

NOMAD FOODS EUROPE LIMITED

AND

BIRDS EYE LIMITED

UK MODERN SLAVERY ACT TRANSPARENCY STATEMENT

AND

FINDUS NORGE AS

NORWEGIAN TRANSPARENCY ACT STATEMENT

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 2025, 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 8th June 2026 (for Nomad), and 8th June 2026 (for Birds Eye); and
- b) an account of due diligence for Findus Norge AS (“**Findus**”) for the financial year ending 31 December 2025, made pursuant to section 5 of the Norwegian Transparency Act (åpenhetsloven) 2022, and has been approved by the board on 8th June 2026.

In the following, Nomad, Birds Eye and Findus are together referred to as the “Reporting Companies”.

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.

1. Nomad Foods and our supply chains

As the largest frozen food company in Europe, we own many loved brands such as Birds Eye, Findus, iglo, Ledo and Frikom. Headquartered in the UK, we generated €3 billion in net revenue in 2025.

Our global value chain

- **Fishing:** Wild fish sourced from the North Atlantic and Pacific. Farmed fish sourced from Vietnam.
- **Farming:** We work directly with around 500 farmers across 6 countries.
- **Suppliers:** Around 1,100 tier one suppliers
- **Nomad Foods:** 17 factories across 11 countries.
- **Customers (retailers/foodservice):** c.95,000 major retail supermarkets stock our products.
- **Consumers:** c.97.9m households can access our products

Our Vision

Our vision is to be the world's frozen food champion. We are realising this by manufacturing, selling and distributing a range of branded frozen food products across 22 European markets.

Our Purpose

Our purpose is clear: Making Mealtimes Better with the Goodness of Frozen Food. This drives everything we do. Our growth model shows how we translate our purpose into action as we work to deliver superior shareholder returns.



Our values

With more than 7,500 people working across 22 European markets, our purpose and value connect us together as One Nomad.



Our sustainability strategy – Appetite for a Better World

From responsible sourcing and reducing greenhouse gas emissions to making tasty, healthy food more accessible – sustainability is integrated into our business through our Appetite for a Better World strategy.

The strategy comprises three core pillars: Better Sourcing, Better Nutrition and Better Operations. It is delivered through ambitious programmes, credible targets and meaningful stakeholder engagement. By executing our strategy, we are not only meeting the needs of our stakeholders and the environment, but we are also making a targeted contribution to five UN SDGs:

- SDG 2: Zero Hunger
- SDG 12: Responsible Consumption and Production
- SDG 14: Life Below Water
- SDG 15: Life on Land
- SDG 17: Partnerships for the Goals



2. Human rights and modern slavery risks within our supply chains

Modern slavery takes various forms, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. This includes forced labour, child labour, human trafficking, and other forms of exploitation.

Respecting the human rights of people across our value chain is a key priority – from those who grow our food, to our employees, our consumers, and wider society. The complex nature of global agricultural and seafood supply chains means that the workers whom we rely on can be exposed to human rights risks, including human trafficking, child and forced labour, poor working and living conditions, long working hours, and low pay. These risks are greatest in countries with limited legal protections for workers, inconsistent enforcement of local laws, or sectors heavily reliant on unskilled migrant workers.

Using risk assessment, supply chain audit and country data we have identified our salient human rights risks as:

- Harassment and inhumane treatment
- Forced labour
- Discrimination
- Wages
- Working hours
- Freedom of association
- Health & safety

Understanding these risks enables us to develop the right approaches to identify, address and remediate them. We will continue to review the identified risk areas along with the changing external landscape.

3. Our policies and procedures

Human rights are an absolute and universal right. We are committed to respecting the human rights outlined in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. We are also committed to implementing the UN Guiding Principles on Business and Human Rights.

Taking proactive action to identify, address, and remediate any human rights risk and taking steps to ensure workers have decent working conditions can improve our impact on the communities where we work and is important to us.

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. Policies are developed by subject matter experts and approved by Group functional heads and a designated Policy Review Group committee. These policies include:

- [Code of Business Principles](#): This sets out our commitment to act fairly, ethically, and in line with our purpose. The Code applies to all Nomad Foods employees and other

staff, part-time, and permanent, as well as the Executive Committee and the Board of Directors. All employees upon joining Nomad Foods are asked to complete the Code of Business Principles training and commit to operate in accordance with these principles. The Code of Business Principles is published externally on our website <https://www.nomadfoods.com/investors/corporate-governance>.

