific policies governing our use of ingredients at high risk of causing deforestation. Our Soy Policy sets out our commitment to work towards using responsibly sourced soy across our supply chain. It covers all brands and soy used to produce our products, whether directly as an ingredient or indirectly through feed. We commit to verifying that the soy in our supply chain is neither from legally nor illegally deforested land and is sourced from relevant certification schemes wherever possible. Where this is not yet possible, we compensate through the Roundtable on Responsible Soy credit scheme. In 2022, we purchased RTRS credits to compensate for the volumes of soy that were not yet 100% sustainably certified.

In 2022, 24% of our purchased soy was responsibly sourced as per our policy, an increase of 7% from 2021. We also carried out a new wave of our soy mapping exercise and received double the response rate from suppliers as compared to 2021.

Our Palm Oil Policy states that we will only purchase palm oil from Roundtable for Sustainable Palm Oil (RSPO) Segregated certified sources, meaning it can be traced back to RSPO-certified mills. In 2022, we sourced 99.4% RSPO-Certified segregated palm oil for in-house production, a decrease from 100% in 2021. This reduction was due to the war in Ukraine resulting in shortages of sunflower oil. Consequently, we increased the sourcing of palm oil to compensate and where suppliers were unable to source RSPO SG certified palm oil, we accepted RSPO Mass Balance.

Animal Protein

Sourcing animal protein responsibly is important for animal and human wellbeing.

Consumers expect transparency and high standards. Legislation, retailer standards, and codes of practice are also placing increased focus on animal welfare. Major risks associated with failing to source animal protein responsibly include poor animal welfare standards such as inhumane living conditions, and prophylactic use of antibiotics on healthy animals, which may also pose a risk to human health.

Policies and Approach
Fish and seafood is the largest animal protein source in our portfolio and is covered by specific policies and procedures (see Sourcing: Fish and Seafood). Our Policy on Animal Product Sourcing sets out our approach to sourcing other animal products, including meat (beef, lamb, pork, chicken), dairy products, and eggs. The policy covers all Nomad Foods products and brands, and our suppliers are required to comply with it. It ensures that all animals used for meat production are humanely slaughtered. It also states that Nomad Foods does not permit the use of antibiotics deemed critically important to human health (CIAs as determined by The World Health Organisation), prophylactic or growth-promoting antibiotics, or hormones in any animal protein products. Regarding eggs or products derived from eggs (which represent less than 1% of our portfolio) the policy stipulates they must be sourced from barn-reared animals as a minimum.

Wherever we operate, all suppliers to Nomad Foods meet national legal requirements on animal welfare. We support the Animal Welfare Committee's (AWC) 'Five Freedoms of Animal Welfare'.

1. Freedom from hunger and thirst
2. Freedom from discomfort
3. Freedom from pain, injury or disease
4. Freedom to express normal behaviour
5. Freedom from fear and distress

We are also signatories of the Better Chicken Commitment (BCC) and are committed to working to improve welfare standards by 2026. This set of standards to ensure the welfare of broiler chickens, was developed by animal welfare and animal rights organisations from across Europe, and significantly exceeds regulatory minimums for animal welfare.

We carry out an annual questionnaire with our suppliers to understand their welfare standards. In 2022, we doubled the number of questions within the questionnaire to gain greater insight into the wider areas affecting animal welfare and sustainability, such as ingredient composition, country of origin of feed, and where applicable, the total time and number of stops from supply to delivery at Nomad Foods.

Progress
Due to significant supply chain disruptions over the last few years, many businesses, including ours, have had to focus on securing supply, sometimes leading to slower progress in other areas. Despite this, we have managed to move towards higher welfare standards in certain ar-

Indicator	2020	2021	2022
Purchased volume of poultry from non-cage reared chickens (%)	100	100	100
Percentage of egg volume from non-cage reared chickens (%)	92	100	100
Total purchased volume of animals by breed type (tons)	146,167.5	146,654	137,538
% Purchased volume that is fish and seafood	73.7	74.2	73.3
% Purchased volume that is poultry	16.8	17	17.5
% Purchased volume that is red meat	9.6	8.8	9.2

eas such as enrichment.

Results of our 2022 questionnaire* show that 100% of the chicken we source is compliant with EU welfare laws and regulations. All birds are stunned before slaughter, we are 100% cage-free, and no suppliers use prophylactics or growth promoting antibiotics.

We continue to work with our suppliers to improve opportunities for chickens to express natural behaviours, as well as extending access to natural daylight. As of 2022, over 60% of our suppliers provide all or some of their poultry stocks with access to enrichment, over half provide natural daylight to all their poultry stocks, and another 36% provide natural daylight to some of their stocks. These results represent an increase from 2021. In 2022, we also saw further improvements in stocking density and travel time to slaughter, with a quarter of suppliers stocking birds at 30kg/m2 or less, meeting BCC criteria,

*Data reflects the percentage of suppliers supplying Nomad Foods, not the percentage of purchased volume of animals. In 2022, we had a 100% response rate, up from 80% in 2021. Where full transparency was not available from suppliers, we have assumed non-compliance, even if they have previously shown compliance.

> "Despite a challenging year due to supply chain disruptions, we remain committed to improving the welfare standards for the animal protein products we source. By working closely with our suppliers, we continue to deliver year-on-year improvements.
>
> Imogen English, Group Sustainability Manager - Agriculture

and nearly 70% having a travel time for their birds of 8 hours or less.

We also continue to increase the transparency of our supply chain. In 2022, more than 95% of our cheddar cheese was sourced from suppliers with grass-fed cattle and certified by Bord Bia, the Irish Food Board. This is the first year we have been able to report this data.

Future Plans

Despite the challenges facing the wider industry, some of which may impact progress on animal welfare, we will continue to prioritise making improvements in this area. Our cross-functional Chicken Strategy Working Group is building on the positive work that has already taken place to improve welfare standards. As part of this work, we will be refreshing our strategy and roadmap to progress.

We will continue to work with suppliers to understand and improve welfare standards, particularly in key criteria such as enrichment and stocking density and gain further insights to enable us to identify where improvements could be made.

Finally, we will work with those suppliers who fall under our SBTi commitment, making sure they are on track to develop targets by 2025 and supporting them wherever necessary.

Social Impact of Supply Chain

Protecting the rights of people across our value chain - from those who grow our food, to our employees, to our consumers and wider society - is central to who we are.

Given the complex nature of global agricultural supply chains there are a multitude of human rights risks including human trafficking, child and forced labour, poor working and living conditions, long working hours and low pay. The risk is greatest in countries with limited legal protections for workers or sectors heavily reliant on unskilled migrant workers.

Taking proactive action to identify, address and remediate any human rights risk and taking steps to ensure workers have decent working conditions is of critical importance to us.

Policies and Approach

Our Supplier Code of Conduct sets out our expectations for suppliers. These include:

- Upholding human rights, not employing child workers and taking all possible steps to prevent any instances of modern slavery
- Providing a safe and healthy workplace for all workers, including having a health and safety policy freely available to all employees
- Upholding the stronger of either the International Labour Organization standard or applicable local social and collective action rights of workers
- Managing community impact resulting from company and factory operations

The Supplier Code of Conduct also covers our requirements in relation to fair business practices, trade regulation, environmental impacts, supply chain responsibility and traceability. It applies to all our supply chain partners.

Our Ethical Compliance Manager is responsible for ensuring our suppliers meet our expectations on all issues relating to human rights. We use Sedex to monitor direct supplier compliance. Sedex is a membership organisation which helps deliver transparency in supply chains. We require 100% of suppliers to register on Sedex and fully complete the Sedex self-assessment questionnaire, which covers labour rights, health and safety, environment, and business ethics.

We also conduct third-party ethical audits to ensure the requirements in our Supplier Code and local laws are met. Strategic and high-risk suppliers are required to complete a third-party ethical audit every two years which is uploaded onto Sedex. Our preferred format is a Sedex Members Ethical Trade Audit, but we also accept specified alternatives. Suppliers that do not conform are expected to resolve this within given timelines and this will be verified by the auditor, either through a follow up audit or a desktop review. New suppliers are not approved until they comply with these requirements.

We use the information from Sedex to risk-assess our suppliers on an annual basis and create improvement plans for those identified as high-risk.

Progress

In 2022, we maintained our target of 95% of Tier 1 suppliers being registered on Sedex, which includes the integration of one of our recent acquisitions. 100% of our new suppliers (excluding those in our most recently acquired Adriatics markets) were screened using the Sedex risk assessment tool. We also successfully completed our 2022 audit programme for strategic and high-risk sites (both new and existing). We completed 125 audits, exceeding the audit programme's annual target. This progress took place against the backdrop of continued COVID-19 related restrictions, the Ukraine crisis and other external factors. These had a big impact on both our suppliers and our audit programme in several ways – for example increased costs within the supply chain.

Future Plans

In 2023, we will continue to maintain our target of 95% of Tier 1 suppliers being registered on Sedex, in addition to onboarding the Adriatics supply base onto Sedex. We also plan to audit 79 suppliers identified as high-risk through our risk assessment process. To ensure we achieve these objectives we will track progress and report against them in monthly cross-functional forums with the relevant stakeholders.

Indicator	2020	2021	2022
% Tier 1 suppliers registered with Sedex	95	95	95
% of new suppliers (including indirect suppliers) screened using social criteria	100	100	100

"We are pleased with the progress of our Ethical Compliance programme, which includes all new suppliers screened using the Sedex risk assessment tool and the ethical audit plan for strategic and high-risk suppliers. These processes are vital in mitigating risks and upholding ethical standards in our supply chain.

Sam Brown, Ethical Compliance Manager

Better nutrition

Health and Nutrition

Promoting healthy diets and lifestyles, combatting obesity and making nutritious food affordable and accessible to all, are areas of enormous importance, high on the agenda of governments, NGOs, the media and, increasingly, consumers.

Policies and Approach

Our Nutrition Manifesto sets out our eight key commitments to empower positive choices. These include providing clear and simple consumer nutrition information, making healthier and sustainable choices more convenient, and nutritionally optimising our products. Our Nutrition Policy outlines our approach to labelling and product optimisation and has been reviewed by our independent expert Nutrition Advisory Board, comprising of leading independent nutrition experts from around Europe. Both our manifesto and our policy apply to all Nomad Foods brands and territories.

