





REPORTING CRITERIA DOCUMENT 2023: Principles, Criteria and Methodologies



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Principles, Criteria and Methodologies

This document sets out Imperial Brands' reporting approach, scope, and criteria which underpins the PLC Board's commitment to disclose our responsible performance, in the Environmental, Social, and Governance (ESG) section of the Annual Report and Accounts (AR&A) and on the corporate website.

WE AIM TO:

- Report our activities honestly and give a fair impression of business conduct.
- Provide key stakeholders with appropriate information, as guided by leading frameworks and standards such as the Global Reporting Initiative (GRI); and
- Inform relevant investor evaluations and indices.

COMMITMENT TO REPORTING

As a UK public company, we are required to disclose specific information in the AR&A, under the UK Companies Act. In addition, we provide information on how we manage our business responsibly, with key performance measures to demonstrate our progress. This helps to demonstrate that our Board of Directors is addressing their environmental, social and governance (ESG) responsibilities towards key stakeholders, including employees, investors, suppliers, customers, consumers, communities, government, and society.

We have a formal approach to ESG reporting which identifies important issues and performance indicators. Resulting information is used by Executive Management to set improvement objectives and targets, which are also endorsed by the PLC Board. Performance management is then driven and enabled at functional, market and site level.

We periodically undertake an ESG materiality assessment, to review, identify and prioritise the most important sustainability issues for our business and external stakeholders. We conducted our latest materiality assessment in March 2023 listening to the views of consumers, customers, employees, regulators, investors, and shareholders. Our 2021 assessment identified eight focus areas, which we have grouped into three broad categories: Healthier Futures, Positive Contribution to Society and Safe and Inclusive Workplace, which our latest assessment re-confirmed. These ESG focus areas are critical to achieving our vision and longer-term purpose, as we build a strong challenger business, powered by responsibility, focus and choice. We make our own internal assessments by considering global sustainability issues and relevant social and environmental risks. We reference leading guidelines and indices, which include the Global Reporting Initiative (GRI) Standards and CDP.

GENERAL REPORTING PRINCIPLES

In developing our reporting, we have been guided by good practice principles. We therefore seek to report information which is:

- Inclusive; relevant to our key stakeholders.
- Material; mutually important to us and our stakeholders.
- Responsive; action based on informed decisions.
- Impactful; effective action addressing mutually important issues; and
- Robust; timely, accurate and, where appropriate, subject to verification and assurance.

Where possible we provide yearon-year comparable data with explanations on our performance.

REPORTING BOUNDARIES AND SCOPE OF REPORTING

Our business is managed and reported on a functional basis.

We manage, gather and report data either as a whole or by function for activities over which we have operational control. We do not report on a legal entity basis. Our reporting includes all activities at manufacturing sites, main offices, Madagascar Farms* and from sales operations associated with the production and sale of products. Operations not included, as deemed de minimis or being outside of our current reporting scope, relate to the small sales offices and warehouses, which collectively contribute no more than two per cent of each reported indicator.

*The only tobacco farms within our operational control are located in Madagascar. They collect their data and report together.

OUR PEOPLE AND PLANET AGENDA

An important element of the foundation-building phase of our business strategy has been a refresh of our approach to environmental, social and governance (ESG) responsibilities. Imperial has a long tradition of responsible business with a strong track record of preventing underage¹ access, combating illicit trade and continually reducing its carbon footprint.

Our recent ESG review has focused on prioritising our activities to ensure they fully align with our new strategy, purpose and vision and meet the evolving expectation of stakeholders.

Our ESG strategy represents an exciting opportunity to make a positive difference, as well as be

a platform to demonstrate our strategic risk management of ESG issues.

A full materiality study, which combined both quantitative data-led analysis and qualitative stakeholder interviews, highlighted eight key areas of focus.

We have grouped these into three broad categories:



CONSUMER HEALTH

We are committed to strengthening our next generation products (NGP) and making a more meaningful contribution to harm reduction by offering adult smokers a range of potentially less harmful products.

HEALTHIER FUTURES



We are committed to reducing our impact on the climate throughout our value chain. Focusing on both mitigation and adaptation.



We are committed to minimising waste associated with our products, packaging and production processes.

POSITIVE CONTRIBUTION TO SOCIETY



FARMER LIVELIHOODS & WELFARE

We are committed to engaging with our suppliers to support and develop farming communities and promote sustainable agriculture.



We are committed to sourcing products and services in a compliant, sustainable and socially conscious manner. We will work with our suppliers to ensure continuous improvements. Our ESG strategy remains aligned with the United Nations Sustainable Development Goals (SDGs).



HUMAN RIGHTS

We are committed to raising awareness and improving processes in our operations and supply chains recognising the importance, influence and role we have in promoting and protecting human rights.

SAFE & INCLUSIVE WORKPLACE



We are committed to achieving world-class occupational health, safety and wellbeing for all our employees.



We are committed to creating a truly diverse and inclusive organisation renowned for celebrating difference, enabling our people to feel that they belong and be their authentic selves.

We will respect, recognise and value the diversity of our consumers and reflect the communities in which we operate.

1. Underage is defined as consumers under the age of 18 or a higher legal age for purchase.

REPORTING ENTITIES*



*Correct as of 30 September 2023. Entities may have been double counted if site is both a manufacturing site and a Sales and Marketing entity. Not all entities are required to complete all environmental and OHS campaigns, see individual indicator for scope details.

Where appropriate, we differentiate manufacturing operations as these locations make a greater contribution to the data values for the majority of indicators. Unless stated otherwise, all manufacturing sites under our operational control are in scope. Not all entities detailed above will report both occupational health and safety and environmental data, full scope inclusions are detailed under 'scope' for each indicator.

The logistics part of our Group business operates under the legal entity of Logista. Due to commercial sensitivities this entity is managed remotely, and it is responsible for its own data. Logista does not report into Group non-financial data and this is specified in the scope of individual indicators. We report independently verified information provided by Logista in our Annual Report and Accounts. Logista has provided verified data since financial year (FY) 2014 for absolute Scope 1, 2 and 3 emissions. Further information on Logista can be found at https://www. logista.com/en/home.html.

Our relative indicators are expressed against tobacco and NGP net revenue, which comprises of tobacco and NGP revenue less duty and similar items, excluding peripheral products. Units for absolute and relative measures can be found in the 'unit' section for each individual indicator.

INTRODUCING NEW SITES AND SITE CLOSURES

Based on business transformation, we introduce and remove entities to our reporting scope. Any changes in scope are clearly reported within this document and in particular the 'scope' section of each reported indicator. Our relative reported performance against tobacco and NGP net revenue helps to normalise any such changes in scope.

Occupational health safety and environment data for new sites is included into the Group reporting scope once the data collection from sites has been validated in the Non-Financial Reporting (NFR) System. Where possible, historic data may be used to ensure we have a full reporting year worth of data before reporting, where this is not possible an estimate may be used. Where we have sites that are closing, data will be included in our Group reporting until such time as is impractical to do so. For Occupational Health and Safety (OHS) data this will include data up until the last day of operational control.

For environmental data this will include data up until the last day of production and/or decommissioning if undertaken by Imperial.

RESTATING THE GROUP BASELINE

Restating the Group baseline for environmental data may be required if a material or significant change occurs. If material data errors are detected during the independent assurance process, we make all necessary steps to restate data, including the baseline if required.

Our baseline year is 2017 for all environmental indicators. This has been determined based on the work done to set science-based carbon reduction targets which were approved by the Science Based Targets Initiative. In FY23 we recalculated our scope 3 in line with the latest guidance from the greenhouse gas protocol and CDP and have restated our baseline.

IMPERIAL BRANDS NFR SYSTEM

The NFR system is the main reporting system for collecting OHS and environment data. The system is subject to administrative support provided by a third-party, SustainIt.

Raw data, in line with NFR data definitions, is entered into the system at site level by contributors, who are often topic specialists in their area. Data is then validated on the system, by a senior manager, taking full accountability for timeliness and accuracy of the data.

The system calculates performance indicators from the data entered and can generate reports at any level of the organisation including at local, regional, functional, and Group level to inform performance management processes.

Data collection campaigns are launched through the NFR System, on a monthly, quarterly, or annual basis; further information on campaign frequency can be found in the 'Method' section of each individual indicator. Users are required to submit data against strict deadlines to meet internal and external reporting requirements. Once deadlines have passed, campaigns are closed. Following monthly investigation, data checks and clarifications, the data is reported internally. At the end of our reporting year the data is frozen to allow for assurance, and any further changes required are logged in a change log and can only be implemented once the change threshold for the indicator has been met (2%). The data checking process provides a series of data quality checks assessing trends and anomalies on a monthly basis.