- *[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. It sets out the expectations that suppliers respect human rights, and also covers our requirements in relation to fair business practices, trade regulation, environmental impacts, supply chain responsibility, and traceability. The Supplier Code of Conduct is published externally on our website <https://www.nomadfoods.com/supplier-information>.
- *Anti-Slavery Policy*: This policy further supplements our Supplier Code of Conduct and Code of Business Principles by setting 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.
- *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.
- *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 chains 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 line, [Safecall](#). The reporting hotline can also be used by our suppliers to raise concerns, and suppliers are made aware of the reporting line 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. This includes the classification of non-conformities, timescales for closure, actions required, and the non-conformities reporting process.

4. Governance

Good governance ensures we are accountable to our stakeholders and that material impacts, risks and opportunities are considered in decision making.

Mirroring our corporate governance practices (see our [annual report](#)), sustainability is overseen at Board level and embedded into functional teams.

Board of Directors

The Nominating and Corporate Governance Committee of the Board oversees corporate responsibility and sustainability risks. It provides guidance, periodically reviews sustainability strategies and initiatives and assesses management reports on sustainability performance and ESG disclosures.

Executive Committee

Chaired by our CEO, the committee formally reviews sustainability risks, strategies and performance.

Sustainability team

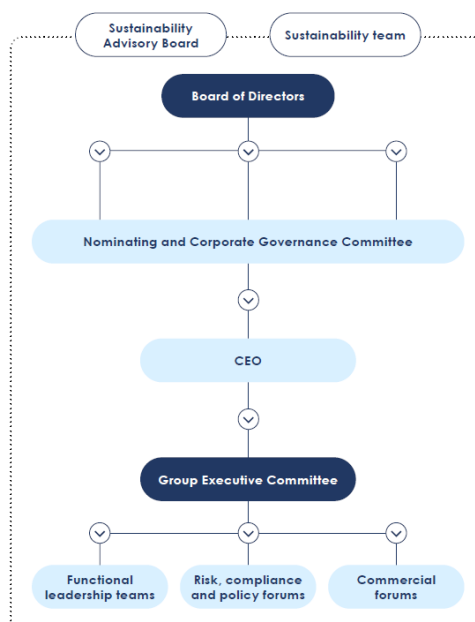
Led by our Group Head of Sustainability (who reports into our General Counsel), this central team leads strategy development, compliance monitoring, and reporting.

Functional delivery

ESG is integrated across key business functions – from innovation and sourcing to manufacturing, marketing and sales.

External Sustainability Advisory Board

Providing independent perspectives on our strategy and progress, the Advisory Board meets at least annually. In 2025, it comprised six sustainability experts from academia, the charity sector and our industry.



5. Respecting human rights within our operations and wider supply chain

Businesses must ensure that human rights are respected within their operations and wider supply chain. Policies play an important role; however, they are only the foundation and proactive due-diligence to ensure they are met is critical. Consequently, to enable us to identify and address any human rights shortfalls and monitor adherence to our policies within our supply chain, we have a risk-based monitoring programme in place, using the [Sedex](#) platform. The programme covers all our own sites, existing and new direct suppliers including co-packers. It is managed by our Group Ethical Manager, who works in close partnership with our Procurement and Supplier Assurance Teams and suppliers. The programme has four stages:

1. **Engagement** – Both existing and new suppliers must comply with our Supplier Code of Conduct which includes registering, linking, and completing the Self-Assessment Questionnaire (SAQ) on Sedex.
2. **Self-assessment** – The Sedex SAQ gathers information on suppliers, through asking questions relating to labour, health and safety, environment, and business ethics. Tier one Direct suppliers and our own operations must complete the Sedex SAQ and ensure this is reviewed periodically to ensure the information is up to date. This is important as it feeds into the site characteristic score in the Sedex Risk Assessment tool, which is a key part of identifying risks within our supply chains.

