Imperial Brands PLC

International Marketing Code



IMPERIAL BRANDS

› IMPERIAL BRANDS PLC INTERNATIONAL MARKETING CODE

IMPERIAL BRANDS PLC's Products are intended only for existing adult consumers of tobacco and recreational nicotine products. We have a responsibility towards our Adult Consumers, which is reflected in the quality of our Products—and in the way we communicate through our marketing efforts.

We apply this International Marketing Code to consumer advertising, promotional materials, and activities for all our Products. This Code replaces previous versions and underpins our commitment to market and advertise our Products responsibly to Adult Consumers across our Group Companies.

We believe in:

- Offering Adult Consumers a broad range of Combustible Tobacco Products, Smokeless Products, and Accessories to meet their preferences.
- Providing Adult Consumers with clear and accurate information to support informed choices, including, where appropriate, the relative risks of Smokeless Products.
- The tobacco harm reduction potential of Smokeless Products and alternatives to Combustible Tobacco Products, which can make a significant contribution to harm reduction when supported by scientific evidence.

This International Marketing Code shall not apply to any pharmaceutical products licensed by medicines authorities. All Group Companies, employees, and anyone working on our behalf (including advertising, promotion, research agencies, and other organizations engaged in consumer marketing for our Products) must adopt and apply this Code in good faith.

Where we market products in countries with stricter marketing standards, codes of practice, statutes or regulations, or voluntary agreements (Local Stricter Standards) than those set out in this Code, the local Group Company will ensure that local employees, and anyone working on behalf of the local Group Company (including advertising, promotion, research agencies, and other organizations engaged in consumer marketing for our Products in that country) must adopt and apply the Local Stricter Standard in good faith. Regular training for relevant staff will be provided.

This Code has been approved by the Imperial Brands Plc Chief Executive Officer on 23rd September 2026 and is owned by the Chief Consumer Officer.

› ADULTS ONLY - RESPONSIBLE MARKETING

We shall:

- Only market our Products with advertising and promotional materials or activities which are targeted at Adult Consumers.

We believe:

- Our Products are intended for Adult Consumers. We strongly support measures to prevent Youth access and initiation to our Products and support effective legislation and regulation to prevent Youth purchase and use.
- Where no age restrictions are in place, we will engage with regulators for a minimum legal age for sale of 18.
- Any person in our advertising and promotional materials must appear to be at least 25 years old.

PRINT ADVERTISING

We will only place our Products' brand advertising in printed media where we can reasonably establish that the intended audience are predominantly Adults.

OUTDOOR ADVERTISING

We will not place Products' brand advertising on outdoor signs or billboards positioned within 100 meters of main school entrances. This excludes outdoor signs at a point of sale, adult educational establishments, or our own offices and factories.

RADIO, TELEVISION AND CINEMA ADVERTISING

Where advertising of our Products is permitted:

- on radio and television, we will only place advertising of branded Products during those hours when the programming is directed predominantly at Adults; and
- in cinemas, we will only place advertising of branded Products where the advertisement is adjacent to films where the audience is likely to consist predominantly of Adults.

DIRECT MARKETING

We will conduct direct marketing activities only with verified Adult Consumers.

DIGITAL, ON-DEMAND & STREAMING MARKETING

We will only place Products' brand advertising on internet sites, gaming consoles, streaming platforms, mobile apps or connected devices including smartphones where:

- The content is intended for Adults;
- We can reasonably establish that the audience is predominantly Adult; and
- Advertising is clearly identified, including where agencies act on our behalf.

Our own websites and apps for our Products are intended for Adult Consumers and we will ensure that

- they are Age Gated; and
- online sales of Products are restricted to Adult Consumers.

SOCIAL MEDIA

We will only carry out social media marketing activities:

- In a responsible manner and in accordance with our Code of Conduct.
- Where permitted under local Legal Requirements.
- Where we are clearly identified, including agencies or influencers acting on our behalf.
- With influencers whose followers are predominantly Adults.

PROMOTIONAL EVENTS AND ACTIVITIES

Where permitted, we will only conduct events and activities designed to appeal to Adult Consumers.

SPONSORSHIP

Where Products' brand Sponsorship activities are permitted, we will only conduct such activities where we have satisfactory evidence that:

- sponsored individuals, competitors, and team members are Adults; and
- that the sponsored event, activity, team members, or individual predominantly appeal to Adults.