Amendments may be made as part of the validation and correction process or following the end-of-year independent assurance process. In the unlikely event amendments are significant (>2%), the figures will be restated in the subsequent annual reporting with a footnote in the public disclosures explaining the restatement.

Our environmental reporting year, 1 July – 30 June, covers a 12-month period which consists of 3 months from the previous financial year and 9 months of the current financial year, allowing us enough time for internal consolidation, checking and external data verification. Normalised net revenue indicators relate to the full financial year.

ASSURANCE

We engage an independent third party to provide limited assurance of selected publicly reported information. This is in line with good practice and to help build trust with our stakeholders.

The assurance exercise is scoped to test select quantitative indicators and whether reporting is accurate and reliable. We focus on performance indicators that are most material to both our organisation and stakeholders. This approach enables the third party to provide a limited assurance opinion on the completeness and accuracy of the reported information in all material respects.

The assurance and verification process includes data assessment and testing, sample site visits and a number of interviews with management and subject matter experts. Details of assurance activities including the assurance statement can be accessed on our website.

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POSITIVE CONTRIBUTION TO SOCIETY

FARMER LIVELIHOODS & WELFARE (CTD)	
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Suppliers have corrective action plans for 100% of non- conformances (where required)	21
Suppliers have preventative action plans for 100% of non-conformances (where required)	
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HEALTHIER FUTURES

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CONSUMER HEALTH

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INDICATORS FOR NON-FINANCIAL REPORTING – REPORTING SPECIFICS AND METHODOLOGY

This section details the methodology for all indicators we publicly disclose in the 2023 Annual Report and Accounts and the ESG section of the corporate website: Healthier Futures. Not all indictors have been subject to third party data verification. This is clearly stated within the criteria for each indicator.



Compliance with Health and Safety Framework

Definition	Our framework follows a Plan-Do-Check-Act approach, and it is measured through 17 key leading indicators. These include policy review and communication, establishing a strategy and defining roles and responsibilities, having access to competent advice, identifying legal requirements, and proving compliance, provision of work equipment, resources, and training, regular review of objectives and targets, completion of audits and risk assessments, and incident management.
Scope	Data for this indicator is currently collected for all sales and marketing entities and all manufacturing sites.
Reporting Period	1 October 2022 – 30 September 2023
Unit	Percentage
Method	Compliance with the Framework Leading Indicators is recorded quarterly. For sales and marketing entities, the data is collated by the central NFR team with help from the cluster contributors. The percentage score for sales and marketing sites is submitted at cluster level. For manufacturing sites this data is reported in the NFR system by individual sites and collated at Group level for reporting.
Third party data verification FY23	No

Operations with ISO 45001 at the time of reporting	
Definition	We approach the improvement of OHS performance through risk management, employee training, performance reporting, audits, and improvement planning. This is structured by the application of a local formal OHS management system, which is subject to an annual independent audit by external certification companies to help drive continuous improvement. We have selected the international standard ISO 45001 as the most appropriate standard for guiding the development of our local OHS systems.
Scope	The scope covers all manufacturing sites including cigarette, other tobacco products (OTP), cigar, tobacco leaf processing, paper, and tube operations. It excludes laboratories, main offices, Sales and Marketing entities, distribution centres, leaf warehouses, farms, and joint ventures.
Reporting Period	As of end of financial year 30 September 2023
Unit	Percentage
Method	Through the NFR system, information on the occurrence of ISO 45001 certifications is collated centrally on an annual basis. The central team calculates the percentage by dividing the number of certifications by the number of operating sites within the scope. NFR users at the sites are required to upload the current certificate.
Third party data verification FY23	No



Accidents & lost time accidents

Definition	Work-related incidents including physical assaults to employees. 'Work-related' means that the incident occurred in relation to the employees' activities executed on behalf of the company. Travelling to and from work accidents are excluded. "Lost Time Accidents" are work-related accidents resulting in absence from one or more scheduled workdays or shifts beyond the day or shift the accident occurred. A workday or shift is the specified hours that the employee is required to do on behalf of the company within any 24-hour period. "Accidents" are work-related accidents resulting in no lost time i.e., the employee can immediately return to work, or the employee is unable to work for a period on the day of the accident but is able to return to work at the next available workday or shift.
Scope	Data for this indicator is collected for all sales and marketing entities, all manufacturing sites, warehouses, offices, and fully contracted workers at Madagascar Farms. Employees include those employed directly by the company whether they are full-time, part-time or on a specific length contract including agency workers under the control of Imperial Brands.
Reporting Period	1 October 2022 – 30 September 2023
Unit	Number
Method	'Lost Time Accident' and 'Accident' data is entered into the NFR system monthly, by local personnel. The system then consolidates the data for the central Group ESG team to review.
Third party data verification FY23	No

Lost time accident frequency rat	te
Definition	Lost time accidents are work-related incidents resulting in absence from one or more scheduled workdays or shifts, beyond the day or shift the accident occurred. A workday or shift is the specified hours that the employee is required to do activity on behalf of the company within any 24-hour period. 'Work- related' means that the incident occurred in relation to the employees' activities executed on behalf of the company. This excludes situations such as travelling to and from work.
Scope	Data for this indicator is collected for all sales and marketing entities, all manufacturing sites, warehouses, offices, and fully contracted workers at Madagascar Farms. Lost time accident frequency rate relates to employees who are employed directly by the company whether they are full-time, part-time or on a specific length contract. It does not apply to contractors who are employed by a third party but does include agency workers working under the control of Imperial Brands.
Reporting Period	1 October 2022 - 30 September 2023
Unit	Number of lost time accidents per 200,000 hours
Method	Lost time accident, and hours worked data is entered into the NFR system monthly by local personnel. The system then consolidates the data for the central Group ESG team to review. Hours worked is the average number of hours worked multiplied by the average number of employees during the period. Where actual data is available this is used (e.g., clock in/out systems).
	The lost time accident frequency rate is calculated as follows: (Total number of lost time accidents except while travelling to and from work/number of hours worked) x 200,000 hours.
Third party data verification FY23	Yes



Accident frequency rate

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Definition	Accidents are work-related incidents resulting in no lost time i.e., the employee can immediately return to work, or the employee is unable to work for a period on the day of the incident but is able to return to work at the next available workday or shift. 'Work-related' means that the incident occurred in relation to the employees' activities executed on behalf of the company. This excludes situations such as travelling to and from work.
Scope	Data for this indicator is collected for all sales and marketing entities, all manufacturing sites, warehouses, offices and fully contracted workers at Madagascar Farms. Accident frequency rate relates to employees who are employed directly by the company whether they are full-time, part-time or on a specific length contract. It does not apply to contractors who are employed by a third party but does include agency workers working under the control of Imperial Brands.
Reporting Period	1 October 2022 – 30 September 2023
Unit	Number of accidents per 200,000 hours
Method	Accident and hours worked data is entered into the NFR system monthly by local personnel. The system then consolidates the data for the central Group ESG team to review. The accident frequency rate is calculated as follows: The accident frequency rate is calculated as follows: (Total number of accidents except while travelling to and from work/number of hours worked) x 200,000 hours.
Third party data verification FY23	No
Fleet Collision Rate	
Definition	Work related vehicle collisions involving the Imperial Brands fleet of vehicles including motorbikes, 3 wheeled vehicles such as "Tuk Tuks", cars, and goods vehicles. 'Work-related' means that the collision occurred in relation to the employees' activities executed on behalf of the company. Travelling to and from place of work collisions are excluded apart from collisions involving Sales Representatives travelling between home and customer premises, which are included. A workday or shift is the specified hours that the employee is required to do activity on behalf of the company within any 24-hour period. All vehicle accidents are included that result in injury, death, or material damage, however there are several types of accidents that are excluded: acts of God/nature, collisions with animals, hit while parked, fire, theft, vandalism, collisions with debris, glass/windscreen only damage, or vehicle failure. Internal transport collisions such as forklift trucks are excluded.
Scope	Data for this indicator is collected only for sales and marketing entities. Employees include those employed directly by the company whether they are full-time, part-time or on a specific length contract including agency workers under the control of Imperial Brands.
Reporting Period	1 October 2022 – 30 September 2023
Unit	Collisions per million kilometres
Method	Data is entered into the NFR system monthly by local personnel. The system then consolidates the data for the Group ESG team to review. Accident frequency rate is calculated by: (number of collisions x 1,000,000)/ kilometres driven.

