

**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 2024, 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 25<sup>th</sup> June 2025 (for Nomad), and 25<sup>th</sup> June 2025 (for Birds Eye); and
- b) an account of due diligence for Findus Norge AS (“**Findus**”) for the financial year ending 31 December 2024, made pursuant to section 5 of the Norwegian Transparency Act (åpenhetsloven) 2022, and has been approved by the board on 25<sup>th</sup> June 2025.

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

Nomad Foods is Europe's leading frozen food company, with a portfolio of iconic brands, including Birds Eye, Ledo, iglo, Findus and Frikom.

Headquartered in the UK, we employ over 8,000 people, generate more than €3 billion in revenue, and operate in 22 key markets. Our products feature in over 22 million meals a day across Europe.

We believe frozen food is perfectly positioned to meet consumer needs, offering great quality, taste, nutrition, convenience, value, and less food waste. Our brands have been at the heart of family life for decades, and we want them to remain favourites for generations to come. That's why we prioritise long-term business resilience by investing in our people, brands, and growth.

### *Our operations*



## *Our global value chain*

- **Fishing**: Wild fish sourced from the North Atlantic and Pacific. Farmed fish sourced from Vietnam.
- **Farming**: We work directly with >800 farmers across 6 countries.
- **Suppliers**: 1,566 packaging and ingredient suppliers and 238 third-party manufactures.
- **Nomad Foods**: 18 factories across 11 countries.
- **Logistics/Distribution**: Finished goods stored in over 70 warehouses and transported by truck over 25 million km.
- **Customers (retailers/foodservice)**: 600 customers from grocery retailers to foodservice providers.
- **Consumers**: 230m consumers every year enjoy our food, across 22 markets.

## *Our Vision*

We are at a pivotal moment as we celebrate ten years of Nomad Foods and questions start to be asked around where we want to be in ten years' time. Since 2015, we have acquired six frozen food businesses to create a consolidated frozen food portfolio with more than €3bn in net revenues. We are extremely proud of what we have achieved so far and uniquely positioned to lead the frozen food industry into the next decade. Therefore, we have an exciting new vision:

# To Be The World's Frozen Food Champion

## *Our Purpose*

As Europe's leading frozen food company, consumers are at the heart of our business, and we play a central role in their lives. Our brands have been part of family life for decades, and we are committed to ensuring they can be enjoyed for generations to come. We have therefore revised our purpose to reflect our main reason for being. Our new purpose, making mealtimes better with the goodness of frozen food, reflects the joy we bring to the meal occasion and our commitment to providing good food that is delicious, nourishing, sustainable, affordable and accessible to all:

# Making Mealtimes Better with the Goodness of Frozen Food

## ***Our Manifesto***

We believe that freezing is the ultimate way to keep food fresh.

We will champion delicious, affordable food that is full of goodness and crafted with healthy ingredients like Vegetables, Fish and Poultry.

We believe that frozen food has the unique ability to democratise good food.

We are committed to food that is free from artificial additives, nutritionally balanced and made with care.

We limit the impact our food has on the planet, whether through reducing food waste, sourcing responsibly or using less energy in freezing.

It's time for everyone to discover the wonderful benefits of frozen food.

Our vision and purpose are based on the fact that goodness is reassured at Nomad Foods: Good Food, Food for All, and an Appetite for a Better World.

### **Good Food**

At the heart of what we all do every day is making good food: Good for our consumers and good for the planet. Our focus is on enhancing taste and 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 convenience. 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 production supports both human and planetary health. Our focus is on promoting healthy, sustainable diets that benefit people and the environment alike.

## ***Our values***

Our values connect us together as one team. They create the mindset, behaviours and actions we need to thrive now and in the future. They have been created in partnership with teams from across Nomad Foods and are central to our culture, and because we have created them together, are relevant to every location, function, and 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. Food systems account for over one-third of global greenhouse gas emissions<sup>1</sup>, 70% of global water usage<sup>2</sup>, and are the number one driver of biodiversity loss<sup>3</sup>.

We believe the food industry plays a pivotal role in transforming the food system to ease pressure on resources while building resilience and inclusivity. This aligns closely with our purpose: Making Mealtimes Better with the Goodness of Frozen Food.

Consumers, retailers, and stakeholders are increasingly asking for brands that are more sustainable. As a company whose brands are accessible to mainstream consumers, we have a unique opportunity to influence everyday choices and promote sustainable lifestyles. Our goal is simple: to make sustainable eating accessible to all. We achieve this by focusing our efforts on the three core pillars of our Appetite for a Better World sustainability strategy:

---

<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>.



## Better Sourcing

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

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



## Better Nutrition

Making food that is nutritious and lower impact

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



## Better Operations

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

- Climate change and GHG emissions
- Waste and water
- Packaging
- Employee health, wellbeing and development
- Diversity, equity and inclusion
- 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 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 supply chains 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 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 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 confirm 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 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.

