



E-Vapour Products Marketing Standard

Our E-Vapour Products Marketing Standard

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Fontem Ventures E-Vapour Products Marketing Standard

Fontem Ventures (**Fontem**) has a responsibility towards our Adult Consumers which is reflected in the quality and safety of our E-Vapour Products, and the way we communicate with Adults through our marketing efforts.

We believe that alternatives to Conventional Tobacco Products such as E-Vapour Products can make a significant contribution to tobacco harm reduction and we recognise that as such, they should only be marketed responsibly.

We are committed to the marketing, advertising and sale of our E-Vapour Products responsibly within the within the local laws, codes of practice and voluntary agreements which govern the advertising and promotion of E-Vapour Products (**Legal Requirements**). We have adopted a number of standards which govern our advertising, promotion and marketing activities, and corresponding sales of our E-Vapour Products.

These standards are set out in this E-Vapour Products Marketing Standard and applies to all our Adult Consumer marketing activities.

We fully support Youth access prevention and minimum age restrictions for the lawful sale and purchase of E-Vapour Products.

We believe that E-Vapour Products should only be sold to and used by Adult Consumers and we communicate in a responsible manner with Adults about our E-Vapour Products.

This E-Vapour Marketing Standard shall not apply to any E-Vapour Products that are licensed by any medicines authority nor any heated tobacco products (**HTPs**).

All Group Companies, employees and anyone working on our behalf (including all advertising, promotion, research agencies and any other organisations engaged in consumer marketing for our E-Vapour Products) shall adopt in good faith this E-Vapour Products Marketing Standard.

This E-Vapour Product Marketing Standard is approved and endorsed by FONTEM Business Leadership Team **18 July 2018**.

Our Commitment

Adults Only

We shall:

- only direct our E-Vapour Products advertising /promotional materials and activities at Adults.
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Responsibility & Respect

We will:

- target our marketing of our E-Vapour Products to Adult Consumers; and
 - respect the individual's choice.
-

Transparency

We will:

- provide clear and accurate information about our E-Vapour Products and their relative risks.

Definitions

Adult

A person aged 18 years or over, unless a higher minimum age for the lawful sale, purchase, possession or consumption of E-Vapour Products is specified by local law or voluntary agreement. If a higher minimum age is specified, the term "adult" means a person of at least that specified minimum age.

Adult Consumer

Adult Vaper or Adult Smoker.

Adult Smoker

An Adult smoker of Conventional Tobacco Products.

Adult Vaper

An Adult vaper who is a consumer of Conventional Tobacco Products and/or E-Vapour Products and/or nicotine containing products.

Advertising

Any Consumer advertising/promotional materials, activities and events relating to our E-Vapour Products.

Age Verification Mechanism

Any verification mechanism which confirms that a consumer is an Adult, and where such confirmation is not possible due to technological restrictions, the inclusion of an appropriate Adult age gating statement.

Adult Verification Process

Any verification process for online purchase of E-Vapour Products which confirms that the consumer is an Adult.

Demographic Information

Demographic information obtained by us or our agents from event owners/providers which shows at least (a) 75% of the intended audience of the event are Adults or, in the event such information is not available, (b) 75% of attendees at prior performance(s) of the event were Adults.

E-Vapour Product

- (a) A device such as an electronic cigarette (or e-cigarette) used for the inhalation of vapour;
- (b) A nicotine or non-nicotine containing liquid, which is intended to be vapourised by a product within part (a) of this definition (including any item containing such liquid).

No Conventional Tobacco Product or any product licensed by any medical authority shall be considered an E-Vapour Product for the purposes of the E-Vapour Product Marketing Standard.

Group Company/Companies

Companies in which Imperial Brands Plc has a controlling interest, for example, where Imperial Brands Plc has more than 50% of (a) the shares and/or (b) voting rights.

Legal Requirements

Local laws, local/national countries' codes of practice and/or voluntary agreements governing E-Vapour Products.

Promotional Events & Activities

Ranges of events and activities organized by or on behalf of a Group Company which are created specifically to raise awareness of a particular E-Vapour Product amongst Adults, and which would not take place without the support of Group Companies.

Sponsorship

An event, activity or team to whom Group Companies provide support in order to raise awareness of a particular E-Vapour Product brand or brands amongst Adults, but without which support the event, activity or team would still exist or take place.

Conventional Tobacco Products

Manufactured cigarettes, fine cut tobacco, cigars, cigarillos, pipe tobacco, pre-formed tobacco rolls, chewing tobacco, oral and nasal snuff as well as snus.

Youth

Anyone who is not an Adult.

Adults Only

We shall:

- only direct our E-Vapour Products advertising / promotional materials and activities at Adults.

We believe that E-Vapour Products advertising and promotional marketing activities should only be directed to Adults. We strongly support efforts to prevent both Youth access and initiation to E-Vapour Products.

We support effective legislation and regulation to prevent Youth purchase and use of E-Vapour Products.

Our E-Vapour Products Marketing Standard embraces marketing practices which reflects our clear focus on marketing to Adults, while also reducing Youth exposure to E-Vapour Products. In particular, we will ensure that:

- 1. We shall not market our E-Vapour Products to Youth;**
- 2. We will only direct our E-Vapour Products marketing activities towards Adults;**
- 3. We will not market or design e-liquids in flavours that appeal primarily to Youth (for example, featuring cartoon characters, baked goods, confectionary or candy-like naming/packaging).**

Advertisements

Our advertising, promotional and marketing activities will be directed towards viewers or participants who, to the best of our knowledge, are Adults. Such advertising, promotional and marketing activities will not use images, features or tropes that appeal primarily to Youth culture or reflect or be associated with Youth culture.