Third party data verification FY23 Yes



EMPLOYEE HEALTH, SAFETY & WELLBEING

Fatalities	
Definition	Work related incidents including physical assaults resulting in the death of employees, third party contractors or members of the public. 'Work-related' means that the incident occurred in relation to the employees' or contractors' activities executed on behalf of the company, or a member of the public was killed because of an employee or contractor work activity. Travelling to and from work accidents are excluded as well as other non-work-related death-in-service such as employee death from natural causes or other non-work-related cause.
Scope	Data for this indicator is collected for all sales and marketing entities, all manufacturing sites, warehouses, offices, and fully contracted workers at Madagascar Farms. Fatalities to employees include those employed directly by the company whether they are full-time, part-time or on a specific length contract including agency workers under the control of Imperial Brands. Contractors relates to third parties working at Imperial Brands premises conducting work commissioned by Imperial Brands. Visitors to an Imperial Brands location involved in fatal accidents will be recorded as "members of the public".
Reporting Period	1 October 2022 – 30 September 2023
Unit	Number
Method	There is an internal Standard outlining the immediate escalation process. Data is entered into the NFR system monthly by local personnel.
Third party data verification FY23	No

Fleet vehicles fitted with an In Vehicle Monitoring System (IVMS) Definition A range of IVMS solutions are available including basic 'App' type monitoring, through to hardware installed in vehicles linked to data gathering and reporting software. Markets should choose the system most suited to their needs. As a minimum, it must record against a driver identifier such as employee or driving license number, the speed, harsh acceleration or deceleration, kilometres or miles driven, driven hours. Data for this indicator is collected for all Sales entities. Scope **Reporting Period** 1 October 2022 - 30 September 2023 Unit Percentage Method Data is entered into the NFR system on a quarterly basis by local personnel. The system then consolidates the data for the central Group ESG team to review. Third party data verification FY23 No



Female Representation in the workforce

Definition	The proportion of employees recorded as female across Imperial Brands Group excluding Logista.
Scope	The scope covers full-time and part-time employees at Imperial Brands companies.
Reporting Period	As of end of financial year 30 September 2023
Unit	Percentage
Method	Number of female employees divided by number of all employees. Where employee gender is listed as 'blank' or 'not declared', these are included in the calculation as non-female.
Third party data verification FY23	Yes

Female employee representation in senior management	
Definition	The proportion of senior management employees (Global Grade 3, 4 and 5) recorded as female across Imperial Brands Group.
Scope	The scope covers full-time and part-time employees at senior management level: Global Grade 3, 4 and 5.
Reporting Period	As of end of financial year 30 September 2023
Unit	Percentage
Method	Number of female employees (Global Grade 3, 4 and 5) divided by number of all Global Grade 3, 4 and 5 employees. Where employee gender is listed as 'blank' or 'not declared', these are included in the calculation as non-female.
Third party data verification FY23	Yes

Female employee direct r	reports to the Executive Leadership Team (ELT)
Definition	The proportion of direct reports to the ELT recorded as female across Imperial Brands Group.
Scope	The scope covers all direct reports to the ELT across Imperial Brands, excluding administrative or support staff.
Reporting Period	As of end of financial year 30 September 2023
Unit	Percentage
Method	Number of female employees reporting to the ELT divided by number of all employees reporting to the ELT – excluding administrative or support staff.

Yes

Third party data verification FY23



Female Executive Leadership Team (ELT) Members

Definition	The Executive Leadership Team (ELT) comprises the Executive Directors and key members of our senior management team. The ELT is responsible for supporting the Chief Executive with implementation of Group strategy, monitoring the detailed operational performance of all aspects of the business and ensuring the Group achieves its financial and non-financial targets.
Scope	The scope covers all ELT members.
Reporting Period	As of end of financial year 30 September 2023
Unit	Percentage
Method	Number of female ELT members divided by the total number of ELT members, excluding the Company Secretary. ELT member adjustments are announced by the Company Secretariat.
Third party data verification FY23	Yes

Female PLC Board Members	
Definition	The Imperial Brands Board manages overall control of Group affairs, including responsibility for: commercial strategy, approval of financial statements, major acquisitions and disposals, authority levels for expenditure, treasury and risk management policies and succession plans for senior executives.
Scope	The scope covers all PLC Board members. The Company Secretary is excluded.
Reporting Period	As of end of financial year 30 September 2023
Unit	Percentage
Method	Number of female Board members divided by number of total PLC Board members. Board member adjustments are announced to the Group by Corporate Communications and Company Secretariat.
Third party data verification FY23	Yes

Ethnic Background PLC Board	
Definition	The Imperial Brands Board manages overall control of Group affairs, including responsibility for: commercial strategy; approval of financial statements; major acquisitions and disposals; authority levels for expenditure; treasury and risk management policies; and succession plans for senior executives.
Scope	The scope covers all PLC Board members. The Company Secretary is excluded.
Reporting Period	As of end of financial year 30 September 2023
Unit	Percentage
Method	Number of Board members who self-identify as being from a non-white background divided by number of total PLC Board members. Board member adjustments are announced to the Group by Corporate Communications and Company Secretariat.
Third party data verification FY23	Yes



FTSE Women Leaders Review Combined Executive Leadership Team (ELT) & Direct Reports

Definition	Imperial Brands participates in the FTSE Women Leaders review, an independent, business-led framework supported by Government which sets recommendations to improve the representation of women on the Boards and Leadership teams of the FTSE 350 and 50 of the UK's largest private companies.
Scope	The scope covers all ELT Members and direct reports to the ELT across Imperial Brands, excluding administrative or support staff.
Reporting Period	As of 31 October 2023
Unit	Percentage
Method	Number of female employees and contractors in or reporting to the ELT divided by number of all employees and contractors in or reporting to the ELT – excluding administrative or support staff.
Third party data verification FY23	Yes

Employee Turnover Rate	
Definition	The percentage of employees who have left the business over the financial year either voluntarily or involuntarily.
Scope	The scope includes all employees in our Workday system. This reflects all employees excluding those employed by ITG Brands and Logista, which represents approximately 65% of our employee population.
Reporting Period	As of end of financial year 30 September 2023
Unit	Percentage: Leavers as a percentage of the average population
Method	The total number of employees who left the company over the reporting period divided by the average of the Employee population at the start and end of the reporting period.
Third party data verification FY23	No

New Employee Hires	
Definition	The number of employees who were hired into the company over the reporting period.
Scope	The scope includes all employees in our Workday system. This reflects all employees excluding those employed by ITG Brands and Logista, which represents approximately 65% of our employee population.
Reporting Period	As of end of financial year 30 September 2023
Unit	Percentage. Split by Gender and Split by Age Group
Method	The number of employees hired for each demographic group divided by the total number of employees hired over the reporting period.
Third party data verification FY23	No

FARMER LIVELIHOODS & WELFARE

Percentage of leaf suppliers committed to support their farmers access a decent standard of living

Definition	The Living Income Community of Practice defines a living income as the net annual income for a household in a place to afford a decent standard of living for all members of that household. A decent standard of living will vary between countries and within countries (e.g., depending on rural and urban conditions). There are, however, some core elements that are included in a defined decent standard of living, which include costs of food, water, housing, education, healthcare, transport, clothing, and other essential needs such as provisions or savings for unexpected events. The outcome of calculating the cost of a decent standard of living in a particular place is a living income benchmark. Living income benchmarks may be used to assess for living income gaps, or the negative difference between a living income benchmark and a farmers' actual income. According to this concept, a farmer's actual net income goes beyond primary or secondary crops to look at farmer incomes holistically including other net revenue streams farmers have available to achieve a decent standard of living.
Scope	All leaf suppliers, from whom Imperial sourced tobacco during the period under review.
Reporting Period	2023, based on crop years that ended during the 2023 calendar year
Unit	Tobacco leaf suppliers
Method	The methodology uses supplier self-assessment data from the Sustainable Tobacco Program (STP) ¹ . The total number of leaf suppliers who answer "yes" to the STP self-assessment question "Is your company committed to addressing farmer livelihoods" (question ID: 70345) is calculated as a percentage of the total number of leaf suppliers. As a further data integrity measure, the STP Secretariat then substantiate the answers to this question by comparing for consistency against the question that requests suppliers to upload a policy or commitment confirming their commitment to addressing farmer livelihoods (question ID: 70346). Without a policy or commitment uploaded, the supplier is required to answer "no" to the commitment question above, used for this KPI. ¹ The Sustainable Tobacco Programme (STP) is an industry initiative which aims to help enhance agricultural supply chain due diligence and accelerate positive impacts on social and environmental footprints. Annual self-assessments are completed by suppliers online. This supplier data is substantiated by a third party, the STP Secretariat, which aims at improving data integrity and reflecting its intended purpose.
Third party data verification FY23	No – Substantiation ready (if required)

