

# LEADERSHIP AND GOVERNANCE

## RESPONSIBLE WITH PRODUCTS

### Key Issues

Product Science   Illicit Trade   Adult Choice   Innovation and Portfolio   Product Quality

### PLC Executive Board Member Leadership

**Chief Executive**  
**Chief Development Officer**

### OPEX Leadership

Group Manufacturing, Supply and Research & Development Director  
CEO, Fontem Venutures  
Premium Cigar Director  
Division Director, Growth  
Division Director, Returns

### Management Structures

The Product Stewardship and Health Group (PSHG) consists of senior scientific, research and legal specialists who provide regular updates and advice to the Operating Executive and PLC Board on relevant science, research and development.

To ensure our products are sold responsibly market control activities are enabled worldwide through a network of specialists, including Corporate and Regulatory Affairs. New marketing developments and brand communications are led by central marketing and controlled by the Brand Regulatory Protection Team.

Anti-illicit trade activities are overseen by an Anti-Illicit Trade Steering Group and market activities controlled by Corporate and Regulatory Affairs including Group Security.

### Governance Framework

#### Policies and Standards

- Agency Policy Manual and Guidelines
- Business Partner Integrity Solution
- Code of Conduct
- Complaints Management Process Description
- EU Cooperation Agreement
- Global Digital Marketing Policy
- Imperial Tobacco International Marketing Standards
- Integrated ITG Leaf Processing manual for cigar manufacturing
- ITG Inspection and Weight control procedures of tobacco deliveries
- ITG Leaf Processing Manual for cigarette and OTP Manufacture
- Memoranda of Understanding
- Product and Materials Redistribution and Destruction Policy
- Product and Technical Development Policy
- Product Content Regulatory Compliance Policy
- Product Recall - Checklist
- Product Stewardship and Health Policy
- Product Supply Compliance Policy
- Sanctions Compliance Policy
- Secure Machinery Disposal
- Security Standards
- Shelf-Life
- Standards for Transport and Warehousing
- ISO 9001 Quality Management
- ISO17001 Laboratory Management

#### Regulatory Requirements

- Tobacco Control Legislation
- Product Legislation
- Consumer Protection Legislation
- Marketing Control Legislation
- Trading Standards
- Licensing for the Manufacture and Sale of Products

**REWARDING WORKPLACE**

**Key Issues** Health, Safety and Wellbeing Development and Reward Recruitment and retention Diversity Employee Voice

**PLC Executive Board Member Leadership**

**Chief Executive**

**OPEX Leadership**

Group HR & Transformation Director  
Group Manufacturing, Supply and Research & Development Director  
CEO, Fontem Venitures  
Premium Cigar Director  
Division Director, Growth  
Division Director, Returns

**Management Structures**

The Group OHSE team sets Group standards and provides specialist expertise for Health, Safety and Wellbeing. This is deployed through a network of OHSE specialists. Performance is regularly monitored, reviewed and reported to levels of operational management, OPEX and the PLC Board.

Employment practices are defined and set by the HR Centre of Expertise and shared enabled throughout the Group through a network of HR Business Partners.

Group requirements for employment practices are further enabled through the world-wide deployment of our Group HR System 'Workday' and our global service providers 'People Connect'.

**Governance Framework**

**Policies and Standards**

- Code of Conduct
- Community Contributions and Volunteering Policy
- Employee Data Handling Policy
- Employment Policy
- Fairness at Work
- Group Travel and Expenses
- Health Protection and Wellbeing
- Health and Safety Standards
- HR Global Policies
- Occupational Health and Safety Policy
- Speaking Up (Whistleblowing)

**Regulatory Requirements**

- Employment Legislation
- Health and Safety Legislation
- Data Protection

**RESPECTING NATURAL RESOURCES**

**Key Issues**

Forestry Water Climate and Energy Biodiversity Emissions and Waste

**PLC Executive Board Member Leadership**

**Chief Executive**

**OPEX Leadership**

Group HR & Transformation Director  
Group Manufacturing, Supply and Research & Development Director  
CEO, Fontem Venutres  
Premium Cigar Director

**Management Structures**

The Group OHSE & CR team sets Group standards and provides specialist expertise for environmental protection and management. This is deployed through a network of OHSE specialists.

Operational management particularly factory managers have localised responsibility for environmental management and performance.

The Leaf Sustainability team has specific managerial responsibilities for the promotion of good agricultural practices, environmental management and the progression of our wood sustainability programme, within our agricultural supply chain.

**Governance Framework**

**Policies and Standards**

- Code of Conduct
- Environmental Policy
- Environmental Standards
- ISO 14001 Environmental Management
- ISO 5001 Energy Efficiency
- CDP Participation

**Regulatory Requirements**

- Environmental Legislation
- Operational licensing
- Emissions Permits
- Environmental Reporting Legislation

## REINVESTING IN SOCIETY

### Key Issues

Shared Wealth Regulation Farmer Livelihoods Human Rights Business Conduct

### PLC Executive Board Member Leadership

**Chief Executive**  
**Chief Development Officer**  
**Chief Financial Officer**

### OPEX Leadership

Group Manufacturing, Supply and Research & Development Director  
Group HR & Transformation Director  
CEO, Fontem Venutures  
Premium Cigar Director  
Division Director, Growth  
Division Director, Returns

### Management Structures

The approach to shared wealth is predominately set and defined by Group Finance and the Group-wide financial controls. These include financial approvals, financial reporting and the Group Policy for managing Taxation. Group Procurement set the standards and requirements for supplier requisitions and payments.

The central CR Team set the group approach for community investment and involvement.

The Group approach to regulatory engagement and compliance is set by Corporate and Legal Affairs and enabled through a group-wide network of Corporate Affairs personnel.

The Governance Team work to define and deploy the Code of Conduct globally. This is to enable a unified standard for business conduct.

The central CR Team lead on the group understanding of Business and Human Rights and work with the most relevant functions and departments to ensure that requirements are met and improvements progressed. Specific responsibilities are also held for the address of Child Labour. Employment Practices and Supplier Standards are particularly relevant in the respect of Human Rights.

The Leaf Sustainability team has specific managerial responsibilities for the advancement of farmer livelihoods.

### Governance Framework

#### Policies and Standards

- Anti-Bribery and Corruption
- Code of Conduct
- Competition and Anti-Trust
- Community Contributions and Volunteering Policy
- Corporate Affairs Engagement Policy
- Corporate Development Policy
- Dividend Policy
- Finance Manual
- Fraud Risk and Management Policy
- Global Procurement
- Group Approval Matrix
- Guideline on Tax Stamps
- HR Global Policies
- Insurance
- Matters to be notified to Group Legal
- Policy on Auditor Independence
- Speaking Up (Whistleblowing)
- Supplier Payment Policy
- Supplier Security Compliance
- Sustainable Tobacco Production Programme
- Supplier Standards and Contracts
- Taxation Policy

#### Regulatory Requirements

- Tax legislation
- Financial Reporting Legislation
- Employment Legislation
- Tobacco Control Legislation
- Anti-Bribery and Corruption Legislation
- Anti-Trust and Competition Legislation
- Health and Safety Legislation
- Environmental Legislation
- Human Rights Conventions and Protocols
- Anti-Slavery & Human Trafficking Legislation