

**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 2023, 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 11 July 2024 (for Nomad), and 11 July 2024 (for Birds Eye); and
- b) an account of due diligence for Findus Norge AS (“**Findus**”) for the financial year ending 31 December 2023, made pursuant to section 5 of the Norwegian Transparency Act (åpenhetsloven) 2022, and has been approved by the board on 28 June 2024.

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 chain**

Nomad Foods is Europe’s leading frozen food company, with a portfolio of iconic brands, including Birds Eye, Findus, iglo, Aunt Bessie’s, Goodfella’s, La Cocinera, Ledo and Frikom. Headquartered in the UK, we have over 7,800 employees, revenues of over €3 billion and operations in 22 markets. Our products now feature in over 22 million meals a day across Europe.

*Our operations*



## Our global value chain



### 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 position 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 key pillars: **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 the planet. Our focus is on healthy and sustainable diets. What is good for us and our consumers should also be good for the planet.

### **Our values**

Our values have been developed with care and in consultation with colleagues from every corner of Nomad Foods, working through what was important to us as a business and the fundamental behaviours and actions that we need to embed so that we continue to be successful. They align with our business direction, our purpose and our growth ambition. They are key to our culture and importantly because we have created them together, are relevant to every location, every function and every role.



We get it done  
as one team



We love  
our food



We are humble  
and ambitious



We care



We are  
accountable

### **Our sustainability strategy – Appetite for a Better World**

The way in which food is produced, packaged, shipped and eaten has a major impact on the health of people and the planet, accounting for over one-third of global greenhouse gas emissions<sup>1</sup>, 70% of global water usage<sup>2</sup> and being the number one driver of accelerating biodiversity loss<sup>3</sup>.

<sup>1</sup> **FAO News Article:** Food systems account for more than one third of global greenhouse gas emissions. <https://www.fao.org/family-farming/detail/en/c/1379538/>.

<sup>2</sup> **Ceres report, Feeding Ourselves Thirsty:** <https://www.ceres.org/resources/reports/feeding-ourselves-thirsty>.

<sup>3</sup> **Food system impacts on biodiversity loss:** UNEP UN Environment Programme <https://www.unep.org/resources/publication/food-system-impacts-biodiversity-loss>.

We believe the food industry has a pivotal role to play in transforming the food system to reduce pressure on resources and build resilience and inclusivity. This goes hand-in-hand with our purpose: Serving the World with Better Food.

We know that consumers, retailers and other stakeholders are increasingly asking for brands that are more sustainable. We are very proud that our brands are for mainstream consumers because that gives us an opportunity to make a huge difference. Put simply, we want to democratise sustainable eating. 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 Operations** and **Better Nutrition**.

 **Better Sourcing**

**Improving the sustainability of the ingredients that go into our much-loved brands**

-  Fish and seafood
-  Animal welfare
-  Agriculture
-  Social impact of supply chain

 **Better Nutrition**

**Making food that is nutritious and lower impact**

-  Health and nutrition
-  Responsibly marketing
-  Additives
-  Food safety and quality
-  Alternative protein

 **Better Operations**

**Producing our brands in a way that respects our people, the wider community and the planet**

-  Climate change and GHG emissions
-  Employee health, wellbeing and development
-  Waste and water
-  Diversity, equity and inclusion
-  Packaging
-  Foundations of sustainable business\*

\*Foundations of sustainable business includes sustainability risk and resilience, policy and corporate governance, bribery and corruption and ESG regulation and reporting, and is covered in this introductory section.

## 2. Human rights and modern slavery risks within our supply chain

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 supply 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 the salient human rights risks for Nomad Foods as a food business, they are:

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

Understanding our risks helps us develop our approach and identify areas of priority. 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 of critical importance 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 signed off 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 confirm that they have read 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 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 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

Strong governance is essential for creating a resilient business and delivering on our sustainability strategy. 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 [2023 Annual Report](#).

We also have a robust sustainability governance model to ensure that sustainability matters including climate change, human rights, sustainable sourcing, packaging, water and waste are considered and embedded into our decision making and ways of working.



### **Board oversight**

Our Nominating and Corporate Governance Committee is responsible for overseeing matters relating to corporate responsibility and sustainability affecting our business on behalf of the Board of Directors. They oversee, provide guidance and periodically review our sustainability strategies and initiatives, including reports from management on our sustainability programmes, performance and Environment, Social and Governance (ESG) disclosures, recommending changes as necessary. The Nominating and Corporate Governance Board Committee Charter can be found [here](#).