Percentage of sustainable wood use

Fuels for curing are categorised into biogenic and fossil fuels, as well as other fuels. Biogenic fuels include wood (from sustainable and un-sustainable sources), machine-made bagasse, rice husk, corn cobs, grass, shrubs, tree branches or straw, and handmade bagasse or palm oil kernel shells (POKS). Fossil fuels include coal, LPG, and natural gas. Other fuels may for example include electricity.Sustainable wood fuel is defined as wood produced through sustainable management practices. Sustainable management practices ensure that the regrowth or regeneration (of forests/wooded land) is equal to, or greater than, the level of extraction/depletion. Sources of sustainable wood may include, but is not limited to, legal plantations (including on-farm planting, that are sustainably managed), secondary or degraded forests that are sustainably managed, identified-, invasive-, or exotic species that are not planted on purpose and approved for removal and certified material under recognized schemes, like FSC or PEFC.Sources of usual forests, as well as primary forests and forests of high conversion of natural forests, as well as primary forests and forests of high conversion of natural forests, as well as primary forests and forests of high conversion of natural forests, as well as primary forest and forests of high conversion of natural forests, as well as primary forest and forests of high conversion of natural forests, as well as primary forest and forests of high conversion of natural forests, as well as primary forest and forests of high conversion of natural forests, as well as primary forest and forests of high conversion of natural forests, as well as primary forest and forests of high conversion of natural forests, as well as primary forest and forests of high conversion of natural forests, as well as primary forest and forest of high conversion of natural forests, a	Definition	There are various tobacco leaf curing methods, including air-curing, sun-curing, and flue-curing. The type of curing method is dependent on the tobacco variety. Fuel-cured tobacco requires fuels for curing, since the tobacco leaf is dried, in curing barns, by means of heated air.
management practices. Sustainable management practices ensure that the regrowth or regeneration (of forests/wooded land) is equal to, or greater than, the level of extraction/depletion.Sources of sustainable wood may include, but is not limited to, legal plantations (including on-farm planting, that are sustainably managed), secondary or degraded forests that are sustainably managed, lentified, invasive-, or exotic species that are not planted on purpose and approved for removal and certified material under recognized schemes, like FSC or PEFC.Sources of un-sustainable wood may include, but is not limited to, natural forests that are un-sustainably managed, plantations that are a result of the conversion of natural forests, as well as primary forests and forests of high conservation value.As such, to be wood sustainable, the wood used for curing should not contribute 		Fuels for curing are categorised into biogenic and fossil fuels, as well as other fuels. Biogenic fuels include wood (from sustainable and un-sustainable sources), machine-made bagasse, rice husk, corn cobs, grass, shrubs, tree branches or straw, and handmade bagasse or palm oil kernel shells (POKS). Fossil fuels include coal, LPG, and natural gas. Other fuels may for example
(including on-farm planting, that are sustainably managed), secondary or degraded forests that are sustainably managed, identified-, invasive-, or exotic species that are not planted on purpose and approved for removal and certified material under recognized schemes, like FSC or PEFC. Sources of un-sustainable wood may include, but is not limited to, natural forests that are un-sustainably managed, plantations that are a result of the conversion of natural forests, as well as primary forests and forests of high conservation value.ScopeSuppliers', from whom Imperial sourced tobacco during the period under review, contracted farmers growing tobacco types that require fuel for curing (i.e., Dark Fire Cured and Flue Cured Virginia tobacco).Reporting Period2023, based on crop years that ended during the 2023 calendar yearUnitSustainable wood use (%)MethodThe methodology uses supplier self-assessment data from the Sustainable robacco Program (STP) ² . The total volume of sustainable wood used from the answers to the STP self- assessment question ID 69979 and 69946) is calculated as a percentage of the total 		management practices. Sustainable management practices ensure that the regrowth or regeneration (of forests/wooded land) is equal to, or greater than, the
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Tobacco Program (STP) ² . The total volume of sustainable wood used from the answers to the STP self- assessment question "Amount of wood from sustainable sources used as curing fuel" (question ID 69979 and 69946) is calculated as a percentage of the total volume of wood required to cure the tobacco. ² The Sustainable Tobacco Programme (STP) is an industry initiative which aims to help enhance agricultural supply chain due diligence and accelerate positive impacts on social and environmental footprints. Annual self-assessments are completed by suppliers online. This supplier data is substantiated by a third party, the STP Secretariat, which aims at improving data integrity and reflecting its intended purpose.	Unit	Sustainable wood use (%)
to help enhance agricultural supply chain due diligence and accelerate positive impacts on social and environmental footprints. Annual self-assessments are completed by suppliers online. This supplier data is substantiated by a third party, the STP Secretariat, which aims at improving data integrity and reflecting its intended purpose.	Method	Tobacco Program (STP) ² . The total volume of sustainable wood used from the answers to the STP self- assessment question "Amount of wood from sustainable sources used as curing fuel" (question ID 69979 and 69946) is calculated as a percentage of the total
Third party data verification FY23 Yes		² The Sustainable Tobacco Programme (STP) is an industry initiative which aims to help enhance agricultural supply chain due diligence and accelerate positive impacts on social and environmental footprints. Annual self-assessments are completed by suppliers online. This supplier data is substantiated by a third party, the STP Secretariat, which aims at improving data integrity and reflecting
	Third party data verification FY23	Yes

FARMER LIVELIHOODS & WELFARE

Number of farmers and families with improved access to childcare and education

Definition	Farmers and their families in tobacco growing communities have improved access to childcare and education facilities and other projects to address root causes of child labour, for example, supporting the ability to get to schools and increasing attendance. Improved conditions refer to farmers and their families being in a better position after the delivery of the project compared to those prior. Access refers to a means or opportunity to benefit from these projects. This definition may be superseded by local regulations and best practices where relevant.
Scope	All leaf suppliers', from whom Imperial sourced tobacco during the period under review, farmer's and worker's children based in countries in most need of support.
Reporting Period	2023
Unit	Number of beneficiaries (i.e., the number of suppliers' farmer's and families in tobacco growing communities)
Method	The methodology uses a combination of sustainability data from Maplecroft risk indices, insights from the Sustainable Tobacco Program (STP) ³ and supplier responses to Imperial's annual Livelihoods Survey.
	Relevant Maplecroft risk indices are used to identify Imperial's active sourcing countries in most need of support to improve access to childcare and education. Suppliers' farmer's and worker's children, based in these countries, are then considered for Imperial Leaf Partnership projects.
	The total number of beneficiaries with improved access to childcare and education because of these Imperial Leaf Partnership projects are calculated for this KPI, where the family size of a suppliers' farmer or worker is based on the average family size of the country.
	³ The Sustainable Tobacco Programme (STP) is an industry initiative which aims to help enhance agricultural supply chain due diligence and accelerate positive impacts on social and environmental footprints. Annual self-assessments are completed by suppliers online. This supplier data is substantiated by a third party, the STP Secretariat, which aims at improving data integrity and reflecting its intended purpose.
Third party data verification FY23	No

