IMPERIAL BRANDS

A SHARED COMMITMENT TO BUSINESS PRACTICES THAT PROTECT PEOPLE AND OUR PLANET

OUR SUPPLIER CODE OF CONDUCT

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At Imperial Brands, our global reputation as a trusted and ethical partner and employer is one of our most valuable assets.

We are committed to operating responsibly in everything we do, respecting people, our communities, and the planet. We have firm targets in place to ensure we achieve these ambitions and part of that commitment is working with trusted suppliers to source products and services in a compliant, sustainable and socially conscious manner.

This Supplier Code of Conduct sets out the minimum standards of behaviour we expect from all Imperial Brands suppliers. It was updated in 2023 to reflect the sustainability commitments we have made as part of our ESG strategy.

Our ambition doesn't stop at minimum standards. We will look to address activities that we think may breach the Code and we encourage all our suppliers to seek opportunities to go beyond the expectations outlined in this Code so we can, together, make a positive social and environmental impact.

We also ask that if you have a genuine concern or suspect that a breach of the law has taken place, you speak up. You can contact us at:

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

ITG Brands have a distinct reporting line:

ITG Brands Speaking Up
714 Green Valley Road
Greensboro, NC 27408
Tel: +1 866 447 6092

Or, raise your concern confidentially using our online Speaking Up service.

We're committed to this journey and making a positive difference. Join us.

Javier Huerta
Chief Supply Chain Officer

INTRODUCTION

Our Supplier Code of Conduct ("the Code") sets out the standards of behaviour we expect of Imperial Brands suppliers – those companies, service providers and business partners that engage in a direct business relationship with Imperial Brands and our subsidiaries.

The Code defines our responsible sourcing guiding principles set out below and articulates how we work with our suppliers to source products and services in a compliant, sustainable and socially conscious manner.

The Code covers three areas:

1. Business Integrity – Our suppliers are expected to conduct their business in an ethical and responsible manner and comply with all applicable laws and regulations.

2. Human Rights & Diversity, Equity and Inclusion (DEI) – Our suppliers are expected to provide a fair and safe workplace, and demonstrate respect for human rights, diversity, equity, and inclusion.

3. Environmental Sustainability – Our suppliers are expected to adopt policies and practices that protect the planet and reduce negative impacts on the environment.

WHAT WE EXPECT

We expect our suppliers to meet the minimum standards outlined in the Code – and go further, where possible or required by contractual agreement. We also expect our suppliers to endeavour to ensure that their own business partners meet standards comparable to those set out in the Code.

- Imperial Brands takes a 'continuous improvement' approach to the implementation of these standards. We expect our suppliers to be able to demonstrate that they operate in a manner consistent with the Code. Where a breach is suspected, we may request the supplier to cooperate with an internal or external review and to make improvements.
- We all benefit from responsible behaviour as it is key to maintaining a functioning society and protects both our reputation and yours. Conformance with the Code, and a supplier's willingness to address deficiencies, will be key to our decision to engage in, or continue, a business relationship.
- If you have any questions about the information in the Code and what is expected of you, contact your local procurement representative.
- If you observe or suspect any behaviour that is not consistent with the Code, we encourage you to speak up.
- Our Speaking Up service is available to our own employees and all external stakeholders, including our suppliers and their employees. We encourage you to promote our Speaking Up service to your employees and any third parties working on behalf of Imperial Brands.
- You can read more about our approach to Speaking Up and our non-retaliation policy in our Speaking Up Policy.

OUR RESPONSIBLE SOURCING GUIDING PRINCIPLES

We ask our suppliers and partners to join our shared commitment.

1

We are committed to complying with all applicable laws and regulations.

2

We are committed to acting responsibly and with integrity in all areas of our business.

3

We are committed to respecting human rights and diversity, equity and inclusion (DEI), including the right to a fair, healthy and safe workplace for all.

4

We are committed to sourcing goods and services in an environmentally conscious and responsible manner, whilst collaborating with our suppliers to ensure continuous improvements in our sustainability efforts.

OUR MINIMUM STANDARDS

This section of the Code summarises the minimum standards expected of Imperial Brands suppliers. Further detail is in the next section.

