

## OUR SUPPLIER CODE OF CONDUCT



STRONGER, BETTER, TOGETHER

**WITH OUR CUSTOMERS  
AND SUPPLIERS**

# OUR SUPPLIER CODE OF CONDUCT

AT IMPERIAL BRANDS WE KNOW THAT ACTING RESPONSIBLY IS KEY TO SUSTAINING OUR GLOBAL REPUTATION AS A TRUSTED PARTNER AND EMPLOYER. THIS MEANS THAT WE TAKE PRIDE IN WHAT WE DO AND HOW WE DO IT. ACTING RESPONSIBLY AND WITH INTEGRITY HAS HELPED US CREATE AND SUSTAIN A SUCCESSFUL BUSINESS.

## OUR VALUES



Our Code of Conduct is essential to our long-term sustainability and sets out the standards of responsible behaviours we should all follow in every part of Imperial Brands.

Our success depends on establishing open, honest and fair partnerships with trusted suppliers. We expect our suppliers to conduct their business in an ethical and responsible manner and comply with all applicable laws and

regulations. Our Supplier Code, based on our Code of Conduct, sets out the behaviours we expect our suppliers to demonstrate.

We select and do business with suppliers who can demonstrate that they operate in a manner consistent with our standards and Code of Conduct. We also expect our suppliers to ensure that their own business partners meet similar standards.



## **RESPECTING HUMAN RIGHTS**

**WE VALUE THE SAFETY, DIGNITY AND WELL-BEING OF OUR PEOPLE AND THOSE WHO SUPPORT OUR BUSINESS.**

- We are guided by the United Nations Guiding Principles on Business and Human Rights and support the International Labour Organisation's (ILO) core conventions
- We respect human rights throughout our operations including no child labour, no forced labour and the freedom of association and we expect our suppliers and business partners to do the same.

### **WE EXPECT OUR SUPPLIERS AND BUSINESS PARTNERS TO:**

- Ensure that people are employed fairly, safely and at least in compliance with international labour standards
- Respect the human rights of individuals across all of their operations
- Maintain a workplace that is fair, respectful and free from any form of harassment, discrimination or any other demeaning behaviour
- Ensure that employment is freely chosen and that there is no slavery, servitude or forced labour
- Not employ any person under 15 years old, or less than the local minimum employment age or mandatory school age, whichever is higher
- Not employ any person under the age of 18 years old to undertake tasks which are hazardous
- Respect the right of employees to join or form trade unions of their own choosing and bargain collectively
- Ensure that working hours and remuneration comply with national laws and benchmark industry standards, whichever offers greater protection.



## **PROMOTING A SAFE AND HEALTHY WORKPLACE**

**WE WANT A HEALTHY, SAFE AND PRODUCTIVE WORKING ENVIRONMENT FOR ALL OUR PEOPLE, BUSINESS ASSOCIATES, VISITORS AND NEARBY COMMUNITIES.**

- Suppliers should provide a workplace that promotes a positive health and safety culture and challenges unacceptable or potentially dangerous behaviour
- Suppliers should follow all country specific health and safety standards.





## KEEPING INFORMATION CONFIDENTIAL

WE ONLY SHARE CONFIDENTIAL INFORMATION WITH THOSE WHO NEED TO SEE IT, SAFEGUARDING PERSONAL INFORMATION AND IMPLEMENTING APPROPRIATE SECURITY TO PROTECT THE PRIVACY OF OUR EMPLOYEES, CONSUMERS, CUSTOMERS AND SUPPLIERS.

- Suppliers must safeguard Imperial Brands' confidential and personal information and meet the requirements of applicable data privacy laws and regulations
- Suppliers should inform us immediately of a suspected or actual data breach or if our information is released to any third party without authorisation
- Suppliers should have a non-disclosure or confidentiality agreement in place with us to protect confidential information
- Suppliers that process the personal information of our employees, consumers, customers or suppliers will be expected to enter into a data processing agreement with us.



## AVOIDING CONFLICTS OF INTEREST

WE ACT WITH INTEGRITY AND TRANSPARENCY, SHARING INFORMATION ABOUT RELATIONSHIPS, FINANCIAL INVESTMENTS, SECOND JOBS OR OTHER OPPORTUNITIES THAT MAY INFLUENCE OUR BUSINESS IN ANY WAY.

- Suppliers must make us aware of any actual or potential conflicts of interest as soon as they are known
- Suppliers must tell us if they are aware that any Imperial person has a conflict of interest in dealing with the supplier (for example if an Imperial person has a financial interest in the supplier or in business connections with the supplier).