FARMER LIVELIHOODS & WELFARE

Number of farmers and families with improved access to clean water

Definition	Clean drinking water is defined as water that does not represent any significant risk to health over a lifetime of consumption. Improved sources include, but is not limited to, piped water, boreholes, tube wells, protected dug wells, protected springs, and packaged or delivered water. Access to clean water is assumed as use of an improved water source with a total collection time of a maximum of a 30-minute walk, for a round trip including queuing, or 1km. This definition may be superseded by local regulations and best practices where relevant.
Scope	All leaf suppliers', from whom Imperial sourced tobacco during the period under review, farmers and their families based in countries in most need of support.
Reporting Period	2023
Unit	Number of beneficiaries (i.e., the number of suppliers' farmers and their families)
Method	The methodology uses a combination of sustainability data from Maplecroft risk indices, insights from the Sustainable Tobacco Program (STP) ⁴ and supplier responses to Imperial's annual Livelihoods Survey. Relevant Maplecroft's risk indices are used to identify Imperial's active sourcing countries in most need of support to improve access to clean water. Suppliers' farmers based in these countries are then considered for Imperial Leaf Partnership projects. The total number of beneficiaries with improved access to clean water because of these Imperial Leaf Partnership projects are calculated for this KPI, where the family size of a suppliers' farmer or worker is based on the average family size of the country. ⁴ The Sustainable Tobacco Programme (STP) is an industry initiative which aims
	to help enhance agricultural supply chain due diligence and accelerate positive impacts on social and environmental footprints. Annual self-assessments are completed by suppliers online. This supplier data is substantiated by a third party, the STP Secretariat, which aims at improving data integrity and reflecting its intended purpose.
Third party data verification FY23	No

Number of farmers and families with improved access to sanitation and hygiene

Definition	Sanitation is defined as the use of improved facilities which are not shared with other households and where excreta are safely disposed in situ or transported and treated offsite. Improved sanitation facilities are those designed to hygienically separate excreta from human contact and ensure that excreta do not re-enter the immediate environment (at household, field, and accommodation level). Improved sanitation facilities include flush/pour flush to piped sewer systems, septic tanks, or pit latrines, ventilated improved pit latrines, composting toilets, or pit latrines with slabs. This definition may be superseded by local regulations and best practices where relevant.
Scope	All leaf suppliers', from whom Imperial sourced tobacco during the period under review, farmers and their families based in countries in most need of support.
Reporting Period	2023
Unit	Number of beneficiaries (i.e., the number of suppliers' farmers and their families)
Method	The methodology uses a combination of sustainability data from Maplecroft risk indices, insights from the Sustainable Tobacco Program (STP) ⁵ and supplier responses to Imperial's annual Livelihoods Survey. Relevant Maplecroft's risk indices are used to identify Imperial's active sourcing countries in most need of support to improve access to sanitation and hygiene. Suppliers' farmers based in these countries are then considered for Imperial Leaf Partnership projects.
	The total number of beneficiaries with improved access to sanitation and hygiene as a result of these Imperial Leaf Partnership projects are calculated for this KPI, where the family size of a suppliers' farmer or worker is based on the average family size of the particular country.
	⁵ The Sustainable Tobacco Programme (STP) is an industry initiative which aims to help enhance agricultural supply chain due diligence and accelerate positive impacts on social and environmental footprints. Annual self-assessments are completed by suppliers online. This supplier data is substantiated by a third party, the STP Secretariat, which aims at improving data integrity and reflecting its intended purpose.
Third party data verification FY23	No

Percentage of tobacco farmers growing complimentary crops

Definition	Complimentary crops are those the farmer grows alongside or in-between tobacco harvests, either for their own consumption or commercialization. This includes food crops such as maize, groundnuts, and supplementary crops such as cotton and timber. We request visibility on all types of complimentary crops grown and initiatives that support farmers growing these crops, such as through technical assistance. It is important for Imperial to have sight of the number of suppliers' contracted farmers growing complimentary crops, either independently or with supplier support, to assess food security and living standards.
Scope	12 priority countries, 8 global suppliers. Priority countries: Madagascar, Guatemala, India, Indonesia, Malawi, Honduras, Mozambique, Dominican Republic, Brazil, Philippines, Turkey, and Laos (as per the Leaf Sustainability Country Rating Model).
Reporting Period	2023
Unit	Suppliers' contracted farmers
Method	The methodology uses a combination of sustainability data from Maplecroft risk indexes, insights from the Sustainable Tobacco Program (STP) ⁶ and supplier responses to Imperial's annual Livelihoods Survey. Following a risk-based approach, 12 countries of Imperial's current sourcing footprint, are identified as priority.
	Data used in this indicator is based on supplier submissions for their operations in the 12 priority countries. The Imperial Leaf Sustainability Team review, analyse, and visualise the data submitted, which is then reviewed and confirmed by suppliers.
	For this KPI, the number of suppliers' contracted farmers, based in the priority countries, growing complimentary crops is calculated as a percentage of the total number of suppliers' contracted farmers, based in the priority countries.
	⁶ The Sustainable Tobacco Programme (STP) is an industry initiative which aims to help enhance agricultural supply chain due diligence and accelerate positive impacts on social and environmental footprints. Annual self-assessments are completed by suppliers online. This supplier data is substantiated by a third party, the STP Secretariat, which aims at improving data integrity and reflecting its intended purpose.
Third party data verification FY23	No

FARMER LIVELIHOODS & WELFARE

Percentage of tobacco farmers with access to initiatives to improve agricultural productivity Definition Productivity and efficiency initiatives enable farmers to increase efficiency of tobacco production, by reducing costs of production or improving yield and/or quality. We request suppliers disclose all their efforts to assist farmers improve agricultural productivity and efficiency, which covers enhancing mechanisation, provision of financing, training, or inputs such as fertilizer. It is important for us to know how many farmers are granted access to these initiatives to assess differing levels of supplier support for tobacco production, and therefore understand farmer income stability and future prospects. Scope 12 priority countries, 8 global suppliers Priority countries: Madagascar, Guatemala, India, Indonesia, Malawi, Honduras, Mozambique, Dominican Republic, Brazil, Philippines, Turkey, and Laos (as per the Leaf Sustainability Country Rating Model). **Reporting Period** 2023 Unit Suppliers' contracted farmers Method The methodology uses a combination of sustainability data from Maplecroft risk indexes, insights from the Sustainable Tobacco Program (STP)⁷ and supplier responses to Imperial's annual Livelihoods Survey. Following a risk-based approach, 12 countries of Imperial's current sourcing footprint, are identified as priority. Data used in this indicator is based on supplier submissions for their operations in the 12 priority countries. The Imperial Leaf Sustainability Team review, analyse, and visualise the data submitted, which is then reviewed and confirmed by suppliers. For this KPI, the number of suppliers' contracted farmers, based in the priority countries, with access to initiatives to improve agricultural productivity is calculated as a percentage of the total number of suppliers' contracted farmers, based in the priority countries. ⁷The Sustainable Tobacco Programme (STP) is an industry initiative which aims to help enhance agricultural supply chain due diligence and accelerate positive impacts on social and environmental footprints. Annual self-assessments are completed by suppliers online. This supplier data is substantiated by a third party, the STP Secretariat, which aims at improving data integrity and reflecting its intended purpose. Third party data verification FY23 Nο

FARMER LIVELIHOODS & WELFARE

Suppliers have corrective action plans for 100% of non-conformances (where required)

Definition	A Standard Operating Procedure (SOP) for addressing non-conformances is in place and has been implemented for all identified and confirmed non- conformances. The SOP consists of documenting, escalating, correcting, and following up on the non-conformance. A corrective action plan is an immediate short-term response taken that aims at restoring the situation to how it was before the adverse impact. As an example, if the non-conformance stems from a hazard, the corrective action will remove the hazard and/or the rightsholder to which it poses a risk.
Scope	Direct operations (i.e., suppliers based in Madagascar and Laos).
Reporting Period	2023, based on crop years that ended during the 2023 calendar year
Unit	Suppliers' corrective action plans
Method	An internally developed procedure is used to determine when corrective action plans are required for actual non-conformances, based on the nature of the actual non-conformance. An actual non-conformance within the leaf supply chain is one which was reported as potential, investigated and confirmed as a non-conformance.
	The methodology then calculates all actual non-conformances which have corrective action plans in place as a percentage of all actual non-conformances which require corrective action plans.
Third party data verification FY23	No

Suppliers have preventative action plans for 100% of non-conformances (where required)	
Definition	A Standard Operating Procedure (SOP) for addressing non-conformances is in place and has been implemented for all identified and confirmed non- conformances. The SOP consists of documenting, escalating, correcting, and following up on the non-conformance. A preventative action plan is a longer- term response that seeks to address the root cause of the non-conformance, based on the root-cause analysis. Actions are targeted to eliminate root causes, and therefore prevent further occurrence of the non-conformance. As a result, these actions tend to be part of a longer-term commitment, initiative or project that aims to bring about systemic and durable change.
Scope	Direct operations (i.e., suppliers based in Madagascar and Laos).
Reporting Period	2023, based on crop years that ended during the 2023 calendar year
Unit	Suppliers' preventative action plans
Method	An internally developed procedure is used to determine when preventative action plans are required for actual non-conformances, based on the nature of the actual non-conformance. An actual non-conformance within the leaf supply chain is one which was reported as potential, investigated and confirmed as a non-conformance.
	The methodology then calculates all actual non-conformances which have preventative action plans in place as a percentage of all actual non-conformances which require preventative action plans.
Third party data verification FY23	No