Our Nutrient Profiling Tool

Score	<4	4 – 10	11+
	Healthier meal choices		

Our Nutrient Profiling Tool

To deliver on our policy, we assess all our products against our Nutrient Profiling Tool (NPT). This uses an externally-verified scoring system to assess the nutritional profile of products to determine whether they constitute a Healthier Meal Choice (HMC). It assesses positive ingredients and nutrients, including fruit, vegetables, fibre and protein, and nutrients of public health concern such as sugar, salt and saturated fat. For more details on our NPT, see page 25 of our 2020 report. All our research and development experts, including our chefs, are trained in applying the NPT. We operate a strict gate-keeping process for new products. Any product not classified as a HMC is automatically challenged and may be rejected or redeveloped before we launch.

Our Nutrition Strategy

Our new Future of Nutrition strategy was launched in January 2022. The Nutrition Strategy reflects the evolving nature of the Nomad Foods product portfolio, which now includes occasional foods, such as pizza and ice cream, alongside our core everyday foods products such as vegetables, fish, plant-based foods and chicken. It broadens our commitment to both grow net sales from healthier meal choice products year-on-year, and to grow sales from nutritionally improved products year-on-year. It also includes a new segmentation of the portfolio, into Everyday Foods, Occasional Foods and Special Purpose Foods, based on externally recommended frequencies of consumption of the food categories we offer. Everyday Foods are subject to our highest nutrition standards. For Occasional Foods,

Target	Indicator	2020	2021	2022
Year on year improvement	% Total net sales from branded products assessed and classified as Healthier Meal Choices (HMC)	90.0	91.5	93.3
Year on year improvement	% total net sales from branded nutritionally optimised products	-	-	8.4
Year on year improvement	% total net sales from nutritionally optimised non-HMC products as a % of total non-HMC sales	8.0	9.5	6.6
Maximisation	% new product innovations that are assessed and classified as HMC	95	95	97

which can be more indulgent, our priority is nutritional improvement with the goal of making these healthier meal choices wherever possible. Special Purpose Foods target consumers with specific nutritional needs such as dysphagia, and thus need to be specially crafted to meet these. For more detail on our strategy, see the deep dive on page 27 of our 2021 report.

In the past year this strategy has been fully embedded across our business and is directing our approach to our new acquisitions in Switzerland and the Adriatics. The new segmentation has been applied to the whole business, and we are able to report against the different segments.

As part of the implementation process for the Nutrition Strategy, we launched a new ratings system for nutrition which links directly into the system we use to manage projects. Any non-HMC rollout is rated 'red' in the system, which in turn prompts a rejection of the project and leads to a process where the business case is weighed up against our nutrition commitments/KPIs. This

has led to 100% of our rollouts being HMC for 12 consecutive quarters.

Our new Nutrition Strategy includes a Responsible Sugar Strategy which was also launched in January 2022, to drive further sugar reduction and the avoidance of 'hidden sugars'.

Over the past year, we have also been working on the integration and onboarding of our new acquisitions, seeking to understand the nutritional profile of these new portfolios, their use of claims and labelling, and adherence to our Codes of Practice for Nutrition Data Requirements and our Marketing to Children policy.

Educating our people is a key component of our ability to deliver on our strategy. We have a Nutrition Training Programme which is designed to ensure that all colleagues understand the health landscape where they are, know why nutrition is important at Nomad Foods and what our ambitions are for the future, and that they are aware of, and compliant with, our nutrition policy. The programme also helps us onboard new acquisitions and run induction sessions for new employees. For detailed insight into our programme, please see the [Educating Our People deep dive](#).

Action on Fibre

In late 2021 we became inaugural signatories of the Action on Fibre UK initiative. As part of this we pledged to bring new products to the market that are a source of, or high in fibre across our three brand portfolios, to reformulate products to increase the fibre content, to provide positive fibre messaging and educational materials and to support Fibre February. See the progress section below for information on the impact of this activity in the past financial year.

Green Cuisine

In the past year we also developed a new nutrition and sustainability strategy for Green Cuisine. The strategy stipulates that all green cuisine products must be HMC. This makes Green Cuisine the first brand to have a mandatory HMC requirement. This represents a step-change in how we weigh up sustainability vs nutrition for Green Cuisine and is central to us achieving our ambition to help the population shift to more healthy and sustainable diets.

Nutritional Labelling

We use on-pack nutritional labelling in every market we operate in to enable informed choices for our consumers. This currently includes traffic light labelling in the UK and Ireland, Nutri-Score labelling in France, Belgium Germany, Austria, Portugal and Spain, the Keyhole symbol in Sweden and Norway, and the Heart Mark symbol in Finland.

Progress

In 2022, we increased the proportion of our net sales from HMC products to 93.3%, which translated to an increase of over €126 million, and represents a 1.8% increase on 2021. This delivers on our commitment to grow sales from healthier meal choices year-on-year.

As we rolled out our new approach to portfolio segmentation, we calculated a new baseline for our Everyday Foods. This showed that 97.7% of Everyday Foods are HMC, meaning we are already delivering against our commitment to maximise HMC in this segment.

We also achieved strong performance in the Occasional Foods Segment, with over 43% of net

sales and volumes coming from nutritionally improved products, meaning we are also delivering against our target for this segment, which is maximising nutritional improvement.

Despite these improvements, we saw a slight fall from 9.5% in 2021 to 6.6% in 2022 on progress towards our measure of improving year-on-year the percentage of total net sales from nutritionally optimised non-HMC products as a percentage of total non-HMC sales. This was the result of the challenging economic circumstances and volatility of the past year, which meant our renovation pipeline couldn't be delivered as originally planned.

Product launches, renovations and rollouts to new markets are crucial opportunities to drive nutritional improvement. 2022 was our best year ever for HMC innovations. 100% of our existing products rolled out to new markets and 97% of new product innovations were HMC, and 92% of renovated products were HMC, an increase of 7% from 2021.

In relation to the nutritional improvement of our products, one standout example is Goodfellas Pizza. In 2022, over 85% of our Goodfellas pizza range were HMC, and 68.7% of net sales were HMC, an increase of 49.4% from 2021. We were able to achieve this significant progress through looking at the totality of the product and improving all elements of the pizzas, from the base to the sauce to the toppings. We also used sensory testing – we wanted these healthier products to taste indulgent and for consumers to enjoy them. In total, so far we've innovated or renovated 18 pizza recipes to be HMC (non-HFSS).

We have also made significant progress on fibre. Overall, based on full year 2022 sales volumes, our renovated products added 113,375,366 portions (3g) of fibre onto the nation's plates - and our 6 key innovations launched across 2022 delivered 1,759,495 additional 3g portions of fibre onto the nation's plates.

Our 2022 performance adds to a strong legacy of nutritional improvement and we were proud to receive a 100% Health and Nutrition score on the Dow Jones Sustainability Index for the 4th consecutive year (2019, 2020, 2021, 2022) – demonstrating our nutrition leadership.

We also seek to influence a wider shift towards healthier, more sustainable diets, and have worked throughout the year to share best practice and valuable insights with policy makers and key opinion formers and take key learnings from this engagement.

Future Plans

Now that we have baselines for the healthiness of our Nutrition Segments sales, we will continue to focus our efforts to achieve year on year improvements, as set out in our strategy.

We will also continue our work to integrate the new acquisitions in our business and look forward to being able to provide information and insight into the work we have planned to ensure compliance with our policy and strategy, and to optimise them nutritionally.

In 2023, we will also continue to engage policy makers on topics including front of pack nutrition labelling, nutrition data transparency, frozen food benefits and HFSS compliance.

> *Our 100% Health and Nutrition score on the Dow Jones Sustainability Index for the 4th consecutive year demonstrates our robust nutrition governance and strong commitment to empowering positive choices by consumers. Our focus on nutritional improvement and creating healthier meal choices across both our Everyday and Occasional Foods portfolios is especially demonstrated by our Goodfellas pizza range – over 85% of recipes are now classified as a healthier meal choice, as a result of nutritional improvements across all elements, from base to sauce to toppings*
>
> Lauren Woodley, Senior Nutrition Manager

Deep Dive: Educating our People

Educating Our People

Educating Our People is one of eight commitments in our Nutrition Manifesto. One of the central strands of this commitment is our nutrition training programme. The programme is designed to ensure that all colleagues understand the health landscape where they are, know why nutrition is important at Nomad Foods and what our ambitions are for the future, and that they are aware of, and compliant with, our nutrition policy.

Our nutrition training programme plays a particularly important role for our Research, Development and Quality (RDQ) and Marketing teams. For these teams, the Nutrition Team undertakes horizon scanning for issues that are likely to grow in importance and then provides training on these topics and on additional topics the team is interested in. As well as building knowledge, the content covered in the programme helps to stimulate ideas on future products or product claims and the training sessions often serve as an effective test ground for nutrition messaging. Seeing what messages land with colleagues internally helps us to hone messages for consumers.

In 2022, our nutrition training programme created more than 820 nutrition learning moments. These were delivered through several different training sessions, including our new nutrition onboarding approach, bespoke nutrition training, Go for Green sessions and our learning series. As part of the training programme, we also provide educational materials on our employee intranet, Nomad & Me.

Nutrition onboarding

When new colleagues join Nomad Foods, our training programme brings them up to speed on our approach to nutrition. To welcome our new Adriatic colleagues, we developed a new model for nutritional onboarding: *Paddle, Swim, Dive. Paddle*, the first level of engagement, gave the entire Adriatic team an introduction to nutrition, including our Nutrition Profiling Tool. *Swim* was aimed at getting the RDQ and Marketing teams up to speed on more specific topics, such as responsible per portion guidelines and our nutrition labelling manual, and *Dive* included deep dives into function-specific topics. For example, we held a session on our salt strategy for RDQ and delivered a Claims and Communications masterclass for the Marketing team. A total of 110 colleagues from RDQ and Marketing joined our nutrition onboarding sessions. We are using this experience to create an Ideal Onboarding Manual.

Bespoke nutrition training

The programme also includes running bespoke sessions for specific markets, brands or regions. For example, we ran a session for our Green Cuisine team, on plant-based eating and diets. We also ran bespoke training for our Careline Team and for our French RDQ and Marketing colleagues who wanted to know more about front of pack labelling.

Go for Green

Our quarterly Go for Green sessions are an opportunity for our RDQ colleagues to deep dive into a business-focused topic of their choice. These sessions are also an opportunity for the nutrition team to communicate with the wider team, for example giving updates from across the business or sharing requirements for new product launches.

Learning series

Each year, the nutrition team develops a learning series designed to educate colleagues on a specific topic and the surrounding science. In 2022, we chose the gut microbiome. We shared on-demand educational modules through the Nomad & Me platform, which covered myth busting content around issues including calories, diets and probiotics, and we ran training sessions to go through the content in more detail. Originally developed for RDQ, the series has since expanded to different functions across the business. Our topic for 2023 will be sugar.