## STRONGER, BETTER, TOGETHER WITH OUR CUSTOMERS AND SUPPLIERS



### COMPETING FAIRLY

WE ARE COMMITTED TO COMPETING FAIRLY AND HONESTLY AND ADHERING TO ALL ANTI-TRUST AND COMPETITION LAWS THAT APPLY TO OUR BUSINESS.

- Suppliers must understand the competition laws that apply to each market in which they operate and comply with them
- Suppliers must only work with our competitors where to do so would not create any conflict of interest and where appropriate steps are taken to protect Imperial Brands' confidential information
- Suppliers must not discuss any commercially sensitive topics, such as our input costs, our pricing, our terms of trade and our new product launches, with our competitors
- Suppliers must not act as an intermediary between us and our competitors, including not sharing with us our competitors' trade secrets or other confidential information.



### MARKETING RESPONSIBLY

OUR PRODUCTS ARE FOR ADULTS AND WE COMMUNICATE IN A RESPONSIBLE MANNER WITH ADULT CONSUMERS ABOUT OUR PRODUCTS.

- We are committed to marketing responsibly and we do not advertise or market our tobacco products to those under 18 or non-smokers
- Suppliers must apply our Marketing Standards to consumer advertising/promotional materials and activities they create for Imperial Brands products. In these situations, our Marketing Standards take precedence except where local law demands a higher standard.



### COMBATING ILLICIT TRADE

WE ARE OPPOSED TO ILLICIT TRADE IN ALL FORMS AND COOPERATE WITH AUTHORITIES GLOBALLY TO HELP PREVENT ILLEGAL PRODUCTS FROM FINDING THEIR WAY INTO THE LEGITIMATE MARKET.

- Suppliers must operate with honesty and integrity and commit to honouring our Product Supply Compliance Policy
- Suppliers must report any suspicions related to the illicit trade of our products to us, including the use of our branded material.



## **FIGHTING BRIBERY & CORRUPTION**

WE DO NOT TOLERATE BRIBERY OR CORRUPTION.

- Compliance with anti-bribery and corruption laws is compulsory
- We only work with suppliers who comply with all local laws and do not tolerate, permit or engage in bribery, corruption or unethical practices
- Suppliers must not make a corrupt payment on their own or Imperial's behalf
- Suppliers must not offer or give anything of value to anyone for the purpose of securing, retaining or facilitating business (such as payment to reduce taxes or customs duties)
- Suppliers must immediately report any concerns in respect of bribery or corruption to Imperial Brands or confidentially by using the speaking up service.



## **GIVING AND RECEIVING GIFTS & ENTERTAINMENT**

WE EXCHANGE GIFTS AND ENTERTAINMENT TO BUILD GOODWILL IN OUR BUSINESS RELATIONSHIPS AND NOT FOR ANY IMPROPER PURPOSE.

- Suppliers are expected to respect Imperial's policy on gifts and entertainment when doing business with Imperial
- Suppliers must not offer or give gifts or entertainment to any Imperial employee that is intended as, or may be viewed as, an attempt to improperly influence business decisions
- Suppliers must not provide gifts or entertainment to public or government officials on behalf of Imperial except when to do so is lawful and has been expressly authorised by Imperial Brands.



## **COMPLYING WITH INTERNATIONAL SANCTIONS AND TRADE RESTRICTIONS**

WE COMPLY WITH INTERNATIONAL SANCTIONS AND TRADE RESTRICTIONS.

- Suppliers must comply with sanctions and trade restrictions that are relevant to their business.





## RESPECTING THE ENVIRONMENT

WE ARE COMMITTED TO INTRODUCING MORE ENVIRONMENTALLY SUSTAINABLE WAYS OF WORKING.

- Suppliers should manage their environmental impact responsibly, comply with environmental laws, and demonstrate a commitment to conserving resources by reducing day-to-day impacts on the environment
- We encourage our suppliers to participate in annual submissions to the Carbon Disclosure Project.

## REPORTING CONCERNS

If you, as a supplier to Imperial Brands, have a serious and genuine concern please contact us at:

**Imperial Brands Plc**  
**121 Winterstoke Road**  
**Bristol BS3 2LL, United Kingdom**  
**Tel:** +44 (0) 117 963 6636  
**Email:** Governance.Team@impbrands.com

If you do not feel comfortable speaking up to somebody inside the company you can raise your concerns independently using our [Speaking Up](#) Service.

### Monitoring Compliance

We do not accept or ignore supplier activities which we suspect may breach our Supplier Code or our Code of Conduct. Suppliers that do not meet our standards and cannot provide an action-plan to quickly rectify their deficiencies will not be considered for future contracts.



SPEAKING  
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