Percentage of leaf suppliers participating in STP

Definition	The Sustainable Tobacco Program (STP) is an industry initiative to enhance agricultural supply chain due diligence and accelerate positive impacts on social and environmental footprints. The framework brings together companies in a collaborative effort to develop innovative solutions that benefit all stakeholders. STP's goal is to improve livelihoods while operating within planetary boundaries and respecting human rights. The STP is governed by a steering committee made up of members. STP is operated and evolved by a secretariat. The committee works with the secretariat to continuously improve the framework.
Scope	All leaf suppliers, from whom Imperial sourced tobacco during the period under review.
Reporting Period	2023, based on crop years that ended during the 2023 calendar year
Unit	All leaf suppliers, from whom Imperial sourced tobacco during the period under review
Method	The number of leaf suppliers participating in STP (i.e., completing and submitting STP self-assessments) is calculated as a percentage of the total number of leaf suppliers.
Third party data verification FY23	No

Percentage net revenue from NGP Products

Definition	Refers to the percentage of net revenue from Next Generation Products (NGP). Net revenue comprising associated revenue less duty and similar items recognised across the Group.
Scope	The scope covers all NGP products including Vapour, Heated Tobacco, and Modern Oral Nicotine across the Group.
Reporting Period	1 October 2022 – 30th September 2023
Unit	Percentage
Method	Absolute NGP net revenue reported by the Group as at 30 September 2023, less absolute NGP net revenue reported by the Group as at 30 September 2021, divided by the absolute NGP net revenue at 30 September 2021.
Third party data verification FY23	Yes

Absolute and Relative Environmental Waste

Definition	A key element of our environmental approach is to minimise both total waste and the waste sent to landfill. This is also part of our focus on cost optimisation. In general, waste includes items such as tobacco, paper, packaging materials, glues, cellophane, filter tow, and cardboard. Where possible we seek to reduce, re-use and recycle waste. A small amount of waste is classified as hazardous. Hazardous waste is identified as being potentially harmful to the environment or to humans and its handling is guided by regulation such as the European Regulation on Classification, Labelling and Packaging (CLP Regulation). We also include offensive waste in our definition of hazardous waste, which includes medical or sanitary waste. The handling of waste is dependent on the geographical location.
Scope	The scope covers waste originating from manufacturing sites and main offices under our operational control but excludes waste reused both within our operations and externally.
Reporting Period	1 July 2022 – 30 June 2023
Unit for Absolute Waste	Tonnes
Unit for Relative Waste	Tonnes per £million tobacco and NGP net revenue
Method	Waste data is entered into the NFR system on a quarterly basis and consolidated ready for the Group ESG team to review. Waste data is reported by 13 waste types: Tobacco, Paper, Cardboard, Wood, Plastic, Glass, Metal, Other Non-Hazardous solid waste, Hazardous Solid, Hazardous Liquid, Operational write-offs, Non-operational write-offs and recalls, Construction Waste. The inputted data is based on weights provided by waste management companies, invoices, and internal computation. Estimated data is based on actual and assured numbers from the previous reporting period. Once available, estimated data is changed to actual data.
Third party data verification FY23	Yes

Absolute and Relative Environmental Waste to Landfill	
Definition	Waste sent to landfill is waste classified under local legislation as non-hazardous that we have been unable to recycle, reuse or incinerate for energy recovery. We have committed to send zero waste to landfill by 2025. Factories are reducing the amount of waste they send to landfill by reducing, reusing, recycling and where possible, composting. We are unable to use this disposal route in all countries.
Scope	All waste sent to landfill, and incineration without energy recovery is included in our definition of landfilled waste. The scope covers waste originating from manufacturing sites and main offices. Hazardous waste, including offensive waste such as medical and sanitary is excluded.
Reporting Period	1 July 2022 – 30 June 2023
Unit for Absolute Waste to Landfill	Tonnes
Unit for Relative Waste to Landfill	Tonnes per £million tobacco and NGP net revenue
Method	Waste data is entered into the NFR system on a quarterly basis and consolidated ready for the Group ESG team to review.
Third party data verification FY23	Yes



Landfill waste avoidance

Definition	The conscious and proactive effort to minimise the amount of waste that ends up in landfill. We have committed to send zero waste to landfill by 2025. Factories are reducing the amount of waste they send to landfill by reusing waste, recycling, composting, and incineration (with energy recovery).
Scope	The scope covers materials reused and waste recycled, composted, and incinerated (with energy recovery) originating from manufacturing sites and main offices. Compared to waste sent to landfill or incinerated without energy recovery. Hazardous waste, including offensive waste, is excluded
Reporting Period	1 July 2022 – 30 June 2023
Unit	Percentage/tonnes
Method	Data is entered into the NFR system on a quarterly basis and consolidated ready for the Group ESG team to review centrally. Landfill waste avoidance data is entered from data sources such as invoices. Calculated as (Total Waste diverted from landfill + waste reused)/(Total waste + Waste reused).
Third party data verification FY23	Yes

Waste Recycled	
Definition	Waste materials which have been reprocessed into products, materials, or substances whether for the original or other purposes. This includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations. For example: plastic, paper, carton board, cleaning solvents, and pallets sent to third parties to be recycled.
Scope	The scope covers waste originating from manufacturing sites and main offices.
Reporting Period	1 July 2022 – 30 June 2023
Unit	Percentage/ tonnes
Method	Data is entered into the NFR system on a quarterly basis and consolidated ready for the Group ESG team to review.

Third party data verification FY23 No

Reusable, recyclable, or compostable packaging waste	
Definition	A key element of our environmental approach is ensuring all our packaging is reusable, recyclable, or compostable. We are assessing the recyclability of every packaging type on sale to identify where we can improve. All our packaging will be recyclable by 2025, and we will also have a recycling recovery score of at least 80% by 2030. The recycling system we are assessing against is the German sorting and recycling system.
Scope	All packaging sold in the EU and UK produced in-house operations.
Reporting Period	1 July 2022 – 30 June 2023
Unit	Percentage
Method	Packaging samples are provided to an external agency which accesses the recyclability (how much material in % of the total packaging can be recovered during the recycling process) of our packaging and certifies it.
Third party data verification FY23	No



Sustainably sourced wood fibre in our packaging

Definition	Sustainably Sourced means that all wood fibres used in packaging or print applications are sourced entirely from FSC (Forest Stewardship Council) or PEFC (Programme for the Endorsement of Forest Certifications) certified forests or any other equivalent specification, that has been approved by Imperial. We have committed to source 100% of the wood fibre in our packaging sustainably by 2025. This includes all the types of packaging related to wood such as, paper, card, and cardboard used in our consumer, sales, and shipping units.
Scope	In scope is all packaging sold in the globally produced in-house operations.
Reporting Period	1 July 2022 – 30 June 2023
Unit	Percentage
Method	All suppliers supplying wood fibre-based materials used in packaging or print applications are asked to sign an agreement confirming the material is sourced according to our definition of sustainable sourcing prior to the material being delivered. This agreement is stored centrally with the bill of materials and is managed by the Packaging & Print Specification team.
Third party data verification FY23	No

Operations with ISO 14001 at the time of reporting

Definition	We approach the improvement of environmental performance through risk management, employee training, performance reporting, audits, and improvement planning. This is structured by application of formal environmental management systems which are subject to an annual independent audit by external certification companies, to help drive continuous improvement. We have selected the international standard ISO 14001 as the most appropriate standard for guiding the development of our environmental management systems.
Scope	The scope covers all manufacturing sites including cigarette, other tobacco products (OTP), cigar, tobacco leaf processing, paper, and tube operations. It excludes laboratories, main offices, Sales and Marketing entities, distribution centres, leaf warehouses, farms, and joint ventures.
Reporting Period	As of end of financial year 30 September 2023
Unit	Percentage
Method	Through the NFR system, information on the occurrence of ISO 14001 environmental management system certifications is collated centrally on an annual basis. The Group ESG team calculates the percentage by dividing the number of certifications by the number of operating sites within the scope. NFR users at the site are required to upload the current certificate.
Third party data verification FY23	No