Alongside the annual topic, we also deliver ongoing educational content and training on core strategic objectives. This year, to coincide with our UK Action on Fibre pledges, we chose to focus some of our training on fibre. To mark Fibre February, we ran interactive 'Know Your Fibre' quizzes for more than 200 colleagues and published educational materials on Nomad & Me, including a podcast and on-demand cookalong. We also ran a bespoke fibre learning session for RDQ.

Looking to the future

Looking forward, we are hoping to create an internal intranet for Nutrition which will hold educational resources and recordings of training sessions so that they are available on-demand to all colleagues.

Additives

Consumers increasingly expect food brands to create products without artificial additives.

Using certain additives and less familiar ingredients (such as phosphates, E-numbers, MSG, artificial colours and flavourings) risks reputational damage with policymakers, governments, civil society groups, the media, and, ultimately, consumers.

Policies and Approach

Our Clean Labelling Policy, which has been in place since 2003, outlines our approach to ingredient selection. Based on consumer research, we categorise all ingredients into four categories to assess whether they meet consumer demand for familiar, natural ingredients:

- **A – Optimum:** Natural, unprocessed or minimally processed ingredients. Examples: Eggs, Milk
- **B – Accepted:** Natural ingredients, perceived to be generated in a simple and/or traditional process. Examples: Egg powder, Skimmed milk powder.
- **C – Used by Exception:** Ingredients with a level of adverse perception, but which are natural in origin and/or traditionally used. Examples: Natural flavours, Yeast extract, Whey protein.
- **D – Unacceptable:** Artificial additives. Examples: MSG, Hydrogenated fats.

We use these standards to determine our ingredient selection when developing new products or reformulating existing ones. We aim to maximise our use of 'Optimum' ingredients, and do not allow 'Unacceptable' ingredients to be used

in any of our products. Our target is for 100% of our portfolio to be free from flavour enhancers, artificial flavours and artificial colourants by the end of 2023. This target was previously for 2022 but has been extended to 2023 to give us time to work with new acquisitions on recipe improvements to remove artificial ingredients.

Our Clean Label Steering Committee monitors our progress and drives ongoing improvement. We have a strong governance process to ensure that 100% of our new products are free from flavour enhancers, artificial flavours and artificial colourants.

Freezing food delays spoilage, reducing the need for other preservatives. Therefore, we do not add preservatives to our frozen food products, except where these are necessary for food safety or where the traditional method of creating a product involves adding preservatives (for example, ingredients such as ham).

Progress

At the end of 2022, 99% of our portfolio was without flavour enhancers, artificial flavours and artificial colourants. This is a percentage point increase from 2021. We achieved this through recipe improvements to reduce artificial ingredients across our Goodfellas UK & Ireland, Findus Spain and Findus Nordics ranges. Our acquisition of Findus Switzerland introduced several new products containing artificial ingredients to our portfolio and we have worked hard to improve these recipes as well.

Future Plans

We are on track for 100% of our portfolio to be free from flavour enhancers, artificial flavours

Target	Indicator	2020	2021	2022
100% by end of 2023	% Branded products without flavour enhancers, artificial flavours and artificial colourants	97	98	99

"We have continued the success of last year, with 99% of our portfolio now free from flavour enhancers, artificial flavours and artificial colourants. This is a result of recipe improvements across both legacy brands and recently acquired Findus Switzerland.

Barbara Schausberger, Head of RDQ, Western Europe

and artificial colourants by the end of 2023. In 2023, we will focus on removing artificial ingredients from the remaining 1% of our portfolio, whilst also understanding the status of products within our newly acquired businesses.

We will also continue our focus on clean labelling. Clean labelling is a requirement in all new and existing product development. We have also identified existing products that require a clean label upgrade and will be taking action on these in 2023.

Responsible Marketing

Transparent marketing and labelling help consumers make informed food choices.

Marketing and labelling can also help to shift consumers towards a more sustainable, nutritious diet, increasing consumption of plant based foods and promoting regenerative agriculture.

Policies and Approach

Transparent nutritional labelling is central to our Future of Nutrition Strategy.

Our Nutrition Policy sets out our internal standards on the use of nutritional on-pack claims, which go above and beyond statutory minimums. We use nutritional labelling on pack in all our markets, which includes information on all key nutrients. We use front-of-pack nutritional labelling where possible, and we voluntarily label fibre.

We also continue to use our influence as a leading European food company to call for mandatory and harmonised front of pack nutritional labelling (FOPNL) across Europe, and for a UK approach to FOPNL that aligns with Europe. We believe that this is vital to ensure the industry enables informed food choices by consumers across the region.

At the end of 2022, we reviewed and updated our Marketing Policy. This included important updates to our approach to Marketing to children, which is particularly important given the fact that our portfolio now includes ice cream, following recent acquisitions. Key changes included:

- Defining infants, children and teenagers clearly
- Evolving the policy and approach to account for the edible ices (ice cream, water ices, ice cream cakes) business we acquired
- Evolving the policy and approach to account for co-branded products
- Being more explicit as to how we define Marketing to Children
- Being explicit in how we responsibly use websites and interactive media
- Expanding the remit of the policy, to include our use of all fantasy, animated characters, celebrities or influencers that appeal primarily to children.

New UK regulation which restricts the placement of HFSS products came into force in 2022. While this did not have direct implications on marketing, we have ensured that there is HFSS compliance across the regulated product categories in our UK brands, Birds Eye, Aunt Bessie's and Goodfella's.

Progress

The update to our Responsible Marketing Policy, outlined above, has been a key focus in the past year. As part of the update, we have also provided training to colleagues across Nomad Foods in the new policy.

We have been working to fully map the products, packaging, placement and marketing of our ice cream portfolio, as part of the onboarding and integration of our new acquisitions. This fed into the update to the policy, and also enabled us to audit the portfolio against the updated policy and create workstreams to drive action where needed.

Our marketing team, research, development and quality team and our sustainability and legal teams have also collaborated to create a new training video around 'Bold Claims' for the Nomad Foods Marketing community as part of our continuous learning approach.
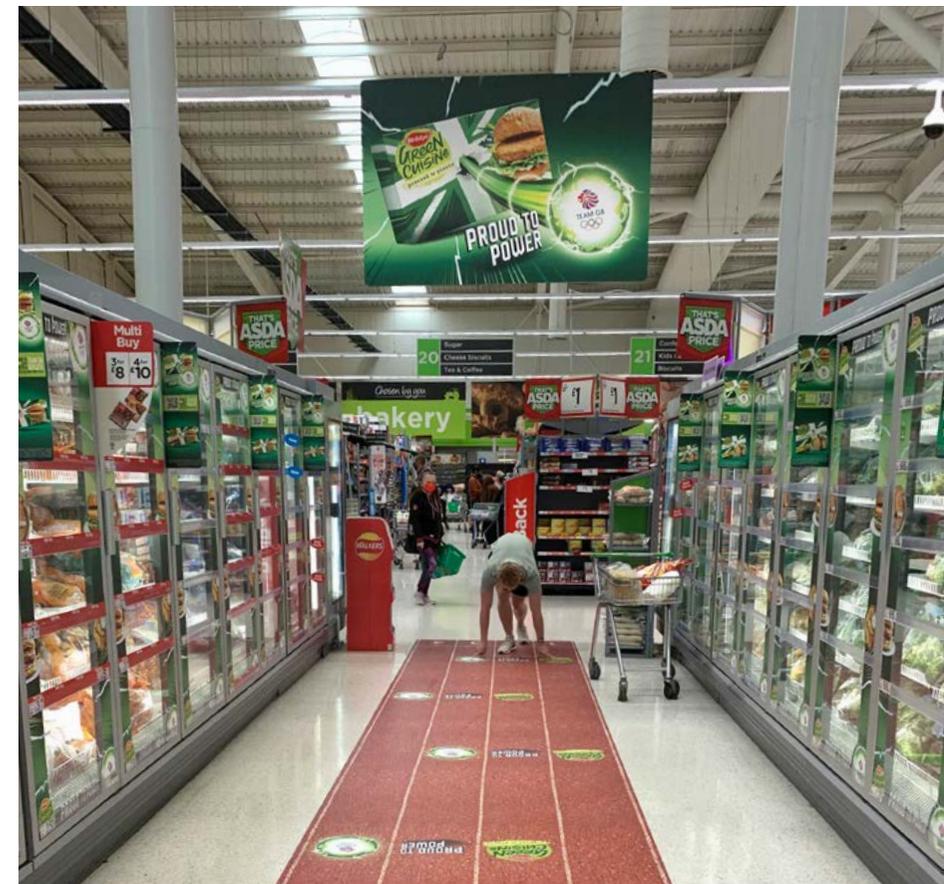
Product Safety and Quality

Food safety is essential for the success of our business and the health of our customers.

Concerns about the safety or quality of our products risk damaging our reputation, increasing our operational costs and decreasing demand for our products.

Policies and Approach

Our Quality and Consumer Safety Policy outlines our commitment to ensure product safety, and the steps required to identify, control and monitor points of potential safety risk. This policy covers every stage of the supply chain. It applies to all operating sites and product categories, including anything manufactured by third parties.

When selecting new suppliers, we set high standards for food safety and quality. We require all new suppliers to be accredited to the BRC Global Food Standard at A grade or a GFSI equivalent standard, and we review their certification status every year. We also demand that all raw material ingredients are provided with signed supplier specifications. These specifications ensure the absence of chemical, microbiological and physical contamination of materials.

With certain key ingredients, we set stricter standards on traceability. Products such as our MSC- and ASC-certified fish, and our RSPO-certified palm oil are supplied through a chain of custody scheme (see Sourcing: Fish and Seafood and Sourcing: Crops sections for more details). This guarantees that they have been sourced in accordance with enhanced sustainability standards.

We take numerous steps to ensure compliance with our policy and specifications. We run an extensive Food Fraud and Adulteration Prevention programme. This includes horizon scanning, intelligence sharing with other food businesses and laboratory testing of our raw materials.

We conduct formal risk assessments on all our food and packaging suppliers, using an assurance scheme which complies with the Global Food Safety Initiative (GFSI). If we identify instances where suppliers fail to meet our standards, we reassess them after an agreed period to ensure non-compliances are being addressed. We then use this information to determine whether we continue using the supplier.

