

## NOMAD FOODS EUROPE LIMITED, BIRDS EYE LIMITED AND AUNT BESSIE'S LIMITED

### MODERN SLAVERY ACT TRANSPARENCY STATEMENT

#### Introduction

This statement is made pursuant to section 54 (part 6) of the Modern Slavery Act 2015 and constitutes the Modern Slavery Act Transparency Statement for Nomad Foods Europe Limited ("Nomad"), Birds Eye Limited ("Birds Eye") and Aunt Bessie's Limited ("Aunt Bessie's") for the financial year ending 31 December 2019 and has been approved by the board of each company on 8 June 2020 (for Nomad), 1 June 2020 (for Birds Eye) and 4 June 2020 (for Aunt Bessie's).

Nomad, Birds Eye and Aunt Bessie's are part of the Nomad Foods Group, Europe's biggest frozen food company producing, marketing and distributing branded frozen food products in 13 countries across Europe, employing over 4,300 people, with 15 factories. Core brands include Birds Eye, Findus, iglo, Aunt Bessie's and Goodfella's Pizza.

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 pertaining to the business of Nomad, Birds Eye and Aunt Bessie's and their respective supply chains as well as measures put in place to mitigate the possibility of occurrence of slavery and human trafficking in our business and supply chains.

#### Our Approach and Policies

We recognise that the supply chain of food production and processing is one of the sectors which may be vulnerable to modern slavery, 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. Although ultimately it is each supplier's responsibility to respect human rights and environmental 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. In 2019 we hired a dedicated Ethical Compliance Manager with the key responsibility for the group's obligations in this regard with regard to our Supplier Code of Conduct which all suppliers are required to adhere to. Later in 2019 the Ethical Roadmap which outlines the priorities for the next 3 years was signed off by the Sustainability Steering Committee.

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 and approved at director level.

These policies include:

1. **Supplier Code of Conduct:** This Code was launched and rolled out in 2018. It contains the basic principles of what we expect from both direct and indirect suppliers 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 the 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.
2. **Code of Business Principles:** This Code was revised and relaunched in March 2018 given the increased size and sophistication of the Nomad Foods Group and 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 be found on our website.
3. **Human Trafficking and 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 the United Kingdom.
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, without fear of reprisals. Concerns can be raised via an independent third-party hotline.

Alongside these policies are the following procedures:

1. **Supplier Onboarding:** Sustainability and Ethical was 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 within Sustainability.
3. **Non-Compliance Procedure:** This procedure outlines the approach and steps taken when a Sustainability related non-compliance is identified against the Supplier Code of Conduct or policy.

## Suppliers

Nomad, Birds Eye and Aunt Bessie's have an ongoing commitment to engaging only those suppliers that uphold the same principles as we do 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, Nomad, Birds Eye or Aunt Bessie's (as applicable) will examine its business relationship with such supplier with a view to remedying the situation.

In 2019, 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.

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.

We have increased the number of Nomad and Birds Eye suppliers registered with SEDEX to 76% (up from 60% in 2018). In 2020, our aim is to have 95% of our suppliers to all Nomad businesses (i.e. including the recently acquired Aunt Bessie's and Goodfella's) registered with SEDEX, allowing us to then focus on conducting additional risk assessments and further addressing any issues of non-compliance.

## **Training and Resourcing**

In order to ensure that all our key staff understand and are aware of the risks of modern slavery and human trafficking 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 and relevant members of the Supplier Assurance Team. In 2019 this continued training included an Introduction to Ethical training, which outlined the basics about modern slavery and examples of ethical issues within the supply chain. The training also detailed the priorities and key activities within the Ethical Roadmap for Nomad and Birds Eye.

The Procurement, R&D and Quality teams are engaged and updated on a monthly basis by the Ethical Compliance Manager. These sessions are to educate, align on decisions needed and gain feedback on proposed changes. When key decisions are required these are taken to the Sustainability Steering Committee which meets 3 times a year and comprises of senior leaders within the business.

## **Responsibility and Effectiveness**

Since the passing of the Modern Slavery Act in 2015, this is our fourth statement on compliance. 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, Ethical Compliance Manager, was created to focus on this area and take further actions. In 2020, we will continue to tackle the issue of modern slavery.

We recognise the importance of maintaining constant vigilance to identify and address any impacts associated with modern slavery and human trafficking 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 modern slavery and human trafficking on an annual basis.

Stefan Descheemaeker  
Director



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On behalf of Nomad Foods Europe Limited  
Date: 17 June 2020

Wayne Hudson  
Director

A handwritten signature in black ink, appearing to read 'Wayne Hudson', written in a cursive style.

On behalf of Birds Eye Limited and Aunt Bessie's Limited  
Date: 17 June 2020