YOUTH ACCESS PREVENTION

We will encourage retailers to:

- Maintain signage restricting sales to Adults.
- Carry out ID checks for anyone who appears underage.

PRODUCT MARKET RESEARCH

We will only conduct or commission research among Adult Consumers

› RESPECTING CONSUMER CHOICE & TRANSPARENCY

We believe:

- Adult Consumers should have access to a broad range of Products— including Combustible Tobacco Products, Smokeless Products, and Accessories — to meet their preferences.
- In the tobacco harm reduction potential of Smokeless Products and commit to marketing our Products responsibly.
- In providing Adult Consumers with the information necessary to make informed decisions.

We will:

- Target the marketing of our Products to Adult Consumers.
- Not encourage anyone who is not already a consumer of tobacco and / or recreational nicotine products to become a consumer of Products covered by this Code.
- Not discourage existing consumers from ceasing consumption.
- Provide clear and accurate information about our Products, including relative-risk information for Smokeless Products where appropriate.

STYLE AND CONTENT OF ADVERTISING

Our consumer advertising and promotional materials (including their content) will:

- Be aimed at existing Adult Consumers to inform them of product and brand options.
- Describe our Products in a fair and honest way that will not mislead Adult Consumers.
- Only make statements about quality, performance, or functional attributes when supported by robust evidence and avoiding claims that any Product is risk free.
- Never suggest that consumption enhances popularity, success, or attractiveness.
- Adhere to contemporary standards of good taste and demonstrate sensitivity to local cultures and attitudes.

› HEALTH WARNINGS

HEALTH WARNINGS

- All packaging and permitted advertising for Combustible Tobacco Products and Smokeless Products will carry health warnings as required by law.
- Where no Legal Requirements exist, commonly used health warnings will be applied.
- Accessories will not carry health warnings unless required by law.

PRODUCT PLACEMENT & BRAND PROTECTION

- We will not pay for placement of our Products or brands in films, TV, or entertainment media.
- We will take reasonable steps to prevent unauthorized use of our trademarks and designs.

› DEFINITIONS

ACCESSORIES
Items used for the consumption of Combustible Tobacco Products or Smokeless Products, for example rolling papers, filters, tubes, e-vapour or heated tobacco devices.

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

ADULT CONSUMER
Adult consumer of Products covered by this International Marketing Code.

ADVERTISING
Any consumer advertising/promotional materials, activities, and events relating to our Products aimed at encouraging Adult Consumers to select one brand over another.

AGE GATED
Any online or offline verification mechanism which confirms that a consumer is an Adult, including for the online purchase of our Products.

COMBUSTIBLE TOBACCO PRODUCTS
Products that consist wholly or partially of tobacco and which are consumed involving a combustion process.

DIGITAL, ON-DEMAND & STREAMING MARKETING
The promotion of brands, products, or services through digital channels including websites, mobile apps, social media platforms, streaming services, digital out-of-home (DOOH) displays, and connected devices like smartphones, tablets, and gaming consoles.

GROUP COMPANY / COMPANIES
Where we have a controlling interest, for example, where we have more than 50% of (a) the shares and/ or (b) voting rights.

LEGAL REQUIREMENTS
Local laws, local / national countries’ codes of practice and / or voluntary agreements, including local marketing standards, governing our Products.

PRODUCTS
a) Combustible Tobacco Products,
b) Smokeless Products, and
c) Accessories

PROMOTIONAL EVENTS & ACTIVITIES
Ranges of events and activities organized by or on behalf of our Group Companies, created specifically to raise awareness of a particular brand of Products among Adult Consumers, and which would not take place without the support of Group Companies. These do not include:

- Pre-arranged events for which organizers subsequently sought our support and whose success does not depend solely on us, provided no Product brand promotion occurs; or
- Corporate events and activities where no tobacco or nicotine brand promotion is intended.

SMOKELESS PRODUCTS*
- Products which are intended to be consumed without a combustion process, and which have the potential to reduce the risk of disease caused by smoking.

  *No reduced risk or smoke-free marketing claims will be made in jurisdictions where such claims are restricted, unless there is an applicable regulatory framework permitting their use.

SPONSORSHIP
An event, activity, or team to whom our Group Companies provide support to raise awareness of a particular Product and / or brand among Adults, but without which support the event, activity, or team would still exist or take place.

YOUTH
Anyone who is not an adult.

Registered Office
Imperial Brands PLC
121 Winterstoke Road
Bristol BS3 2LL UK

www.imperialbrandsplc.com



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