We also conduct regular product audits within our supply chain. Our audits cover a wide range of factors that include but are not limited to: food safety systems; hygiene standards; traceability; operational procedures; maintenance; security; training; and food fraud prevention. Traceability is an important part of our audit process, and we carry out hundreds of traceability challenges every year. Our audits also test emergency response procedures to ensure product safety. Audit results are used to drive corrective action on the quality of the products suppliers deliver to us.

We train employees regularly on product safety. Our auditors and quality staff receive training in specialist subjects that include but are not limited to: hygiene design; food safety systems; allergen management; and microbiology. We view professional development an ongoing process and assess individuals' training needs using our HR capability matrix tool. Once food is placed on the market, we also operate a Consumer Care Line to receive and respond to feedback from consumers.

For more details on our food safety procedures, see our 2022 annual report.

Indicator	2020	2021	2022
% Supplying sites within Nomad Foods supply chain operating to an international food safety system	98.5	98	95
Number of incidents concerning food safety and quality	4	10	14

Progress

Due to the war in Ukraine and the impacts of poor harvests, our focus in 2022 was on maintaining supply for production. To restrict our exposure to sunflower oil coming from Russian controlled areas, we rapidly switched from sunflower oil to rapeseed and other oil sources in several products.

To ensure continuity of supply to Europe from the UK following the UK's exit from the EU, we changed how we make chicken products in our Lowestoft facility, moving from raw products to a cooked variant for export.

In 2022, we saw a small reduction in the percentage of supplying sites within our supply chain that operate to an international food safety system. This was due to the inclusion of Findus Switzerland and the completion of a gap analysis of our supply chain. We also saw a small increase in the total number of incidents concerning food safety and quality. We have an incident management steering group that meets regularly to review all incidents, including food safety and quality issues, to ensure any required actions are completed.

Better operations

Greenhouse Gas Emissions

According to the United Nation's Food and Agriculture Organisation, the food system contributes a third of global greenhouse gas emissions.

It is also vulnerable to the impacts of climate change through increased frequency of unpredictable or extreme weather events, decreased land availability, water scarcity, social health deterioration, rising sea temperatures and ocean acidification.

Failure to mitigate the worst impacts of climate change not only threatens lives and livelihoods across the world but could materially impact our business. Consequently, we have a critical role in playing our part to reduce greenhouse gas emissions across our value chain. For more detail on the risks posed to our business by climate change, see our 2022 annual report.

Policies and Approach

Our Safety, Health and Environment Policy sets out our commitment to measure, manage and mitigate our environmental impact.

Since 2018, we have had a target to reduce our greenhouse gas (GHG) emissions per ton of finished foods each year and in 2021, we set ambitious emissions reduction targets approved by the Science Based Targets initiative (SBTi). By 2025, we are committed to reducing our Scope 1, 2 and 3 GHG emissions per ton of product by 45% from our 2019 baseline, equal to a 25% absolute reduction. In addition, we have committed to ensuring that the top 75% of our suppliers by emissions, covering purchased goods and

GREENHOUSE GAS EMISSIONS	
Scope 1	
Direct emissions from owned and controlled sources	• Gaseous fuels: Natural gas, bio-gas, propane and LPG** • Diesel / petrol • Wooden pellets* • Lubricating oils • Liquid CO2 and dry ice • Air conditioning (refrigerants)
Scope 2	
Indirect emissions from the generation of purchased energy	• Purchased electricity • District heating • Purchased steam**
Scope 3	
Indirect emissions that occur in our value chain	• Materials for reuse and waste • Diesel / petrol / electricity from leased vehicles • Liquid nitrogen • Propane • LPG** • Fertiliser • Fresh and waste water • Electricity in external warehouses of finished goods • Electricity to run freezers** • Inbound logistics of finished goods • Outbound logistics of finished goods **

*added to scope as of 2020
**added to scope for the Adriatics only as of 2022

services, develop their own science-based target by 2025. We are also members of the UN's Race to Zero campaign, the largest ever alliance committed to achieving net zero carbon emissions by 2050 at the latest.

To assess progress against our targets, we measure our corporate carbon footprint annually by calculating our total Scope 1, 2 and 3 emissions and converting them into equivalent tonnes of carbon dioxide. Our footprint covers our own operations (i.e. all factories operated by

Nomad Foods, excluding co-packers), all owned and third-party warehousing, and inbound and outbound logistics of finished goods. Data is calculated and reported in line with the GHG Protocol, and externally audited. Our 2022 footprint includes the recent acquisitions of Findus Switzerland and our new business in the Adriatics.

We collaborate with others to maximise the positive impact we can have. In 2020, we joined the global fight against food waste initiative, 10x20x30, which unites the world's largest food

retailers and providers to reduce food waste. Each member commits to working with at least 20 suppliers to halve food loss and waste by 2030, in line with UN SDG target 12.3. Some of our markets have also signed pacts or pledges on a national level to help reduce food waste.

Progress

We have presented a breakdown of the data to enable comparability with data reported in previous years. The 2022 Nomad Foods legacy data relates to all business operations excluding Findus Switzerland and the Adriatics and can therefore be directly compared to data from 2019, 2020 and 2021. The 2022 Nomad Foods total refers to all business operations including Findus Switzerland and the Adriatics. We have also provided data for each of these businesses separately.

Nomad Foods legacy

In 2022, we reduced our absolute emissions by 23.4% and our emissions intensity by 23.9% from a 2019 baseline. This is slightly ahead of our SBTi target trajectory for absolute emissions. We also reduced absolute emissions by 10.8% and emissions intensity by 2.5% since 2021. This reduction in absolute emissions was achieved mainly through having all Nomad Foods legacy factories running on 100% renewable electricity for an entire calendar year and reducing emissions related from waste and materials for reuse.

Our total carbon footprint for the legacy business in 2022 was 258.8 kilotons CO2e.

Findus Switzerland

We included the emissions data for Findus Switzerland in our 2021 report (in 2021, Findus Swit-

zerland's absolute greenhouse gas emissions across Scopes 1, 2 and 3 were 3.32 kilotons CO2e). Against this baseline, in 2022 we have seen a 21% reduction in total absolute emissions and a 23.2% reduction in emissions intensity.

Nomad Foods total

In our newest Adriatics markets we are responsible for all outbound logistics and also provide more than 100,000 freezers to our customers which are directly owned by us. This is different to how we operate in other markets and has had a significant impact on the profile of our carbon footprint, almost doubling our absolute

emissions. Our absolute carbon footprint in 2022, which includes Findus Switzerland and the Adriatics, was 453.1 kilotons CO2e. These significant changes in company structure and operations will trigger a target recalculation under the SBTi reporting and recalculation criteria.

The primary sources of carbon related emissions within our operations were freezers (26.9%), waste & materials for re-use from our factories (26.3%), energy (23.5%) and logistics and warehousing for our finished goods (15.8%). Now that we have calculated our baseline for the Adriatics business we will be working on an emissions reduction strategy, which will include a focus

Target	Indicator	2019	2020	2021	2022			
		(Nomad Foods legacy) = Baseline Year	(Nomad Foods legacy)	(Nomad Foods legacy)	Nomad Foods legacy	Findus Switzerland	Adriatics business	Nomad Foods total
Reduce by 25% from a 2019 baseline by 2025	Scope 1 GHG emissions (kilotons CO2e)	67.3	92.48	91.97	85.21	0.63	28.44	114.28
	Scope 2 GHG emissions (kilotons CO2e)	47.5	16.73	7.04	0.04	0.06	20.31	20.41
	Scope 3 GHG emissions (kilotons CO2e)	223.0	192.11	191.01	173.55	1.93	142.95	318.43
	Total (% vs baseline)	337.8	301.30	290.02	258.80 -23.4%			
Reduce by 45% from a 2019 baseline by 2025	GHG emissions intensity (kgCO2e per ton of finished goods)	-23.4%	484.7	479.6	467.8	553.3	1,566.8	668.8
	% vs baseline				-23.9%			
	Absolute volume of waste generated (tons)*	51,521	54,683	52,557	46,738	317	8,889	55,944
	Volume of freshwater consumption (m3)	4,741,312	5,185,407	5,956,822	4,920,606	34,547	641,659	5,596,812
	Volume of effluent water discharged (m3)	4,058,960	4,321,274	4,431,797	3,900,972	27,642	569,564	4,498,178

*Any materials that are repurposed for animal feed and surplus food (sent to food charities) are neither considered waste, nor included in waste reporting.

23.9%
reduction in emissions intensity since 2019

33%
reduction in edible food waste since 2015[3]

on logistics, warehousing and the emissions associated with our freezers. The biggest drivers of emissions in our legacy business are as follows:

Waste
Waste and materials for re-use make up the second largest proportion of our emissions, after the emissions associated with our owned freezers. There has been a decrease in absolute volumes of waste across Nomad Foods legacy compared to 2019, and only a slight increase with the addition of Findus Switzerland and our Adriatics business. We have also delivered a 33% reduction in edible food waste since our 2015 baseline. When we include Findus Switzerland and the Adriatics, we have still delivered a 19.5% reduction since our 2015 baseline.

Energy
In 2022, our dedicated energy efficiency workstream continued to identify and explore opportunities to deliver current operations in a more efficient manner and to switch to low carbon or renewable energy alternatives. We conducted five externally supported site studies to identify opportunities to make our factories more efficient and further internally facilitated reviews to establish a pipeline of projects to be executed in 2023 and beyond.

2022 was the first year all our legacy sites ran on 100% renewable electricity for the whole year. As part of our objective to increase our use of renewable energy, we also carried out a group-wide study to identify the operational sites where solar could have the biggest impact and will be exploring this further in 2023. At the end of 2022, we also switched from a gas fuelled fume scrubber at our Bremerhaven factory to an electrically powered UV system. This will remove all carbon emissions associated with the previous system.

Water
In 2022, our freshwater consumption and effluent discharge across Nomad Foods legacy sites decreased in absolute terms compared to 2021. With the addition of Findus Switzerland and our Adriatics business, we have seen a slight decrease in absolute terms in our freshwater consumption and effluent discharge compared to 2021.

Supplier emissions
Collaboration with suppliers is critical to deliver emissions reduction across our operations. As part of our roadmap to net zero, we have set a target, for the top 75% of our suppliers by absolute emissions volume to develop their own science-based targets by 2025. Recognising that it is more challenging for some of our suppliers than others to reduce their emissions, we have provided toolkits and other support such as joint business plans to help them on their journey. By the end of 2022, almost a third of our target suppliers had committed to set science-based targets and around half of these had already set them.