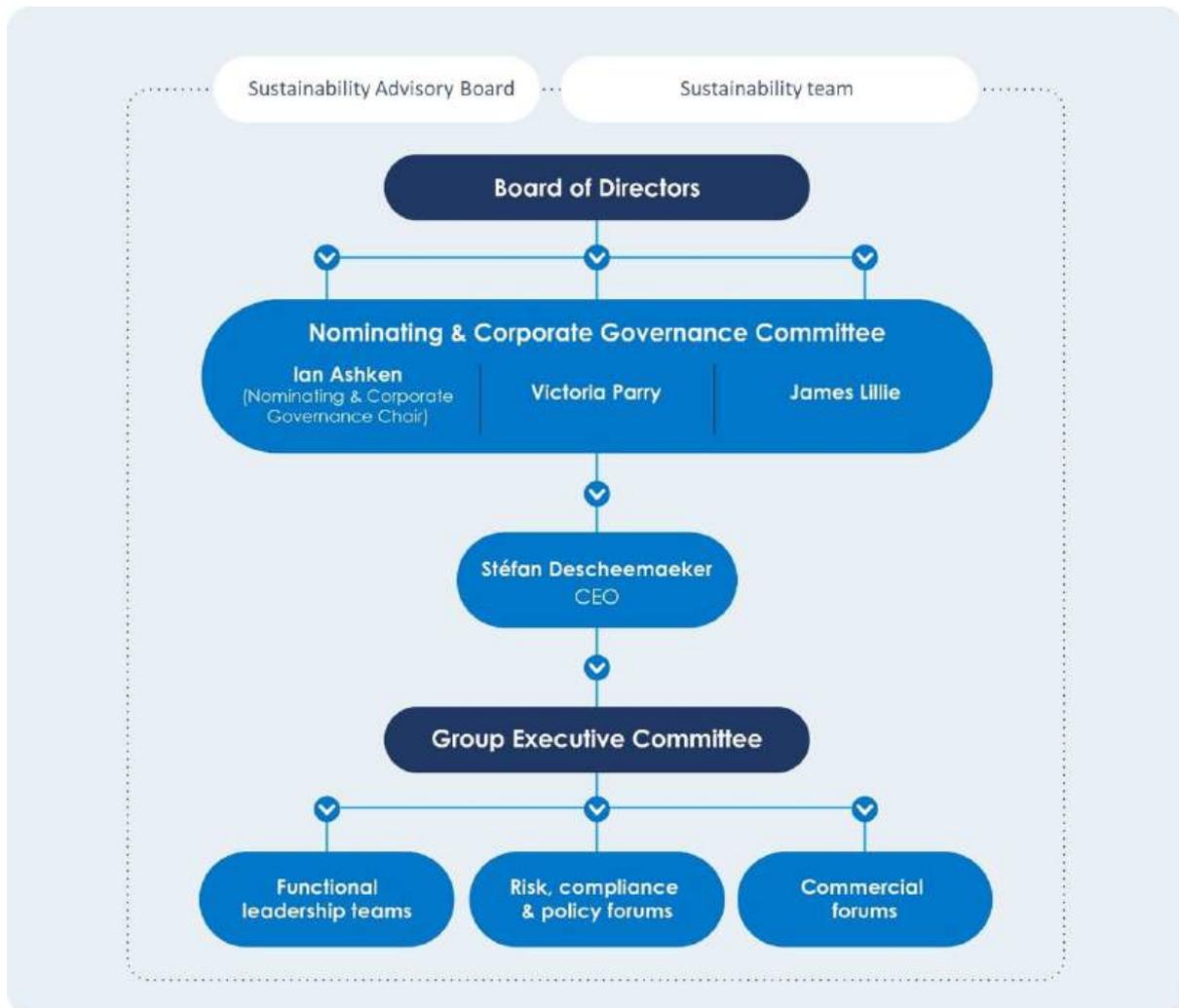
Alongside these policies are the following procedures:

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

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 2024 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. Quarterly sustainability reviews with the Executive Committee take place where sustainability risks, strategies and performance are reviewed. The Sustainability Team reports directly into the Group General Counsel who is on the Group Executive Committee, and 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 chains, 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 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 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 chains.

We have maintained the number of tier 1 Direct suppliers registered on Sedex at 95%. For the Adriatics, our most recent acquisition, 70% of tier Direct suppliers are registered on Sedex. In 2025, 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, 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 2024, the risk assessment identified 131 high risk, 666 medium risk and 167 low risk sites. There was an increase in the number of high-risk sites compared with 2023, when 71 were identified. The increase was due to supply base changes and changes to the risk assessment process.

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 Sedex Members Ethical Trade [Audit](#) 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 2024, we audited 110 supplier sites (28 co-packers, 75 raw material suppliers and 7 packaging suppliers) covering over 100,000 workers. The increase in sites risk assessed as high-risk resulted in an increase in the total number of audits conducted versus 2023.

The audits identified 403 non-conformities of which 192 were successfully closed. The remaining 211 are pending auditor review and we are working on closing these off. Of these 211 remaining non-conformities – 17 are critical, 118 are high, 63 are medium, and 13 are low. 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. We identified 16 non-compliances across the categories of Child & Young Workers, Employment is Freely Chosen, and Harsh Treatment. These were all minor policy and procedural issues rather than cases of poor treatment of workers.

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.

## **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. 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 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 2024, 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.

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 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. 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 ninth 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.

In 2024, we continued to onboard the Adriatics supply chain into our supply chain monitoring programme following their acquisition. 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 intention for 2025 is to involve the delivery of associated enhancements identified in the strategic review. Our plans include reviewing and updating our human rights policy, piloting alternative human rights due diligence approaches within our upstream fish supply chain, piloting an alternative human rights due diligence system, and scaling our engagement with collaborative initiatives such as the SEA Alliance to tackle systemic, industry-wide issues.

For more information on human rights in our supply chain and our future plans and targets, please see our Sustainability Report <https://www.nomadfoods.com/appetite-for-a-better-world/sustainability-reports/> including the section on forward-looking statements.

Date: **27<sup>th</sup> June 2025**

Stéfan Descheemaeker\*

Director

**on behalf of Nomad Foods Europe Limited**

Shaun Smith\*  
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).