### **Management oversight**

Managerial oversight of sustainability is provided by the Executive Committee of Nomad Foods chaired by the Group CEO. Formal quarterly sustainability reviews with the Executive Committee take place where sustainability risks, strategies and performance are reviewed. The Group Corporate Affairs and Sustainability Team, headed up by the Group Corporate

Affairs & Sustainability Director who reports directly into the Group CEO, leads strategy development, compliance monitoring and reporting. We also have an external Sustainability Advisory Board which provides an independent perspective on our strategy and progress and meets at least annually.

### **Operational oversight**

At an operational level, sustainability is embedded into key business processes, forums and functional leadership teams to lead the implementation of our sustainability activities through our innovation, sourcing, manufacturing, marketing and sales activities.

## **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 existing and new Direct suppliers including co-packers. It is managed by our Group Ethical Manager, who works in close partnership with our Procurement Team 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 1 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 chain.

We have maintained the number of tier 1 Direct suppliers registered on Sedex at 95%. This included the integration of Findus Switzerland, one of our recent acquisitions. In 2024, our aim is to maintain the Sedex registration at 95% of our suppliers (excluding the Adriatics).

3. **Site risk assessment** – We risk assess each supplier site using the Sedex risk assessment tool, 'Radar'. This considers site characteristics and the inherent risk 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 2023, the risk assessment identified 71 high risk, 853 medium risk and 167 low risk sites. There was a reduction in the number of high risk sites compared with 2022, when 174 were identified. The reduction was due to supply base changes or de-risking the supply chain.

4. **Auditing and addressing non-conformities** – We use the output of the risk assessment as well as the strategic importance of suppliers 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. A supplier could be deemed “strategic” due to high spend, number of products supplied or importance of category or product to the business. High-risk and strategic 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 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 2023, we audited 41 supplier sites (7 co-packers and 34 raw material suppliers) covering over 45,000 workers. This was a decrease in the number of total audits conducted in the previous year as we prioritised our focus on auditing high risk sites only.



The audits identified 237 non-conformities of which 177 were successfully closed. The remaining 60 are pending auditor review and we are working on closing these off too. Of these 60 remaining non-conformities – nine are critical, 33 are major and 18 are minor. The most common drivers of non-conformance were health & safety and working hours issues, both of which are common in food supply chains and within the geographies we source from. The non-conformities in the areas child & young workers, employment is freely chosen and harsh treatment, were all minor. They were as a result of inadequate policies or procedures and have been subsequently closed off.



We support our suppliers through the process of remediating non-conformities 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 and compliance which in turn should have a positive impact on the workers in our supply chain.

## 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 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. To date, 396 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, R&D and Quality 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.

In 2023, the Sustainability Team worked closely with our Procurement function to embedding human rights considerations into our internal Supplier Risk Dashboard, which is a tool used by our Procurement Team to aid sourcing decisions and strategies. Two human rights indicators were included within the supplier related managed risk, which were the site risk score and ethical audit grade. This is the first time human rights indicators have been included alongside commercial data in the dashboard and these will be updated on a regular basis. We also continued to raise awareness internally about modern slavery and marked Anti-Slavery Day on the 18<sup>th</sup> October by providing an update on the progress we have made in this area.

### **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 chain. 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. As a result of joining, 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.

## 8. Responsibility and effectiveness

Since the passing of the UK Modern Slavery Act in 2015, this is our eighth statement. Over the years actions have been taken and improvements made. The Group Ethical Compliance 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. In 2023, we began to onboard the Adriatics supply chain into our supply chain monitoring programme following their acquisition. There was also a strategic review of our human rights programme with key activities identified and timescales for completion.

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, our focus for 2024 will involve the expected completion of our strategic review of our human rights programme and the delivery of associated enhancements. This will include reviewing and updating our human rights policies and standards, enhancing our risk-assessment processes, expanding our audit programme along with an audit grading matrix, exploring how we can increase human rights due diligence within our upstream fish supply chain, and scaling our engagement with collaborative initiatives such as the SEA Alliance to tackle systemic, industry-wide issues.

Stéfan Descheemaeker\*

Director

**on behalf of Nomad Foods Europe Limited**

Date: 11 July 2024

Shaun Smith\*

Director

**on behalf of Birds Eye Limited**

Date: 11 July 2024

Kasper Grønnegaard\*

Directors

**on behalf of Findus Norge AS**

Date: 28 June 2024

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