Future Plans
Our priority is delivering emissions reduction in line with our Race to Zero commitment and our science-based targets. Having now assessed our GHG emissions footprint for the Adriatics markets, including waste and water, we can now establish reduction pathways for the business. We will continue to explore the potential for wider deployment of solar panels, solar heating systems and wind power, and our Operational Excellence Programme will continue to explore where efficiencies can be made across all our operations.

"The acquisition of our Adriatics business has had a significant impact on our carbon footprint, so our focus now is on establishing reduction pathways for the business. We will look forward to reporting on the progress we have made in next year's report.
Gareth Morgan, Group Head of Engineering

Packaging Lifecycle

Packaging protects the safety and quality of products. However, when poorly managed it can have negative environmental impacts on ecosystems.

As consumer and media scrutiny of packaging issues increases, poor packaging lifecycle management could also pose a reputational risk for Nomad Foods.

Policies and Approach

Our Policy on Packaging sets out our commitment to reduce packaging volumes, use recyclable packaging materials and promote reuse and circularity. We aim to use sustainably managed virgin paper and FSC or PEFC-certified suppliers to package Nomad Foods products. We also use recycled materials wherever possible. However, legislation in all our markets that limits the use of recycled content from mainstream mechanical recycling for food packaging makes this challenging. The policy covers all packaging elements within our product supply chain. This includes:

- Primary packaging: Packaging taken home by the consumer, usually in direct contact with an individual product
- Secondary packaging: Packaging used to group products into stock-keeping units
- Tertiary packaging: Bulk or transit packaging used to transport larger volumes of products

As set out in our policy, all new packaging development is assessed against sustainability criteria. To be approved, all packaging must maintain food safety and product quality and, where technically possible, meet our recyclability criteria. Within our Packaging Code of Practice, we have key design guidelines for maximising packaging recyclability that is shared across all Nomad R&D Packaging teams. To help consumers reduce packaging waste, we use on-pack waste and recycling labelling systems in 14 markets. In the UK, Birds Eye is also a founding signatory of the UK Plastics Pact: a collaboration between businesses, NGOs and the UK government to eliminate unnecessary plastics and increase recycling.

Sustainable design principles

Minimise packaging use	**Maximise plastic recycling**
Support the future of packaging	**Drive circularity**
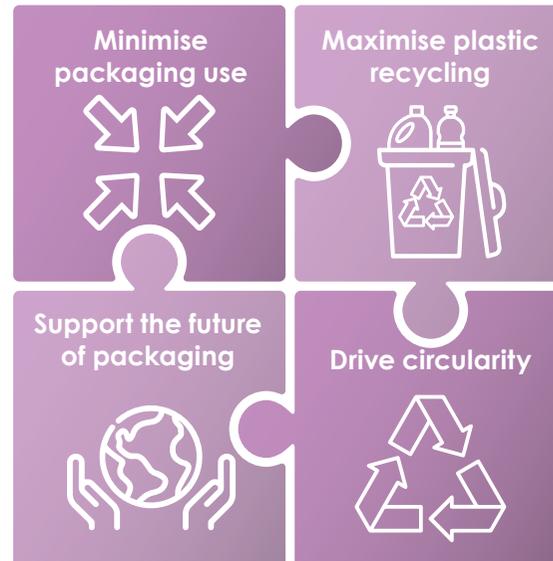
Due to technical challenges, we have extended our original target which was 100% recyclable consumer packaging by 2022, to 2030 and introduced additional packaging commitments to help focus our efforts and activity:

1. By 2030, 100% recyclable consumer packaging
2. Increase our use of recycled content in flexible plastic packaging
3. Reduce overall packaging weight year on year

We are working to establish baseline data for our recycled content and packaging weight commitments and will report on these next year.

Progress

In 2022, 96.5% of our packaging portfolio was recyclable. This was an increase of 6 percentage points from 2021: the result of innovation within our packaging materials and significant progress in the Nordics, where we continued our roll out of recyclable pillow bags, switching 240 tonnes of non-recyclable packaging into recyclable. While not currently included in the overall recyclability calculation, we also replaced non-recyclable lids from all 120ml Ledo cones with recyclable paper alternatives.

We have also reduced our dependence on virgin packaging materials by increasing the use of recycled content. At our Lowestoft factory, we increased the post-consumer recycled content to 30% in our shrink wrap used for secondary packaging. In the Nordics, we supported an innovative new private label launch using mechanically recycled content in food contact applications. We also started to use Green Poly-

ethylene in the Nordics, driven by our Technical Innovation Pipeline. This has increased our use of renewable plastic by approximately 6.2 tonnes.

We have continued our focus on reducing the overall volume and weight of our packaging. By removing the reseal feature from our resealable vegetable packs sold across the UK, Ireland, Portugal and Italy, and reducing the bag size, we have reduced the plastic packaging on these products by 70%. Implementing this change required a cross functional business approach and an alignment of all business units behind the need to prioritise sustainability over consumer convenience. We also reduced the thickness of bags sold in the Nordics, removing a further 20 tonnes of plastic annually (based on 2022 sales volume).

Future plans

In 2023, we will be integrating Switzerland and the Adriatics acquisitions into our reporting and clarifying the relevant baselines for new commitments and targets.

We will continue to focus on replacing non-recyclable packaging with recyclable alternatives and reducing packaging where possible, with a particular focus on potato film reduction, fish carton optimisation and the continued reduction in thickness of bags in the Nordics. We will also conduct further testing of recycled content in our packaging so that we can increase the proportion of these materials used across our portfolio.

Target	Indicator	2020	2021	2022
100% by end of 2030*	% Packaging material that is recyclable	83.4	90.4	96.5
N/A	% Packaging material that is renewable	47.2	61.2	62.1

Timeline for target extended to 2030 from 2022 due to technical challenges reaching 100% by 2022

"We continue to make significant progress towards our recyclability target, with 96.5% of our packaging now recyclable. We will apply the same cross-functional business approach to increasing recycled content and reducing packaging weight to drive improvements on these new targets."

Adam Falck, Packaging Development Manager – Implementation

Deep Dive: Life cycle assessment of frozen food

As part of our ongoing efforts to understand the impact of frozen food compared to non-frozen alternatives and to direct our emissions reduction efforts, in 2021 we commissioned a unique end-to-end life cycle assessment (LCA) study which compared the carbon footprint of 22 of our most popular frozen foods products with their non-frozen alternatives. The study was peer-reviewed by Prof. Dr. Matthias Finkbeiner, Prof. Dr. Greg Thoma and Kai Robertson – some of the world's most prominent experts in LCA methodology, agrifood LCAs and food waste. We provided an overview of the methodology and topline results in last year's report (see our 2021 Impact Report). Since our last report we have published both an executive summary report and full technical report, both of which are available on our website.

Many existing carbon labels and LCA studies are limited in scope, adopting a "cradle-to-gate" approach which excludes the distribution, retail, and consumer stages, including the emissions associated with retailer and consumer food waste. Our study goes beyond this to include all stages of the product life cycle, as well as primary data for all processing steps. Over the last year, we have been able to draw further conclusions from the study and identify how we can use it to support our own emissions reduction efforts and inform the wider ongoing debate around eco-labelling.

What the LCA study tells us

As we reported last year, the study found that for the 22 frozen products assessed, most had an equal or lower carbon footprint than similar products using other preservation methods, such as fresh or chilled. This is primarily because frozen has much lower levels of food loss & and waste – the energy required for the initial freezing and storage of the frozen products was offset by the reduction in carbon dioxide equivalent GHG emissions associated with the reduced food loss & and waste in the wider lifecycle of the products studied. In only three cases was the frozen product footprint found to be higher. We now know the factors that determine whether the carbon footprint of a frozen product is higher or lower than a non-frozen alternative (assuming the same carbon impact during production). These include the electricity mix used by retailers and consumers, the amount of time consumers keep frozen products in their freezer and the amount of food loss and waste at the retail and consumer stages.

The results of the study indicate the vital role frozen food can play in tackling the carbon emissions from food loss & and waste. They also illustrate the importance of including the whole life cycle in LCAs of frozen food products, and highlight the need for product and preservation method-specific food loss and waste data.

Supporting our journey to net zero

We are using the wealth of primary data gathered on our own products to identify where we can continue to reduce emissions and lower the carbon footprint of our supply chain and sharing results with key stakeholders including retailers to encourage. The results of the study also indicate the need to shift perceptions around frozen food and raise awareness of the role it can play in tackling food loss & waste and related emissions.

> *This is one of the most elaborate frozen food LCA studies ever done, covering not only a wide range of frozen food products and their alternatives, but also approaching them all in a consistent methodological manner. Combined with the large amount of primary production data included and the attention to detail at each stage, this study is one of a kind. Based on this study, we are now in the unique position to draw conclusions about the carbon footprint of frozen food products compared to their non-frozen alternatives and generalise these conclusions across the frozen food category.*

Ellen Meijer, Senior LCA Consultant, PRé Sustainability

LCA of 22 frozen food products and their alternatives

Third Party Technical Report

PRé
Fact-based sustainability

Employee Health and Safety

Keeping our employees safe is always our highest priority.

Failure to promote high standards of health and safety poses a risk to our ability to function as a business.

Policies and Approach

In 2022, empowering our people to take personal responsibility to make the right decisions every day to keep themselves and each other safe underpinned our approach to safety.

To support this, we reviewed our safety policy and governance process to ensure we could support an organisation that truly puts safety first. Our policy review focused on improving our behaviours in the workplace and ensuring we all take reasonable responsibility for our own safety. Our safety policy covers all Nomad Foods manufacturing facilities, offices, operational locations and all employees. It also encompasses contractors, visitors, local communities, potential mergers and acquisitions, and any other third parties that may be affected by our business operations.

We continue to drive for "Vision Zero", our ambition to cause zero harm to people and the environment, and in 2022 developed a multi-year roadmap and strategy for this that covers all Nomad Foods operations.

We also launched our new Nomad Foods Safety, Health and the Environment (SHE) standards. Based on five life-saving principles, these standards aim to reduce risk in the areas where high severity accidents may occur. We set minimum standards and robust controls for two of

the five life-saving principles, and will do the same for the remaining three in 2023.

We also introduced a new role to strengthen our group safety strategy. The new Group Head of SHE will act as a key advisor to the supply chain leadership team and reports to our Chief Supply Officer. This role is responsible for ensuring health and safety processes are in place throughout all our systems and for continuing to raise awareness of processes for reporting and escalating incidents and injuries. Our company leadership teams will remain accountable for the health and safety practices within our business.