All of our own operations are registered on Sedex and 82% have fully completed the Sedex SAQ. The remaining three sites will complete the Sedex SAQ in the first half of 2026. The number of tier one Direct suppliers registered on Sedex for the total Group increased from 83% to 89% In 2026, our aim is to increase the Sedex registration to 95% of our suppliers. This will be achieved by continuing to work closely with our Adriatic procurement team and supporting suppliers through the registration process.

3. **Site risk assessment** – We risk assess our own sites and each supplier site using the Sedex risk assessment tool, 'Radar'. This considers site characteristics, the inherent risk and previous audit results to assign each site an overall risk score. This site characteristics score is primarily based on each supplier's answers to their SAQ. The inherent risk score uses country and sector risk indicators, based on third-party data. The overall assessment scores each supplier's risk across 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

In 2025, the risk assessment identified 150 high risk, 750 medium risk and 147 low risk supplier sites. There was an increase in the number of high-risk sites compared with 2023, when 131 were identified. The increase was due to supply base changes, and inclusion of suppliers from our Adriatic business into the risk assessment process. Our own operations were identified as either medium or low risk.

4. **Auditing and addressing non-conformities** – We use the output of the risk assessment to determine which sites require a third-party ethical audit to ensure compliance with the requirements in our Supplier Code of Conduct and applicable local law. High-risk sites are required to complete a third-party ethical audit which is uploaded onto Sedex. Our preferred format is a 4 pillar [Sedex Members Ethical Trade Audit](#) (SMETA) but we also accept specified alternatives. Audits are graded based on number, severity of non-conformities, and whether they are isolated or systemic, using our internal grading matrix. This grading determines audit frequency, ranging from every six months to two years. Suppliers that do not meet our requirements are expected to resolve any gaps or shortcomings within given timelines and this will be verified by the auditor, either through a follow up audit or a desktop review.

In 2025, we audited 150 supplier sites (32 co-packers, 105 raw material suppliers and 13 packaging suppliers) covering 114,773 workers. The majority (73) were in Europe, followed by Asia (52), South America (19) and North America/Africa (3 each). The increase in sites risk assessed as high-risk resulted in an increase in the total number of audits conducted versus 2024.

The audits identified 738 non-conformances. They comprised 39 at critical level, 406 high, 240 medium and 53 low. Of the total, 491 were closed out by year-end with the rest under corrective actions plans or pending auditor review. The most common drivers of non-compliance are Health & Safety and Working Hours, both of which are common in food supply chains and within the geographies we source from.

While these were all minor policy and procedural issues, rather than cases of poor treatment of workers or child labour, we identified 54 non-compliances across the categories of children and young workers, discipline and grievance, discrimination and freely chosen employment, of which 42 are already addressed.

We actively support suppliers in remediating non-conformities, using corrective action plans and regular check-ins 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 and compliance which in turn should have a positive impact on the workers in our supply chains.

Pilots to enhance our due-diligence activities

To explore how we strengthen our upstream human rights due-diligence, in 2025, we piloted the [diginexLUMEN](#) platform with a sample of our supply base. This human rights due diligence system provides:

- Algorithm-based risk scoring data to prioritise target areas;
- Self-assessments that are automatically scored with improvement plans generated, reducing audit burden;
- Data triangulation between the self-assessments and worker surveys to flag inconsistencies;
- Supply chain mapping for greater transparency and risk assessing of different tiers; and
- Customisable features.

The pilot covered 15 manufacturing sites across different buying categories, countries, risk and spend level. Overall, feedback from suppliers was positive and we plan to roll out the platform in our high-risk supply chains for enhanced due diligence.

We also collaborated with [Lloyd's Register Quality Assurance](#), [Conservation International](#) and [FishWise](#), to pilot a social responsibility assessment tool to identify and tackle worker rights and wellbeing risks in our fish and seafood supply chain.

Starting with four suppliers and processors in Vietnam, the pilot found overall positive performance with:

- All sites meeting or exceeding the living wage;
- Positive working conditions backed by certification and competition for workers;
- All workers being recruited directly (without brokers) and with written contracts in a language they understand;
- Active trade unions or worker committees being present with regular worker–management dialogue and workers able to freely raise issues;
- Strong occupational health, safety and diversity measures enforced; and
- Management understanding of international human rights standards.