Absolute and relative energy consumption	
Definition	Our operations use energy to generate light, heat, power, cooling, refrigeration, and steam, and to run compressors. These originate from a variety of sources including fossil fuels and renewable sources. The electricity we use is sourced from a combination of grid electricity and green energy suppliers.
Scope	All sites over which we have operational control, including factories, main offices, sales fleets and the farms in Madagascar. It excludes only sites deemed de minimis, or those outside of our operational control.
Reporting Period	1 July 2022 – 30 June 2023
Unit for Absolute Energy Consumption	GWh
Unit for Relative Energy Consumption	KWh per £million tobacco and NGP net revenue
Method	Energy usage data is collated monthly at entity level and entered in the NFR System. The Group ESG team collate and review the data centrally. Energy usage is entered from data sources such as invoices and where not available meter readings and usage-records.
	When actual data is not available, we use estimates based on the previous reporting period. All estimation methodology is shared as part of the assurance process, and updated to actual if the data is available prior to assurance.
Third party data verification FY23	Yes

Percentage of purchased grid electricity from renewable sources

Definition	Purchased electricity that is delivered to sites via national grids may be generated from fossil and renewable sources. Renewable sources are where the site has entered into a contractual arrangement with the supplier for renewable electricity or where Renewable Energy Certificates (RECs) have been purchased. RECs are purchased from within the same 'market-boundary', as defined by CDP, as the site consuming the electricity, where available, otherwise from a nearby geographical country with a connected grid.
Scope	The scope covers electricity that is generated by a third party and delivered via a national grid system. Electricity generated on-site is out of scope.
Reporting Period	1 July 2022 – 30 June 2023
Unit	Percentage
Method	Grid Electricity usage data is collated monthly at site level and entered in the NFR System. The Group ESG team collate and review the data centrally. Electricity usage is entered from data sources such as invoices and where not available meter readings, and usage-records. Contractual arrangements to identify renewable sources are obtained from Group Procurement, and RECs are obtained from our third-party provider. Calculated as Renewable grid electricity/ total grid electricity.
Third party data verification FY23	Yes

Third party data verification FY23

Percentage of energy from renewable sources	
Definition	The energy we use is either purchased or generated on-site. Purchased energy is delivered to sites and can be generated renewably, or from fossil fuels. On-site energy generation can be through the use of a generator, or on-site renewables. We purchase renewable energy by entering a renewable energy contract with suppliers, purchasing Renewable Energy Certificates (RECs) or using on-site renewables to generate energy. RECS are purchased from within the same 'market-boundary', as defined by CDP, as the site consuming the electricity, where available, otherwise from a nearby geographical country with a connected grid.
Scope	All Energy consumed within our sites and sales fleets, whether purchased or generated on site. Sites considered out of scope are either out of operational control or deemed de minimis.
Reporting Period	1 July 2022 – 30 June 2023
Unit	Percentage
Method	Energy consumption is collected monthly at site level and entered into the NFR system. The Group ESG team collate and review the data centrally. Energy consumption is collected from data sources such as invoices and meter readings and where no available meter readings, stock-records, and usage-records. Contractual arrangements to identify renewable sources are obtained from Group Procurement, and RECs from our third-party provider. Calculated as Renewable energy/ total energy consumption.
Third party data verification FY23	Yes

Compliance with UK Streamlined Energy and Carbon Reporting (SECR) Regulations

Definition	As a UK listed company, we are required to report on the energy consumption and associated emissions of our 'UK & offshore area', separately, and in comparison, to our global energy consumption, and related emissions. The 2018 Regulations are designed to increase awareness of energy costs within organisations, provide data to inform adoption of energy efficiency measures and help to reduce impact on climate change. They also seek to provide greater transparency for stakeholders.
Scope	Our scope of reporting against the SECR comprises of energy consumption (Scope 1 & 2) from our UK Head Office and UK Sales in Bristol, Nottingham site, London Hub and our Liverpool innovation centre. The data from our Republic of Ireland Sales office and the Ireland sales fleet is considered de minimis.
Reporting Period	1 July 2022 – 30 June 2023
Unit energy consumption UK & offshore area	kWh
Unit relative energy consumption	kWh/ £m net revenue
Unit Emissions UK & offshore area	CO2e
Relative Emissions UK & offshore area	CO2e/ £m net revenue
Method	Data is collected in the NFR system monthly. NFR users are required to enter volume data for the consumption of petrol or gasoline; LPG; and diesel. The Group ESG team collate and review the data centrally. Sales and Marketing entities submit fuel type and litres consumed for this calculation, which is converted to GWh using the DEFRA Lower Calorific Value. Revenue figures are provided for the financial year by group finance.
Third party data verification 2023	No

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Absolute & Relative CO₂ Equivalent Emissions

Definition	As part of our commitment to tackle climate change, we monitor energy and HFC refrigerant usage to calculate our carbon dioxide equivalent emissions with a view to target reductions. We report in line with the Global Greenhouse Gas Protocol on scope 1 (direct) and scope 2 (indirect). In line with the latest guidance, we use two different reporting methodologies to report on Scope 2: location based (using national grid factors) and market based, where we account for the purchase of Renewable Energy Certificates (RECs).
Scope	Our reported emissions include all main sources from manufacturing sites over which we have operational control, our sales fleets, and our main offices. Operations not included are only those deemed de minimis which relate to the small sales offices, or warehouses which are immaterial to our total Scope 1 (direct) and 2 (indirect) emissions. In compliance with UK Mandatory Greenhouse Gas (GHG) emissions reporting regulations, we report on GHG emissions resulting from our tobacco operations which fall within our operational control. Our Scope 1 emissions comprise of: emissions from stationary fuel combustion at our sites; emissions from mobile fuel combustion in our fleet of company vehicles;
	leakage of refrigerant gases; and process emissions from the Dry Ice Expanded Tobacco process related to tobacco expansion. Our Scope 2 emissions comprise of the indirect emissions resulting from the use of purchased electricity (including green energy), purchased heat and steam for our sites.
Reporting Period	1 July 2022 – 30 June 2023
Unit for Absolute CO₂e Emissions from Energy Consumed	Tonnes
Unit for Relative CO2e Emissions from Energy Consumed	Tonnes per £million Tobacco and NGP net revenue
Method	Energy usage data is collated monthly at entity level and entered in the NFR System for automated emissions calculation. Group ESG collate and review the data centrally. Energy usage is entered from data sources such as invoices and where not available meter readings, stock-records, and usage-records.
Method	System for automated emissions calculation. Group ESG collate and review the data centrally. Energy usage is entered from data sources such as invoices and
Method	System for automated emissions calculation. Group ESG collate and review the data centrally. Energy usage is entered from data sources such as invoices and where not available meter readings, stock-records, and usage-records. We report Scope 1 and Scope 2 CO2 emissions for which we are responsible using a methodology based on the GHG Protocol Corporate Accounting and Reporting Standard (revised edition). As such, we report on the seven main greenhouse gases and report in terms of tonnes of CO2 equivalents (t CO2e). We report Scope 2 location-based and market-based emissions according to the
Method	System for automated emissions calculation. Group ESG collate and review the data centrally. Energy usage is entered from data sources such as invoices and where not available meter readings, stock-records, and usage-records. We report Scope 1 and Scope 2 CO2 emissions for which we are responsible using a methodology based on the GHG Protocol Corporate Accounting and Reporting Standard (revised edition). As such, we report on the seven main greenhouse gases and report in terms of tonnes of CO2 equivalents (t CO2e).