Progress

In 2022, we delivered significant improvements in our safety metrics. We reduced our accident total recordable case frequency rate by 3.43 and almost halved the total number of lost time accidents.

Several programmes contributed to this success. Through our Safety First Everyone Everyday programme (previously Activate Safety Now) we committed to train all our leadership on how to successfully drive safety through leadership behaviours and positive conversations. We completed over 3,000 hours of training, trained over 600 employees and identified dedicated safety champions at each factory to lead on programme deployment. We also invested significantly in our Machinery Safety programme. We used external experts to help identify risks associated with our equipment and will continue to remove these risks throughout 2023.

We also began rolling out the new Nomad Foods SHE standards across the organisation,

starting with workplace transport and lock out, tag out (a safety procedure to ensure dangerous equipment is properly shut down during maintenance or repair work).

We recognise that our Adriatic markets are less advanced on their safety journey and currently have higher accident rates than our legacy sites. Our focus in 2022 was on laying the foundations for success and developing roadmaps for regional SHE improvements.

Future Plans

We have set challenging targets for safety, ultimately working towards 'Vision Zero'. This includes targets for hazard identification, behavioural based safety observations and near miss identification.

We will continue to enhance our safety management system by rolling out the final three life-saving principles of the Nomad Foods SHE standards and building SHE expertise within our manufacturing sites.

We will also continue our Safety First Everyone Everyday programme in 2023, expanding the programme across the Adriatic region and maintaining our progress in legacy sites, and

Indicator*	2020	2021**	2022
Lost time injury frequency rate (number of lost-time injuries per million hours worked)	7.56	7.39	4.49
Number of total recordable work-related injuries	73	71	39
Rate of total recordable work-related injuries (number of recordable work-related injuries per million hours worked)	9.52	8.33	4.9

*All data refers to factory employees only
**Data for 2021 includes Findus Switzerland

> *Safety First Everyone Everyday and our other programmes have helped us deliver significant improvements in our safety metrics.*
>
> Rachel Rae, Head of Safety, Health and Environment

continue to remove risks associated with our equipment through our Machinery Safety programme.

We are committed to expanding our overall safety programme to all functions in Nomad Foods and will be implementing our expansion roadmap through 2023. The roadmap will identify specific actions we want to take in each of our functions, including procurement, offices, agriculture and logistics, to further imbed our culture of zero accidents. We will also be focusing on onboarding the Adriatic region to our central SHE standards and driving specific improvements on hazard identification and risk reduction.

Employee Wellbeing and Development

Supporting our employees to nurture their health and wellbeing and providing opportunities for everyone to develop and grow is essential to their success, and the success of our business.

Policies and Approach

Our Learning and Development (L&D) Policy sets out our commitment to investing in the continued development of our people. It outlines our ambition to build a learning culture that inspires and empowers all employees to drive their own development. This policy applies to all Nomad Foods employees.

Our UK-based L&D team co-ordinates Nomad Foods' L&D annual plan and investment. This plan is delivered through an international network of functional capability leads, HR Business Partners, internal subject matter experts, and external partners.

We have group-wide L&D programmes, and online and face-to-face L&D opportunities available for all employees. For key L&D programmes, employee and Line Manager feedback is collected both pre- and post-programme to evaluate impact.

We measure employee satisfaction, development and sustainable engagement through our annual 'Our Voice' survey, which is open to all employees. It covers eight areas including communication, L&D, and safety & wellbeing. Scores

from key questions are combined to an aggregated "Sustainable Engagement Score". This is used to inform continuous improvement of L&D planning, delivery, resources, interventions and technology solutions including Nomad Food's Learning Management System.

Progress

In 2022, we achieved a sustainable engagement score of 81, a decrease of four points from the previous year. Approximately three quarters of Nomad Foods employees participated in the survey, down from 81% in 2021. We have reviewed our overall and functional scores in detail to understand any areas for follow up or improvement

We continued to deliver our leadership and management programmes. Available to colleagues across Nomad Foods, these programmes are designed to build the essential leadership and managerial skills needed to support employees and deliver strategic objectives. We completed three cohorts of our management programme, and four of our leadership programme. We also ran our High Performing Teams programme, which enables managers to build an effective team.

We also launched our new leadership curriculum programme for our most senior leaders – what we call our Enterprise Leadership Team (ELT). Through a mix of online content, webinars and training sessions, this programme builds the skills and behaviours senior leaders need to drive the business, create and implement strategy, and support employees.

To support colleagues with their career progression we also piloted our new careers pro-

Indicator	2020*	2021	2022
Sustainable Engagement score	90	85	81
% Employees participating in 'our voice' culture survey	90	81	75**

* Due to Covid-19 restrictions we were unable to run the surveys with our factory (non-office) employees
** Figure is an approximation due to difficulties calculating the response rate without our Adriatic business

Employee Development Plans

We identify and assess our employees' individual L&D needs through the following processes:

- **Annual Performance and Development Cycle**: during annual performance reviews, the employee and their Line Manager discuss the employee's performance and identify development opportunities. They then jointly set individual performance and development goals, ensuring these are in line with Nomad Foods' strategic needs.
- **Career Development Planning**: between PDPs, the employee and their Line Manager discuss career development goals and development support the employee needs to fulfil their potential. This can include using benchmark profiles to help employees assess themselves against capabilities required in future roles.
- **Capability Assessments**: these self-assessments are completed by employees. Line Managers then validate employees' professional, technical and core capabilities against benchmark standards to identify and agree priority areas for development. Capability Assessments are currently available for some roles and will be rolled out to cover a broader set of roles where appropriate.

The outputs from these processes enable individual development plans to be created. Development plans define and describe development goals set out timelines for achievement, and highlight relevant learning activities. Where available, development plans also address gaps identified by Capability Assessments against benchmark job profiles.

gramme. This programme helps employees to build a robust career development plan that identifies the skills and knowledge they might need to advance their career at Nomad Foods. We also relaunched our mentoring programme, which for the first time included a highly successful reverse mentoring element. Connecting senior leaders with junior colleagues helped to bridge the generation gap and build understanding of the issues important to junior members of the team. We also provided a new suite of tools, techniques and help guides to facilitate the mentoring process and ensure it is a valuable experience for all involved.

To ensure L&D opportunities and resources are relevant to people's needs, we significantly expanded our e-learning content in 2022, including new resources adapted to different learning styles and available in several languages. This content is accessible via the Nomad Foods' Learning Management System, which we updated this year to make it is easier to navigate.

As part of our focus on health and wellness, we also provided colleagues with access to tools, resources and advice on how to manage their mental health including the Unmind app, and we implemented several awareness raising initiatives. For example, our theme for World Mental Health Day 2022 was 'make mental health and wellbeing for all a global priority'. We provided advice and support to employees through our communications platform, Nomad and Me, and several colleagues shared their own experiences, talking openly about mental health to bring the issue to life and reduce the stigma surrounding it.

A network of 'wellbeing champions' within the business are responsible for raising awareness of our wellbeing initiatives, available support and best practice more broadly. They meet regularly with the relevant HR directors to discuss feedback and issues relating to health and wellbeing.

Future plans
In 2023, we will refresh and relaunch our management and leadership programmes and we also have plans for the official roll out of our careers programme in 2023/4, following its pilot this year.

Diversity, Equity and Inclusion

Championing diversity, equity and inclusion is vital to overcome systemic unfairness, challenge discrimination, and create a society where everyone is valued.

Attracting, developing, and retaining diverse talent is also crucial for business success.

Policies and Approach

Our Inclusion and Diversity (I&D) Policy explains our commitment to creating an inclusive workplace. It also highlights our expectation that all Nomad Foods employees role model inclusive behaviour, drive their continuous professional development in the broad topic of I&D, apply their insight and learning into everyday practice and hold themselves and others accountable to be consciously inclusive. By each of us adopting an inclusive mindset we believe we will create the conditions for diversity, in its broadest sense, to flourish.

Our I&D focus for 2021-2023 is designed to expand and accelerate inclusion and diversity at Nomad Foods and strengthen governance. It is founded on extensive evidence that focusing on inclusion will lead to greater and more sustained diversity and business performance. We are taking positive action in the four areas proven to make the biggest impact:

- Inclusive Leadership: a rolling programme of inclusive leadership development starting with a focus on senior leaders and the HR Team.

- Inclusive Culture: an annual calendar of I&D events co-ordinated by our employee networks, designed to engage all colleagues, raise Diversity, Equity and Inclusion awareness and inspire positive action. Underpinning this programme is our Conscious Inclusion curriculum, a curated selection of bite-size videos and materials in all Nomad languages, designed to build baseline knowledge of key I&D topics such as allyship and bias.
- Inclusive Hiring: ongoing inclusive hiring training for Line Managers and HR to build capability and embed I&D in all recruitment processes.
- Focus on Facts: an I&D data capture process that provides greater transparency for all employees and enables the company to track and report progress.

The Nomad Foods Executive Committee governs, tracks, and reports I&D progress, Our Enterprise Leadership Team then supports local markets to translate strategy into action.

In addition to our internal efforts, our engagement in external I&D networks and partnerships is crucial. These include Boom!, a network for women in supply chain roles, and Diversity and Inclusion in Grocery, a community of FMCG brands that connect, learn and inspire change together.

Progress

In 2022, 31.9% of our employees and 27.8% of our Enterprise Leadership Team and Executive Committee were female. This is a slight decline from 2021, where 36% of our employees and 28% of our ELT and Executive Committee were female. The data shows that we see a significant

Indicator	2020	2021	2022
Gender distribution amongst employees (Female) %	35.9	36.0	31.9
Gender distribution amongst employees (Male) %	64.1	64.0	68.2
Gender distribution amongst employees by work level 4-7 (Female) %*	28.2	28.0	25.3
Gender distribution amongst employees by work level 4-7 (Male) %*	71.8	72.0	74.7
Age distribution across employees (<30) %		12.1	15.4
Age distribution across employees (30-50) %		50.5	49.1
Age distribution across employees (>50) %		36.5	35.5
Number of employees who have attended inclusive hiring training		164	132

* Examples of roles at each work level (WL): WL1 & WL2 = e.g., administration, factory worker, professional junior manager; WL3 = e.g., Manager, Head of; WL4-7 = e.g. Executive Committee and Enterprise Leadership Team.

increase in female representation across our junior grades, from 34% in 2021 to 52.7% in 2022. This is encouraging as it shows we are starting to address the balance at entry level.

We recognise there is more we can do to support women to realise their full potential and ultimately ensure fair representation of women in senior management and leadership roles. This is why we continue to invest in programmes such as Shine – an international programme to develop high-potential female employees.

