

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

Introduction

This statement constitutes

- a) the Modern Slavery Act Transparency Statement for Nomad Foods Europe Limited (“**Nomad**”), and Birds Eye Limited (“**Birds Eye**”) for the financial year ending 31 December 2022, made pursuant to section 54 (part 6) of the UK Modern Slavery Act 2015, and has been approved by the board of each company on 30 June 2023 (for Nomad), and 30 June 2023 (for Birds Eye); and
- b) an account of due diligence for Findus Norge AS (“**Findus**”) for the financial year ending 31 December 2022, made pursuant to section 5 of the Norwegian Transparency Act (åpenhetsloven) 2022, and has been approved by the board on 29 June 2023.

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

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

This statement sets out the actions taken to evaluate and understand potential modern slavery risks and other risks of human rights violations pertaining to the business of the Reporting Companies and their respective supply chains as well as measures put in place to mitigate the possibility of occurrence of slavery, human trafficking and other human rights violations in our business and supply chains. As the majority of our procurement is centralised, any risks apply to the whole business and mitigation measures are put in place across the group.

Our Approach, Policies and Procedures

We recognise that the supply chain of food production and processing is one of the sectors which may be vulnerable to modern slavery and other human rights violations, particularly due to the global nature of suppliers. The broad scope of our suppliers, which varies from small traders to large multinational companies located in all continents, means that significant effort and dedication is required in order to manage business, health and sustainability issues. The Nomad Foods Group has made it a goal to take up an active role in ensuring that such responsibility is acted on, in accordance with our standards. Our Group Ethical Compliance Manager is responsible for making sure that our suppliers meet our expectations on all issues surrounding human rights as outlined in our *Supplier Code of Conduct*. The Ethical Roadmap identified the priorities for the next years and was signed off by the Sustainability Steering Committee in 2019. Our Ethical Compliance programme in line with these priorities is reviewed on an annual basis.

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

These policies include:

1. *Supplier Code of Conduct*: This Code was reviewed and rolled out again in 2022. It contains the basic principles of what we expect from suppliers of goods and services to the Nomad Foods Group and the minimum legal and ethical requirements they need to meet. These obligations require our suppliers to prevent occurrences of modern slavery in their supply chain and state the specific human rights, labour and social laws, regulations and international conventions which they must abide by. The *Supplier Code of Conduct* replaced our *Ethical Trading Code of Practice*, which was introduced in 2014. Compliance with our *Supplier Code of Conduct* is mandatory for our suppliers. A copy of the Code can be found on our website. We have identified the salient human rights issues to Nomad as a food business, they are:
 - Harassment and inhumane treatment
 - Forced labour
 - Discrimination
 - Wages
 - Working hours
 - Freedom of association
 - Health & Safety
2. *Code of Business Principles*: This Code, last revised in 2020, sets out our ethical standards and the manner in which we behave as an organisation, our responsibilities, and how we expect our directors and employees to act. It can also be found on our website.
3. *Anti-Slavery Policy*: This policy further supplements our *Code of Business Principles* and sets out our commitment to implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

4. *Recruitment Policy*: We operate a robust recruitment policy and conduct eligibility evaluations, designed to safeguard against human trafficking (or individuals being forced to work against their will) by ensuring applicants are entitled to work in their country of employment.
5. *Whistleblowing Policy*: This measure instils a culture whereby all employees can feel free to raise concerns about how colleagues are being treated or in connection with practices within our business or supply chain which they suspect breach our Code of Business Principles or Supplier Code of Conduct, without fear of reprisals. Concerns can be raised internally within the business or via an independent third-party reporting hotline. The reporting hotline can also be used by our suppliers to raise concerns, and suppliers are made aware of the reporting hotline in the Supplier Code of Conduct.

Alongside these policies are the following procedures:

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

Suppliers & Own Operations

The Reporting Companies have an ongoing commitment to engaging only those suppliers that uphold the same principles as our operations and, where necessary, ensure the implementation of corrective measures. In the event that a supplier fails to take steps to cease or prevent adverse human rights impacts, the relevant Reporting Company will examine its business relationship with such supplier with a view to remedying the situation.

In 2022, the Nomad Foods Group continued to deploy its own supplier questionnaire, which is used (amongst other things) to review the status of suppliers' ethical trading standards. It is our goal to collate such data on an annual basis, so that we can be in a position to hold the latest and best information from our supply base. This information is used to conduct risk assessments and focus the efforts of our auditing programme.

To support this, the Nomad Foods Group is an AB member of the Supplier Ethical Data Exchange ("SEDEX"), which is a web-based system that allows us to share and view data on ethical and responsible business practices of other SEDEX member companies, including information on labour standards, health and safety, the environment and business ethics.