Renewable Energy Site

Definition	Imperial Brands defines a site as a renewable energy site (or carbon neutral) if the site uses only renewable energy for its direct operations, excluding minor applications such as emergency systems, when they do not exceed 1% of the total energy use of the site. At Imperial Brands, we understand renewable energy sites as an intermediate step in our journey towards being a Net Zero company.
Scope	All sites over which we have operational control.
Reporting Period	1 July 2022 – 30 June 2023
Unit	Number
Method	Imperial Brands defines a renewable energy site if the site uses only renewable energy for its direct operations, excluding minor applications such as emergency systems, when they do not exceed 1% of the total energy use of the site.
Third party data verification FY23	No

Absolute Scope 3 CO ₂ equivalent	emissions
Definition	Scope 3 emissions are all indirect emissions (not included in scope 2) that occur in the value chain of the reporting company, including both upstream and downstream emissions. An independent carbon life cycle analysis (LCA) conducted across our value chain identified that around 89% of our total carbon footprint is attributed to our Scope 3 emissions. Some examples of scope 3 activities are extraction and production of purchased materials; transportation of goods; and use of products and services.
Scope	In 2017, we undertook an independent review of all 15 Scope 3 categories of the Greenhouse Gas (GHG) Protocol to determine where our greatest carbon impacts are. The analysis demonstrated that our most significant carbon impacts came from just three categories, re-confirmed with our re-calculation in 2023: Category 1 Purchased Goods and Services which account for around 65% of our Scope 3 emissions; Category 2 Capital Goods which account for 8% and is mainly related to the purchase of new machineries and Category 4 Upstream transportation and distribution which account for around 7% of Scope 3 emissions. Based on our business model, we are not reporting on Categories 8; 10; 13 and 14. Based on our analysis we have set the following target for Scope 3 emissions which is currently being reviewed by the Science Based Targets Initiative: We commit to reduce absolute Scope 3 emissions by 50% by 2030 from a 2017 baseline year, and to be Net Zero in our entire value chain (scope 1,2 &3) by 2040.
Reporting Period	1 July 2022 – 30 June 2023 for business travel, 1 October 2022 to 30 September 2023 for all other categories
Unit	Tonnes CO2e
Method	We follow the Corporate Value Chain (Scope 3) Accounting and Reporting Standard and its principle of Relevance; Completeness; Consistency; Transparency and Accuracy. In 2023, we recalculated our scope 3 baseline, and calculated for the first time our scope 3 emissions for Financial Year 2022 based on the calculation in the 2017 model that was completed by an independent expert agency. This quantification methodology for data collection multiplies activity data by an emission factor. We use specific life cycle emission factors for our Scope 3 calculation related to fuels and energy consumed in our value chain.
Third party data verification FY23	No

Scope 3 CO₂ equivalent emissions – Business Travel

Definition	Business travel scope 3 emissions include emissions associated with travel undertaken for work or business purposes.
Scope	Business travel is tracked through a Group-wide agreement with a third-party global expense booking system provider. The system records details of air and rail travel taken during the reporting period indicated which is converted into CO2e emissions in line with the GHG Protocol for Scope 3 business travel, distance- based method. Hotel stays or car travel are not tracked in the system, and therefore are out of scope. Only bookings for those countries having access to the global booking system provider are in scope. Markets that have not yet access to the global booking system are the following: Burkina Faso; Ivory Coast; Mali; Niger; Central African Republic; Chad; Congo Brazzaville; La Reunion; Malawi. For bookings made outside the system provider including rail and air travel, we
	use a spend-based approach. This is the case for the following countries: USA; UK; Germany; Poland; Spain; Australia; Portugal; New Zealand; Netherlands; France; Luxemburg; Belgium.
Reporting Period	1 July 2022 – 30 June 2023
Unit	Tonnes CO₂e
Method	Data reported through the booking system is converted to tonnes CO ₂ e using the UK Government GHG Conversion Factors for Company Reporting, managed by DEFRA, which is updated annually. The most recent emission factor is used to convert data for the whole reporting period.
	Air travel is separated into eleven categories based on domestic, international, distance travelled and travel class. For rail travel there are three categories based on international and national rail travel as well as the EPA factor for rail travel within the USA.
	The kilometres travelled are calculated using a formula based on the distance travelled between two locations derived from the longitude and latitude of each location and the conversion from miles into kilometres.
	For bookings outside the booking system provider, we use the spend-based approach due to a lack of distance data. We multiple spend for each rail and air travel with the respective emission factors.
Third party data verification FY23	Yes

Key Suppliers with Science Based Targets (SBT)

Definition	An independent carbon life cycle analysis (LCA) conducted across our value chain identified that around 89% of our total carbon footprint is attributed to our Scope 3 emissions. Scope 3 emissions are a consequence of the activities of our business but occur from sources not owned or controlled by the company. Category 1: Purchased goods and services contributes 65% of our Scope 3 emissions, and therefore is a key focus point for engagement of partners to reduce emissions.
Scope	We undertook an independent review of all 15 Scope 3 categories of the Greenhouse Gas (GHG) Protocol to determine where our greatest carbon impacts are. The analysis demonstrated that our most significant carbon impacts came from just three categories: Category 1 Purchased Goods and Services which account for around 65% of our Scope 3 emissions; Category 2 Capital Goods which account for 8% and is mainly related to the purchase of new machineries and Category 4 Upstream transportation and distribution which account for around 7% of Scope 3 emissions. Based on this analysis we have set the following targets for our suppliers which have been validated by the Science Based Targets Initiative: We commit that 50% of our suppliers by spend covering Category 1. Purchased Goods and Services will have science-based targets by 2024; and We commit that 100% of our suppliers covering Category 15. Investments, will have science-based targets by 2024.
Reporting Period	1 October 2022 – 30 September 2023
Unit	Percentage
Method	We invite all our key suppliers to participate in the annual CDP Supply Chain Programme. Through this platform suppliers disclose key environmental information including: their Scope 1 and 2 emissions, the targets they have set and their environmental risks. They can also suggest collaborative opportunities for us to work on together to reduce environmental impacts. The CDP output enables us to determine what percentage of our suppliers in Category 1. Purchased Goods and Services have set a science-based target. We are able to map these suppliers to spend within the PGS category using procurement spend data.
Third party data verification FY23	No

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Absolute and Relative Water Consumption

Definition	Our water consumption figure reflects water withdrawal, both from water provided by suppliers and water we extract from natural sources. Our total water consumption represents the amount of water that is drawn into the boundaries of the organization from all sources for any use over the course of the reporting year.
Scope	All sites over which we have operational control. Our tobacco farms in Madagascar are excluded. Other sites are excluded according to the de minimis rule, or where we do not have operational control.
Reporting Period	1 July 2022 – 30 June 2023
Unit for absolute water consumption	Cubic meters (m3)
Unit for Relative Water Consumption	Cubic metre (m3) per £million tobacco and NGP net revenue
Method	Our absolute water consumption represented the total amount of water that is withdrawn into the boundaries of our organization. Water usage information is collected monthly at entity level using meter readings, invoices, extracted water measurements and usage records, as appropriate for the site. Data is entered into the NFR System for central collation and review by the Group ESG team. Sources of water withdrawals are municipal or mains water, surface water, ground water and rainwater.
Third party data verification FY23	Yes

VII.

COMMUNITY INVESTMENT

Community Investment (Allocations)

Definition	On a voluntary basis we seek to support several communities in which we operate and from where we source tobacco. This is through community and sustainability related projects which provide benefits over and above those are brought by our normal commercial operations and transactions. The term 'community investment' covers funds which are allocated to not-for-profit partnerships, community and sustainability related projects and charitable donations.
Scope	 The Eliminating Child Labour in Tobacco Growing Foundation (ECLT) and Hope for Justice. Leaf Partnerships, which predominately addresses farmer viability, rural incomes, and environmental sustainability issues in prioritised tobacco- growing communities, and A reserve for ad hoc allocations and requirements, such as in response to a humanitarian disaster. The allocations are predominately facilitated by the UK Charities Aid Foundation (CAF), which provides banking facilities and verifies charitable organisations. The main exception in the use of CAF is for the Leaf Partnerships, where project costs with suppliers are charged directly against the cost of leaf. Local market or cluster community investments, approved centrally according to our business approvals process, and in line with our community investment guidance and code of conduct and payments are dealt with at local level. We refer to allocations rather than actual spend, because the time at which funds are spent within a project may occur later than within the current financial year. The financial value of the Community Investment spend does not include employee time, in-kind contributions, management costs or other community support that may be provided by any budget holder within our Group, at a local level.
Reporting Period	1st October 2022 to 30 September 2023
Unit	Reported in UK Sterling Millions of Pounds (£m)
Method	 The financial value for the Community Investment allocations made within the financial year is extracted from our financial reporting and accounting system by Group Finance and checked against the Business Approval Process system for financial allocation. In kind donations are also recorded on an ad-hoc basis in FY23 donations were made of furniture and equipment to a National Charity following our Bristol office refurbishment. The charity calculated the monetary value (based on purchasing goods new) which we include in our reporting. All allocations are to £m British Sterling and where applicable utilise the Group's defined average exchange rate for the period in question.
Third party data verification FY23	No
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