In 2022, we also continued the roll out of our inclusive leadership curriculum. Once completed by the ELT and HR, we expanded it to our leaders in supply chain through an online curriculum and bespoke I&D workshops. These workshops covered three modules; conscious inclusion (completed by 107), inclusive leadership (completed by 264 colleagues) and inclusive hiring (completed by 185 colleagues).

Our employee networks also grew from five to six as we introduced a new Health and Wellness network. Our networks bring people from different countries, functions and locations together, based on their shared identities and experiences. They also include allies who are willing to take positive action on behalf of underrepresented groups—to break down barriers and promote inclusion.

Future plans

Our priority for 2023 is to continue the momentum achieved in 2021 and 2022, and further embed the core foundations of inclusivity within our organisation. We will continue to create awareness through our employee resource groups and update our policies to ensure they promote an inclusive culture and organisation practices. We also plan to expand the roll out our inclusive leadership curriculum to all leaders in the business.

Data

Data Tables

Data for 2022 in this report is inclusive of all trading subsidiaries of Nomad Foods except our Adriatic markets, unless otherwise stated.

Data for 2021 and 2020 in these tables and published in previous sustainability reports excludes Findus Switzerland and the Adriatics, which were acquired in 2021. Data for 2019 (excluding palm oil) excludes Aunt Bessie's and Goodfella's Pizza, which were acquired part-way through 2018.

SCALE OF THE ORGANISATION	Unit	2020	2021	2022**
Total employees in workforce*	People	4,822	4,538	7,535
Employees working in factories*	People	2,500	3,075	4,110
Total employees by region				
Austria	People	79	79	81
Belgium	People	38	39	35
Bosnia & Herzegovina	People	-	-	319
Croatia	People	-	-	977
Denmark	People	7	6	4
Finland	People	27	23	19
France	People	343	321	305
Germany	People	1,374	1,192	1,338
Hungary	People	-	-	8
Ireland	People	412	402	407
Italy	People	479	448	481
Kosovo	People	-	-	29
Macedonia	People	-	-	59
Montenegro	People	-	-	96
Netherlands	People	28	25	28
Norway	People	222	209	193
Portugal	People	26	25	28
Serbia	People	-	-	1,169
Slovenia	People	-	-	43
Spain	People	278	261	266
Sweden	People	175	155	214
Switzerland	People	-	-	80
United Kingdom	People	1,333	1,347	1,355
United States	People	1	1	1

*Includes all full time and part time employees
**Includes our Adriatics business

GOVERNANCE	Unit	2019	2020	2021
Confirmed incidents of corruption	Number	0	0	0
Confirmed incidents in which employees were dismissed or disciplined for corruption	Number	0	0	0
Confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption	Number	0	0	0
Public legal cases regarding corruption brought against Nomad or its employees	Number	0	0	0
Legal actions pending or completed during the reporting period regarding anti-competitive behaviour and violations or anti-trust and monopoly legislation	Number	0	0	0
Number of whistleblower reports received	Number	-	2	0

BETTER SOURCING

Fish and Seafood	Unit	2020	2021	2022
MSC- or ASC- certified products across our global portfolio	Number	834	883	940
Nomad Foods sales volume that is MSC or ASC labelled	%	95	95.5	96.5
Purchased fish and seafood volume that is MSC- or ASC- certified	%	96	98	98.9
Purchased wild capture fish and seafood volume that is MSC-certified	%	97	98	99
Purchased farmed fish and seafood volume that is ASC-certified	%	82	96	95.5
Market where fish provenance tool has been implemented	Number	8	10	10

Crops		2020**		
Vegetables produced using sustainable farming practices*	%	77	88.09	90.8
Purchased volume of palm oil for in-house production which is verified by standard	%	99.3	100	99.9
RSPO-Certified segregated	%	99.1	100	99.4
RSPO-Mass balance	%	0.1	0	0.6
Purchased volume of palm oil that is uncertified	%	0.8	0	0.008
Purchased volume of soy footprint which is "responsible" as per policy***	%	12	17	24

*Defined as contracted suppliers that achieved FSA silver level, and bulk & co-pack that achieved FSA silver level after self-assessment
**2020 data reflects only volumes purchased for in-house production+
*** as outlined earlier in the report we purchase soy credits to cover remaining volumes

Animal Protein				
Purchased volume of poultry from non-cage reared chickens	%	100	100	100
Percentage of egg volume from non-cage reared chickens	%	92	100	100
Total purchased volume of animals	Tons	146,167.5	146,654	137,538
Purchased volume that is fish and seafood	%	73.7	74.2	73.3
Purchased volume that is poultry	%	16.8	17	17.5
Purchased volume that is red meat	%	9.6	8.8	9.2

Social impact of supply chain	Unit	2020	2021	2022
Tier 1 suppliers registered with Sedex	%	95	95	95
Percentage or tier 1 suppliers risk-assessed against Code of Conduct and Ethical criteria	%	-	100	100
New suppliers (including indirect suppliers) that were screened using social criteria	%	100	100	100
Number of audits of ethical standards completed for priority suppliers	Number	-	131	125

BETTER NUTRITION

Health and nutrition				
Percentage of total net sales from branded products assessed and classified as Healthier Meal Choices	%	90.0	91.5	93.3
New product innovations that are assessed and classified as a Healthier Meal Choice	%	95	95	97
Percentage of total net sales from nutritionally optimised non-HMC products as a % of total non-HMC net sales	%	8.0	9.5	6.6
Percentage of total net sales from branded nutritionally optimised products	%	-	-	8.4
Percentage of total volumes from branded nutritionally optimised products	%	-	-	7.5
Adriatic business innovations that are assessed and classified as a Healthier Meal Choice	%	-	-	0

Additives				
Branded products without flavour enhancers, artificial flavours and artificial	%	97	98	99

Product safety and quality				
Supplying sites within Nomad Foods supply chain operating to an international safety system	%	98.5	98	95
Incidents concerning food safety and quality	Number	4	10	14

BETTER OPERATIONS

GHG emissions	Unit	2019 (SBT base-line year)	2020	2021	2022 Nomad Foods legacy	2022 Findus Switzerland	2022 Adriatics	2022 Nomad Foods total
Scope 1 GHG emissions	kilotons CO2e	67.3	92.48	91.97	85.21	0.63	28.44	114.28
Scope 2 GHG emissions*	kilotons CO2e	47.5	16.73	7.04	0.04	0.06	20.31	20.41
Scope 3 GHG emissions	kilotons CO2e	223.0	192.11	191.01	173.55	1.93	142.95	318.43
GHG emissions intensity	kgCO2e per ton of finished goods	614.5	484.7	479.6	467.8	553.3	1,566.8	668.8

100% market-based

Waste & Materials for re-use	Unit	2020	2021	2022 Nomad Foods legacy	2022 Findus Switzerland	2022 Adriatics	2022 Nomad Foods total
Volume of waste materials by waste type*	Tons	54,683	52,557	46,738	317	8,889	55,944
Edible food waste	%	35.9	37.17	37.5	71.3	69.3	42.7
Inedible food waste	%	29.5	27.26	27.7	0.0	1.6	23.4
Packaging waste	%	25.3	26.06	25.7	11.6	19.8	24.7
Rest of non-hazardous waste	%	9.0	9.16	8.6	16.0	7.7	8.5
Hazardous waste	%	0.3	0.35	0.6	1.1	1.5	0.7
Weight of hazardous waste	Tons	151.9	186.3	263	3.5	133.7	400.1
Weight of non-hazardous waste by disposal method	Tons	54,531	52,371	46,463	314	8,752	55,529
Closed loop	%	39.8	43.02	50.8	87.6	84.7	56.4
Open loop	%	50.2	48.56	42.0	0.0	8.8	36.5
Incineration for energy recovery	%	7.9	6.96	6.0	12.4	0.003	5.1
Incineration without energy recovery	%	0.0	0.01	0.001	0.0	0.0	0.001
Landfill	%	2.1	1.45	1.2	0.0	6.5	2.0
Sewers	%	0.0	0.0	0.0	0.0	0.0	0.0
Meal equivalents of food given to food banks	Meal equivalents	1,700,000	668,347	869,588.82	28,572.00	n/a	898,160.82
Markets where Nomad Foods is engaged in reducing waste, e.g. through donations to food banks or charities	Number	13	11	12	1	n/a	13

* Edible food waste is food disposed of that was edible for human consumption prior to disposal. Inedible food waste covers materials arising from food or drink preparation that is not edible under normal circumstances (e.g. red cabbage stems, pea pods, leaves, potato peeling). Any materials that are repurposed for animal feed and surplus food (sent to food charities) are neither considered waste, nor included in waste reporting.

Food Loss and Waste		2020		2021		2022 Nomad Foods legacy		Findus Switzerland		Adriatics		Nomad Foods total	
	Unit	Ton	%	Ton	%	Ton	%	Ton	%	Ton	%	Ton	%
Edible Food Loss	tons & %	16,765.1	2.8	15,283.5	2.6	12,363.5	2.3	0.0	0.0	1,205.5	1.8	13,569.0	2.2
Inedible Food Loss	tons & %	7,535.0	1.2	7,767.3	1.3	6,916.0	1.3	0.0	0.0	0.0	0.0	6,916.0	1.1
Edible & inedible Food Loss	tons & %	24,300.1	4.0	23,050.8	3.9	19,279.5	3.6	0.0	0.0	1,205.5	1.8	20,484.9	3.4
Edible Food Waste	Unit	20,478.4	3.4	19,534.8	3.3	17,508.5	3.3	226.0	5.2	6,163.9	9.0	23,898.4	3.9
Inedible Food Waste	Unit	16,128.3	2.7	14,329.4	2.4	12,947.0	2.4	0.0	0.0	139.2	0.2	13,086.2	2.2
Edible & Inedible Food Waste	Unit	36,606.7	6.0	33,864.2	5.7	30,455.6	5.7	226.0	5.2	6,303.0	9.2	36,984.6	6.1
Edible Food Loss & Waste	tons & %	37,243.5	6.1	34,818.3	5.9	29,872.0	5.6	226.0	5.2	7,369.4	10.8	37,467.3	6.2
Inedible Food Loss & Waste	tons & %	23,663.3	3.9	22,096.7	3.8	19,863.0	3.7	0.0	0.0	139.2	0.2	20,002.2	3.3
Edible & Inedible Food Loss & Waste	tons & %	60,906.8	10.1	56,915.0	9.7	49,735.0	9.3	226.0	5.2	7,508.5	11.0	57,469.5	9.4

