Speaking Up (Whistleblowing)

We expect all our employees and business partners to act with integrity in accordance with the standards of behaviour described in our Code of Conduct. If you suspect that a breach of the law or of our Code of Conduct has taken place then we want you to speak up.

Our Code of Conduct is available on the intranet and at: www.imperialbrandsplc.com. You can email questions about the Code to Governance. Team@uk.imptob.com.

There are several avenues by which concerns can be raised:

1. Speaking Up Locally

If you feel comfortable doing so, you should raise your concerns with your people manager or with your local human resources team. We have processes to ensure that concerns are handled consistently across the business.

2. Speaking Up to our Senior Executives

If you do not feel comfortable raising your concerns locally, or if you have raised your concerns locally and believe that the local response is insufficient, then you can contact any one of the people below:

- the Company Secretary;
- the Group Financial Controller; or
- the Group Human Resources Director.

Phone: +44 (0)117 963 6636 and say it is a whistleblowing issue.

If you prefer to put your concern in writing that's fine, but it will help if you tell us how we can get back to you. You can post your letter to:

The Company Secretary,	Fax: +44 (0)117 966 7859
121 Winterstoke Road,	Email: whistle.blowing@uk.imptob.com.
Bristol BS3 2LL, United Kingdom	
Marked: 'Personal'	

3. Speaking Up by Using the Expolink External Hotline

You can also choose at any stage to raise your concerns using the entirely independent service provided by Expolink, who can be contacted by phone, email or web. Expolink will ensure that your concerns are quickly passed on to the right people:

- The Expolink Hotline operates 24 hours a day, 7 days a week (except 25 December). The phone number is different for each country. If you do not know the right number then see local notice boards or visit www.expolink.co.uk, www.expolink.co.uk, www.expolink.co.uk, www.expolink.co.uk,
- Reports can be emailed to Expolink at imperialtobacco@expolink.co.uk
- Web-based reports can be submitted from the Expolink website www.expolink.co.uk using the access code 'imperialtobacco'.

Our assurances to you

As far as possible, we will maintain the confidentiality of your concerns. However, in order to carry out a proper investigation, some information may need to be disclosed.

You may choose to raise your concern anonymously, provided that this is allowed by the laws of the country where you work.

We do not tolerate retaliation against an individual who discloses an actual or suspected breach of the code or helps with an investigation. However, a concern that is raised maliciously may lead to disciplinary action.