We see SEDEX as an important part of our responsible sourcing practices and we are working to ensure that all of our suppliers also register as B members of SEDEX and complete a self-

audit questionnaire on the SEDEX database. We have the same requirement for our own operations. Using this information, we have the ability to identify suppliers from whom we consider that an independent ethical audit report (such as SEDEX Members Ethical Trade Audit standard or similar) may be desirable and request its submission for review.

Like many businesses, the Covid-19 pandemic and inflation has affected our supply chain in a number of ways, which has led to some challenges but in the last year we have maintained the number of suppliers registered on SEDEX at 95%. This included the integration of one of our recent acquisitions, Findus Switzerland. In 2023, our aim is to maintain the SEDEX registration at 95% of our suppliers in the existing Nomad businesses.

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

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

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

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

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

In 2022, the audit programme included 33 sites that were classified as high-risk and 38 strategic suppliers from our supply chain, as part of our plans to mitigate any potential human rights risks. In total 125 third party ethical audits were completed in 2022, which exceeded the original plans for the year. The most common non-compliances identified were health & safety and excessive working hours or overtime, in line with the salient human rights issues identified by us. To remediate the non-compliances found, corrective action plans were put in place for the necessary sites. This was to ensure the non-compliances were resolved and verified by the audit company within the given timelines for each issue found. The verification method will depend on the type of non-compliances, some can be closed off by desktop review whilst others will require a follow-up audit. We support our suppliers through the remediation process and regularly check in to understand progress or any potential delays. However, if the supplier fails to commit to completing the corrective action plan, then another option for remediation is to source from an alternative supplier that is committed to and meets our requirements. This is a last resort as our aim is to support our suppliers on the journey of continuous improvement which in turn should have a positive impact on the workers in our supply chain.

Training, Engagement and Resourcing

In order to ensure that all our key staff understand and are aware of the risks of modern slavery and human rights violations and can assist us in its prevention, both in our business and in our supply chain, training continues to be provided to our Management Team, Sustainability Team, Procurement Team, Supplier Assurance Team and other relevant colleagues. This continuing training programme includes an introduction to ethical compliance, which outlines the basics about modern slavery and examples of ethical issues within the supply chain. The training also details the priorities and key activities within the Ethical Roadmap for the Reporting Companies.

In 2021, we developed the Introduction to Ethical Compliance training into an e-learning tool which is mandatory for existing employees and new starters in the Procurement, Supplier Assurance and R&D Teams. In 2022, 424 employees from across the business completed the mandatory training. In 2022, all new starters within the Procurement Team had an onboarding session which gave an introduction to ethical compliance issues, information on the Ethical Compliance programme and what is expected of them.

The Procurement, R&D and Quality Teams meet on a monthly basis with our Group Ethical Compliance Manager. These sessions are to update on progress, discuss risks or issues, align on decisions needed and highlight where escalation is required. The heads of the Procurement, R&D and Quality Teams also meet on a monthly basis and the Group Ethical Compliance Manager can escalate any highlighted risks or issues to this forum if required. When key risk are highlighted or decisions required, these are taken to the Sustainability Executive Committee. This forum meets at least twice a year and comprises of senior leaders within the Nomad business.

In 2022, the Sustainability team continued to raise awareness internally about modern slavery and marked Anti-Slavery Day on the 18th October by giving an update on the progress we have made in this area.

Responsibility and Effectiveness

Since the passing of the UK Modern Slavery Act in 2015, this is our sixth statement on compliance under this legislation. In 2017, as a newly formed group, we took significant actions and in 2018, our approach and endeavours continued to be refined in the context of our enlarged group. In 2019 a new role, Group Ethical Compliance Manager, was created to focus on this area and take further actions. In 2020 and 2021, we continued to progress with our 'Ethical Roadmap'. In 2022, the Ethical Compliance programme assessed and audited our supply chain despite the constraints of Covid-19 and inflation.

For 2023, Covid-19 and inflation may continue to pose disruptions to our supply chain but we are determined to continue driving progress on our Ethical Compliance programme.

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

Stéfan Descheemaeker*
Director
on behalf of Nomad Foods Europe Limited
Date: 30 June 2023

Christian Ardern*
Director
on behalf of Birds Eye Limited
Date: 30 June 2023

Kasper Grønnegaard, Suzanne Lindström, Stig Waage, Siri Berntsen, Christine Stensland and Erik Aunet*
Directors
on behalf of Findus Norge AS
Date: 29 June 2023

* Published online without a signature. The original version has been signed by the director(s).