Energy	Unit	2020	2021	2022 Nomad Foods legacy	Findus Switzerland	Adriatics	Nomad Foods total
Total fuel consumption from non-renewable sources, broken down by fuel type	kWh	440,352,559	444,962,250	405,702,875.4	3,053,360.4	20,948,052.2	429,704,288.1
Natural gas	%	97.5	97.6	95.8	99.9	90.9	95.6
Diesel	%	0.6	0.7	2.5	0.0	5.9	2.6
Petrol	%	0.0	0.0	0.0	0.01	0.1	0.01
Propane (owned or controlled by Nomad)	%	1.9	1.7	1.7	0.0	2.5	1.7
LPG	%	0.0	0.0	0.0	0.0	0.6	0.03
Total energy consumption from renewable sources, broken down by source*	kWh	113,774,166	154,777,593	166,813,086	0.0	0.0	166,813,086
Wind	%	43.4	20.1	35.5	0.0	0.0	35.5
Hydro	%	32.3	48.1	43.6	0.0	0.0	43.6
Solar	%	0.9	2.8	2.8	0.0	0.0	2.8
Biomass	%	23.3	25.7	14.5	0.0	0.0	14.5
Unspecified / other	%	0.2	3.3	3.6	0.0	0.0	3.6
Total scope 2 energy consumption by energy source**	kWh	188,349,641	188,343,508	167,062,925.6	4,204,897.0	41,334,495.7	212,602,318.3
Grid-supplied electricity generated from a variety of fuel mixes	%	39.5	17.7	0.0	100	85.6	18.6
Renewable energy self-generated or purchased	%	60.3	82.2	99.9	0.0	0.0	78.5
Purchased steam	%	0.0	0.0	0.0	0.0	14.4	2.8
District heating	%	0.1	0.1	0.1	0.0	0.0	0.1

* Excludes biogas and wooden pellets for heating
**The scope of this row was incorrectly reported in 2020

Water

	Unit	2020	2021	2022 Nomad Foods legacy	Findus Switzerland	Adriatics	Nomad Foods total
Volume of fresh water consumption, by source	m3	5,185,407	5,956,822	4,920,606	34,547	641,659	5,596,812
Well	%	65.1	69.4	67	100	76	68
Municipality	%	34.9	30.6	33	0	24	32
Volume of effluent water discharged	m3	4,321,274	4,431,797	3,900,973	27,642	569,564	4,498,178

Packaging Lifecycle	Unit	2020	2021	2022
Packaging material that is recyclable	%	83.4	90.36	96.5
Packaging material that is renewable	%	47.2	61.2	62.1

Employee Health & Safety*	Unit			2021**
Lost time injury frequency rate	Number of lost-time injuries per million hours worked	7.56	7.39	4.49
Number of fatalities as a result of work-related injury	Number	0	0	0
Rate of fatalities as a result of work-related injuries	Number of fatalities per million hours worked	0	0	0
Number of high consequence work-related injuries	Number	0	0	0
Rate of high consequence work-related injuries	Number of high-consequence injuries per million hours worked	0	0	0
Number of total recordable work-related injuries	Number	73	71	39
Rate of total recordable work-related injuries	Number of recordable injuries per million hours worked	9.52	8.33	4.9

*All data refers to factory employees only. Data from 2019 and 2020 was incorrectly reported.
**Data for 2021 includes Findus Switzerland but excludes Fortenova Frozen

Employee Wellbeing and Development			2020*	
Total employees participating in engagement survey	%	90	81	75**
Scores in engagement survey				
Sustainable engagement score	Number	90	85	81
Wellbeing, health & safety score	Number	87	78	78

*Due to Covid-19 we were unable to run surveys with our factory (non-office) employees in 2020
**Figure is an approximation due to difficulties calculating the response rate without our Adriatics business

Diversity, equity and inclusion	Unit	2020	2021	2022
Gender distribution amongst employees				
Female	%	35.9	36.0	31.9
Male	%	64.1	64.0	68.2
Gender distribution amongst employees by work level* - Female				
1	%	34.4	34.0	52.7
2	%	45.7	46.0	46.3
3	%	31.4	36.0	35.7
4-7*	%	28.2	28.0	25.3
Gender distribution amongst employees by work level* - Male				
1	%	65.6	66.0	47.3
2	%	54.3	54.0	53.7
3	%	68.6	64.0	64.3
4-7*	%	71.8	72.0	74.7
Age distribution across employees				
Under 30 years old	%	-	12.1	15.4
30-50 years old	%	-	50.5	49.1
Over 50 years old	%	-	36.5	35.5
Number of employees who have attended inclusive hiring training	Number	-	164	132

* Examples of roles at each work level (WL): WL1 & WL2 = e.g., administration, factory worker, professional junior manager; WL3 = e.g., Manager, Head of; WL4-7 = e.g. Executive Committee and Enterprise Leadership

The reported total CO2eq emissions were confirmed with reasonable assurance by GUTcert, an accredited verification body and member of the AFNOR Group. The scope of GUTcert's verification includes scope 1, scope 2 and scope 3 of the Greenhouse Gas Protocol "A Corporate Accounting and Reporting Standard" and GUTcert's procedure is based on ISO 14064-3, taking into account ISO 14064-1 and ISO TR 14069.

GRI Index

GRI Standard	Description	Location
2-1 [Organisational details]	Legal name of the organisation	Annual report
	Nature of ownership and legal form	Annual report
	Location of headquarters	Nomad Foods at a Glance
	Countries of operation	Nomad Foods at a Glance
2-2 [Entities included in the organisation's sustainability reporting]	Entities included in sustainability reporting	Nomad Foods at a Glance
	Approach to consolidating information across multiple entities	Nomad Foods at a Glance
2.3 [Reporting period, frequency and contact point]	Reporting period	About this Report
	Contact point	Back page
2.4 [Restatements of information]	Restatements of information	See footnotes in data tables
2.5 [External assurance]	External assurance	Governance
2.6 [Activities and workers]	Sector	Nomad Foods at a Glance
	Value chain	Nomad Foods at a Glance
	Business relationships	Risk and Resilience
2.7 [Employees]	Total number of employees	Data Tables
2.9 [Governance structure and composition]	Governance structure	Governance
	Gender composition of the highest governance body	Diversity, Equity and Inclusio
2-12 [Role of the highest governance body in overseeing the management of impacts]	Role of the highest governance body and senior executives	Governance
2-13 [Delegation of responsibility for managing impacts]	Delegation of responsibility for managing impacts	Governance
2-22 [Statement on sustainable development strategy]	Statement on sustainable development strategy	CEO foreword Sustainability Strategy
2-23 [Policy commitments]	Policy commitments for responsible business conduct	Governance Corporate governance
2-24 [Embedding policy commitments]	Embedding policy commitments for responsible business conduct	Governance

GRI Standard	Description	Location
2-26 [Mechanisms for seeking advice and raising concerns]	Mechanisms for seeking advice and raising concerns	Governance
2-29 [Approach to stakeholder engagement]	Approach to stakeholder engagement	Stakeholder engagement process

MATERIAL TOPICS

GRI 3: Material Topics 2021

GRI Standard	Description	Location
3-1 [Process to determine material topics]	Process to determine material topics	Approach to Materiality
	Stakeholders and experts informing process to determine material topics	Approach to Materiality
3-2 [List of material topics]	List of material topics	Approach to Materiality
	Change to material topics	Approach to Materiality

SECTOR SPECIFIC DISCLOSURES

GRI 205: Anti-corruption 2016

GRI Standard	Description	Location
3-3	Management approach	Governance
205-3	Confirmed incidents of corruption and actions taken	Data Tables

GRI 205: Anti-competitive behaviour 2016

GRI Standard	Description	Location
3-3	Management approach	Governance
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	Data Tables

GRI 207: Tax 2019

GRI Standard	Description	Location
207-1	Approach to tax	Governance Annual report

GRI 301: Materials 2016

GRI Standard	Description	Location
3-3	Management approach	Packaging Life-cycle

GRI 302: Energy 2016

GRI Standard	Description	Location
3-3	Management approach	Greenhouse Gas Emissions

GRI Standard	Description	Location
GRI 303: Water and Effluents 2018		
3-3	Management approach	Greenhouse Gas Emissions Data Tables
GRI 305: Emissions 2016		
3-3	Management approach	Greenhouse Gas Emissions Data Tables
305-1	Direct (Scope 1) GHG emissions	Greenhouse Gas Emissions Data Tables
305-2	Energy indirect (Scope 2) GHG emissions	Greenhouse Gas Emissions Data Tables
305-3	Other indirect (Scope 3) GHG emissions	Greenhouse Gas Emissions Data Tables
305-4	GHG emissions intensity	Greenhouse Gas Emissions Data Tables
GRI 306: Waste 2020		
3-3	Management approach	Greenhouse Gas Emissions Data Tables
306-2	Management of significant waste related impacts	Greenhouse Gas Emissions Packaging Life-cycle
306-3	Waste generated	Data Tables
GRI 403: Occupational health and safety 2018		
3-3	Management approach	Employee Health and Safety Data Tables
403-9	Work-related injuries	Employee Health and Safety Data Tables
GRI 404: Training and education 2016		
3-3	Management approach	Employee Wellbeing and Development Data Tables
404-2	Programmes for upgrading employee skills and transition assistance programmes	Employee Wellbeing and Development

GRI Standard	Description	Location
GRI 405: Diversity and equal opportunity 2016		
3-3	Management approach	Diversity, Equity and Inclusion Data Tables
405-1	Diversity of governance bodies and employees	Diversity, Equity and Inclusion Data Tables
GRI 414: Supplier social assessment 2016		
3-3	Management approach	Social Impact of Supply Chain Data Tables
414-1	New suppliers that were screened using social criteria	Data Tables
GRI 416: Customer health and safety 2016		
3-3	Management approach	Product Safety and Quality Data Tables

OTHER MATERIAL TOPICS

Sourcing: Fish and Seafood		
3-3	Management approach	Fish and Seafood Data Tables
Sourcing: Crops		
3-3	Management approach	Crops Data Tables
Sourcing: Animal Protein		
3-3	Management approach	Animal Protein Data Tables
Sourcing: Health and Nutrition		
3-3	Management approach	Health and Nutrition Data Tables
Sourcing: Additives		
3-3	Management approach	Additives Data Tables
Sourcing: Responsible Marketing		
3-3	Management approach	Responsible Marketing

To find out more about Nomad Foods, visit nomadfoods.com

Nomad Foods