Weaker performance was found in areas such as engagement with relevant stakeholders and formal grievance mechanisms. Given the valuable insight this tool provides around human rights risks and impacts, we aim to deploy it in wider sourcing regions going forward.

6. Training and engagement

To ensure 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 chains, 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. Our supply chain teams, including Procurement, RDQ and HR, have been engaged on the development and implementation of the Human Rights strategy.

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 RDQ Teams. To date, 410 employees from across the business have completed the mandatory training. Furthermore, all new starters within the Procurement Team had an onboarding session which provides an introduction to ethical compliance issues, information on the Ethical Compliance programme and what is expected of them.

The Procurement and RDQ Teams meet monthly 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. When key risks are highlighted or decisions required, these are taken to the Quarterly Executive Committee Sustainability review.

A quarterly KPI report is shared with the Procurement and RDQ Teams. This includes overall progress on KPI targets across audit scores, audit validity and overdue non-conformances. The report also breaks down performance, non-conformances, and improvement by each supplier category.

In 2025, the Sustainability Team continued to work closely with our Procurement function to embed human rights considerations into our internal Supplier Risk Dashboard, which is a tool used by our Procurement Team to aid sourcing decisions and strategies. The dashboard captures inherent sustainability risks at an overall and supplier level as well as the controls in place to mitigate these risks.

7. Partnerships & collaboration

Human rights issues are complex and often systemic in nature in many geographies and sectors of the global economy. Consequently, driving systematic change requires collaboration with a wider range of stakeholders. Some of our partnerships are listed below:

[Sedex](#)

We are a member of Sedex, a world leading web-based system, aiming to improve working conditions in global supply chains. Sedex is a collaborative database which enables the sharing of social and environmental data and information across different tiers of the supply chains. The system allows us to map, assess, analyse, and report on our supply chains to better understand and improve ethical performance.

[Seafood Ethics Action Alliance](#)

In 2023, we were proud to join the Seafood Ethics Action Alliance, an organisation designed to ensure seafood supply chains are ethical, through strengthening the human rights and due diligence processes carried out across seafood supply chains. Through the Alliance, we can engage with likeminded businesses to develop an industry-wide solution in the face of ever-evolving human rights risks and share knowledge and due diligence best practice approaches.

Food Network for Ethical Trade

In 2025, we joined the Food Network for Ethical Trade which is a member-led initiative which is committed to improving the lives and livelihoods of workers in food supply chains. FNET uses the collective leverage of suppliers and retailers to bring about positive change in working conditions.

8. Responsibility and effectiveness

Since the passing of the UK Modern Slavery Act in 2015, this is our tenth statement. Some of the actions taken and improvements made over the years are:

- The Group Ethical Manager role was created to focus and drive improvements in this area.
- The Ethical Roadmap was created to identify and support areas for action, including policies, introductory training for staff, risk assessment of supply chains and setting up our ethical audit programme.
- Acquisitions have been onboarded into due diligence programme alongside the legacy suppliers.
- There was a strategic review of our human rights programme with key enhancement activities identified, some of which have been implemented. This included enhancements to our risk-assessment processes and expanding our audit programme along with an audit grading matrix.

We recognise that the human rights landscape is changing rapidly, and there is a need to evolve our policies, procedures, and monitoring activities to strengthen our approach. Building on work started in 2023/24, our focus for 2026 will involve the delivery of associated enhancements identified in the strategic review and recommendations from recent pilot activities. This will include reviewing and updating our human rights policy, implementing Diginex within our upstream fish supply chain, a gap analysis against the Corporate Sustainability Due Diligence Directive, scaling our engagement with collaborative initiatives such as the SEA Alliance to tackle systemic, industry-wide issues, and conduct SMETA audits at all of our own operations.

Date: **8th June 2026**

Ruben Baldew*
Director
on behalf of Nomad Foods Europe Limited

Simon Ball*
Director
on behalf of Birds Eye Limited

Kasper Grønnegaard, Catrine Brauti, Yann Montalbot, Richard Blindheim, Jonas Almqvist*
Directors
on behalf of Findus Norge AS

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