Any person using an E-Vapour Product or playing a significant role in our advertising must be and appear to be at least **twenty-five (25)** years old and shall not over-glamourize our E-Vapour Products.

Print Advertising

We will only place E-Vapour Products' brand advertising in printed media where we have satisfactory evidence (as established by objective, Demographic Information) that at least **75%** of the intended readers are Adults.

Outdoor Advertising

We will not place any E-Vapour Products' brand advertising on outdoor sign or billboards positioned closer than 100 meters to the perimeter of a school. This does not include outdoor signs at the point of sale or adult educational establishments.

Radio, Television and Cinema Advertising

Where advertising of E-Vapour Products is permitted:

- on radio and television, we will only place advertising of branded E-Vapour Products during those hours when the programming is directed at Adults (so as to minimize exposure to Youth); and
- in cinemas, we will only place advertising of branded E-Vapour Products where the advertisement is adjacent to films where the audience is likely to comprise a majority of Adults.

Video On Demand Advertising

We will not include E-Vapour Products brand advertising:

- on game consoles;
- in programmes commissioned for, principally directed at, or likely to appeal particularly to Youth.

Digital Advertising

Internet Sites (including internet sites managed by or on behalf of a Group Company)

We will only place E-Vapour Products' brand advertising on internet sites if access to the internet site and any downloadable content is restricted to Adults and pre-site access Adult Verification Mechanisms are in place.

Internet /digital advertisements

We will only place E-Vapour Products' brand advertising where we have satisfactory evidence (as established by objective, Demographic Information) that at least **75%** of the intended users are Adults.

Mobile Smartphone Applications (including internet sites managed by or on behalf of a Group Company)

We will ensure any technologies which allow users to access E-Vapour Products' brand advertising internet sites via 'shortcuts' using smartphones will only be accessible by users who are Adults and pre-site access Adult Verification Mechanism are in place.

Packaging Materials

All of our E-Vapour Products' packaging materials will:

- be designed in a manner so that the content clearly does not appeal to Youth; and
- include appropriate warning labels/language (including, as required by Legal Requirements).

Online Sales

We will restrict online sales of our E-Vapour Products to Adults who have completed the associated Adult Verification Process as required.

Retailer Merchandising Agreements

We will ensure that our merchandising agreements with retailers will contain provisions which require retailers to:

- maintain signage that restricts sales to Adults; and
- carry out an ID check for anyone who appears to not be an Adult and who attempts to purchase E-Vapour Products.

Promotional Gifts, Promotional Events and Activities

We will ensure that promotional gifts, and our promotional events and activities for branded E-Vapour Products will be designed to appeal to Adults. In addition, we will:

- restrict access to E-Vapour Products' brand Promotional Events and Activities only to Adults;
- only direct E-Vapour Products' brand promotional events and activities to age-verified Adults;
- only employ (whether directly or indirectly) personnel to participate in E-Vapour Products' brand promotional events and activities (including sampling where legally permitted) who are, and clearly appear to be aged **(twenty-one) 21 years** or over;
- only sell or give away E-Vapour Products' brand promotional items bearing E-Vapour Products' brand names or logos to Adults. E-Vapour Products' brand promotional clothing will only be made available in adult sizes;
- only direct E-Vapour Products' brand promotional offers to Adult Consumers. Where such an offer permits an Adult Consumer to be accompanied by other persons at an event or activity, those accompanying the Adult Consumer must themselves be Adults.

Endorsement and use of spokesperson

- We will only appoint Individuals to endorse our E-Vapour Products who are and clearly appear to be aged **(twenty-five) 25 years** or over.
- We will only appoint spokespersons where at least 75% of their following/intended audience are Adults (as established by objective, Demographic Information).

Sampling

Where legally permitted, we will only direct sampling of E-Vapour Products at Adult Consumers of Conventional Tobacco Products, E-Vapour Products or nicotine products who have given their express and informed consent to receive such samples.

Sponsorship

We will only conduct E-Vapour Products Sponsorship activities where we have satisfactory evidence that:

- all competitors, team members and active participants are Adults;
- such event or activity is directed to Adults where at least 75% of the intended audience are Adults (as established by objective, Demographic Information).

Responsibility & Respect

We will:

- target our marketing of our E-Vapour Products to Adult Consumers; and
- respect the individual's choice.

Responsibility

We believe and are committed to providing effective alternatives to Conventional Tobacco Products and that there is a potentially significant public health benefit if smokers switch to our E-Vapour products. In particular, we will:

- direct our marketing activities towards Adult Consumers; and
- only portray and promote images of usage of our E-Vapour Products in safe and appropriate environments.

Respect

We celebrate diversity in the world in which we live and work, and consequently in our marketing we will never discriminate, nor will we tolerate discrimination by our partners. In particular, we will:

- not portray or endorse associations with illegal, antisocial or violent behaviour;
- adhere to generally accepted contemporary standards of good taste and demonstrate sensitivity towards local cultures and attitudes; and
- never represent an individual's choice not to use our E-Vapour Products in a disparaging or denigrating manner, mock such a choice, or imply that such a choice is wrong or foolish.

Transparency

We will:

- provide clear and accurate information about our E-Vapour Products and their relative risks to enable E-Vapour Consumers to make informed choices.

We will only expressly or implicitly make statements about the quality, performance or functional attributes of our E-Vapour Products in our advertising, promotional and marketing activities when such statements can be supported by robust scientific evidence and technical or consumer research, as appropriate.

We do not base our statements on the comparative merits of our competitors.

We will ensure that all relevant packaging of our E-Vapour Products will carry clearly visible and appropriate health warnings as specified by Legal Requirements. For countries where no Legal Requirement for health warnings are specified, appropriate and commonly used health warnings shall be used.

All advertising of nicotine containing E-Vapour Products will make it clear that they contain nicotine.