

Responsible Marketing Principles



RESPONSIBLE MARKETING PRINCIPLES

As we work to build a **Better Tomorrow™**, these Responsible Marketing Principles guide our decisions in how we market our tobacco, nicotine and zero nicotine products and brands. We will uphold the same high standards in every market in which we operate, even when they are stricter than applicable local laws.

We believe tobacco and nicotine consumption is a choice for adults only. No one underage should ever smoke or use products containing tobacco or nicotine.

We understand the products we sell have different risk profiles, but that none of our products are risk free. We also know that potentially Reduced Risk Products*† can only maximise their potential to contribute to tobacco harm reduction if adult consumers have the information necessary to make informed choices. Therefore, it is essential we provide consumers with clear and meaningful information about our products.

All BAT companies, employees and anyone working on our behalf, in any capacity, must adopt these Marketing Principles and seek to apply them in good faith at all times.

Our Responsible Marketing Principles:

1. Our Products are intended for Adult Consumers
2. Our Marketing is targeted to Adult Consumers
3. We are committed to Underage Access Prevention
4. Our Marketing is honest and accurate
5. We inform Consumers that our Products are not risk free
6. We respect and comply with all applicable laws
7. We require our partners to market our Products responsibly

DEFINITIONS

Adult – A person who is at least 18 years old or, if higher, the minimum age in the relevant market for the lawful sale, purchase, possession, or consumption of the type of Products being sold or advertised.

Consumer – In relation to the Products, means an Adult tobacco or nicotine user.

Marketing – Any communication, activity, or branding (including Products and Packaging) for the purposes of advertising or promoting one of our Products to Adult Consumers.

Products – Any tobacco, nicotine or zero-nicotine product, regardless of the method of consumption, including devices necessary for the consumption of such products and related accessories. This definition does not include products which are:

- 1) Medicinal or smoking cessation products;
- 2) Non-inhalation products which do not contain nicotine or tobacco and which do not utilise a brand that is or has been used for tobacco or nicotine products; and
- 3) Sold by the Wellbeing & Stimulation business of BAT or BTV investee company.

Reduced Risk Product*† (RRP) – Products that present a potentially reduced risk of harm compared to smoking conventional cigarettes, including tobacco and herbal heating products, snus, moist snuff, chewing tobacco, tobacco or nicotine or zero nicotine pouches and nicotine or zero nicotine vapour products.

*Based on the weight of evidence and assuming a complete switch from cigarette smoking. These products are not risk free and are addictive.

† Our Vapour product Vuse (including Alto, Solo, Ciro and Vibe), and certain products, including Velo, Grizzly, Kodiak, and Camel Snus, which are sold in the U.S., are subject to FDA regulation and no reduced-risk claims will be made as to these products without agency clearance.

Underage – A person younger than 18 years old, or, if higher, younger than the minimum age in the relevant market for the lawful sale, purchase, possession, or consumption of the type of Products being sold or advertised.