Business Integrity:

- **Anti-bribery, corruption and tax evasion:** Act with integrity and comply with anti-bribery and corruption laws.
- **Gifts and hospitality:** Never offer or accept gifts, entertainment, or hospitality that is, or may be viewed as, an attempt to influence business decisions. Do not offer gifts or hospitality to public or government officials unless lawful and approved in advance.
- **Conflicts of interest:** Inform us of any actual or potential conflicts of interest.
- **Confidentiality and privacy:** Safeguard our confidential and personal information and notify us in the event of a breach or suspected breach.
- **Responsible marketing:** Do not advertise or market our products to non-smokers or those under 18 years of age (or the local legal minimum age if higher). Comply with Imperial Brands Marketing Standards where applicable.
- **Illicit trade:** Do not engage in or support illicit trade.
- **Fair competition and anti-trust:** Comply with all applicable anti-trust and competition laws; do not share our proprietary or confidential information.
- **Sanctions and export controls:** Understand and comply with all sanctions laws and export controls relevant to your business and the supply of any goods and services to Imperial Brands.

Human Rights and Diversity Equity and Inclusion (DEI):

- **Child labour:** Suppliers must not employ any child under the age of 13 and must not employ any person younger than the minimum local legal working age. Protect children from hazardous work as well as slavery, trafficking, and sexual exploitation.
- **Modern slavery, forced labour and human trafficking:** All work must be performed voluntarily. Do not employ any worker on the basis of fees or debt bondage. Allow all workers to retain identification and personal documents. Respect freedom of movement.
- **Working hours, wages and benefits:** Ensure that hours and remuneration are reasonable and aligned with local laws. Pay workers on time and provide all required leave.
- **Fair treatment, diversity, equity and inclusion:** Treat all employees with dignity, respect and fairness. Promote diversity, equity and inclusion in employment, promotion, and management representation.
- **Freedom of association:** Respect the right of employees to join or form trade unions and bargain collectively.
- **Grievance mechanisms and remedies:** Where possible, provide employees with a confidential channel to report complaints and grievances, without fear of retaliation or reprisal.
- **Health and safety:** Comply with all applicable health and safety laws and regulations in the workplace. Ensure facilities are clean and safe, and provide workers with appropriate training and equipment.

Environmental Sustainability:

- **Environmental laws:** Comply with environmental laws and regulations relevant to your business. Report any incidents or unsafe conditions to the local authorities and/or Imperial Brands Speaking Up service.
- **Continual improvements:** Familiarise yourself with Imperial Brands' ESG strategy and look for ways to advance our environmental goals and protect the planet.

BUSINESS INTEGRITY

Acting responsibly and with integrity has allowed Imperial Brands to create and sustain a successful business. We value the trustworthy and reliable partnerships we have with suppliers that enable us to hold both ourselves and our business partners accountable for conducting our business professionally and ethically.

As an Imperial Brands supplier, we expect you to adhere to the following standards, but in all cases you must meet local law as a minimum standard:

Anti-bribery, Anti-corruption & Tax evasion

- Share our zero-tolerance approach to bribery and corruption in all business interactions and comply with anti-bribery and corruption laws. We will exercise our rights to require corrective action from and to discipline suppliers who engage in corrupt activities, including termination of contractual arrangements.
- Never offer, pay or accept a bribe.
- Do not offer or give anything of value (no matter how small) to anyone which is intended to improperly secure, retain, or facilitate business (such as payments to reduce taxes or customs duties).
- Report any bribery or corruption concerns to Group Legal or local legal teams, at SpeakUp@impbrands.com or confidentially using our online Speaking Up service.

Gifts, Entertainment & Hospitality

- Imperial Brands' Gifts and Entertainments Guidelines permit the giving and receiving of reasonable and proportionate gifts, entertainment and hospitality to and from third parties in order to build goodwill in our business relationships.
- Never offer gifts, entertainment, or hospitality to our employees or accept gifts, entertainment, or hospitality that is intended to, or may be viewed as, an attempt to improperly influence business decisions.
- Never provide gifts, entertainment, or hospitality to public or government officials, except where it is lawful and has been authorised.

> **Share our zero-tolerance approach to bribery and corruption in all business interactions and comply with anti-bribery and corruption laws**

BUSINESS INTEGRITY

Conflicts of Interest

- Act with integrity and transparency, notifying us about relationships, investments, jobs, or any other matter that might amount to a conflict of interest.
- Inform us if you become aware of any potential or actual conflict of interest in working for us (for example, if an Imperial Brands' employee has a financial relationship with your company or if one of your employees is related to someone at Imperial Brands).
- Report any other actual or potential conflicts of interest as soon as they are known.

Confidentiality and Privacy

- Protect personal information and implement appropriate security measures to ensure the privacy of our employees, customers and suppliers in accordance with the EU General Data Protection Regulation and other applicable data privacy laws and regulations.
- Safeguard Imperial Brands' confidential information, sharing it only with those who need to see it and are authorised to see it.
- Inform us immediately of a suspected or actual data breach, or if our information is released to any third party without our prior authorisation.
- Maintain and honour any non-disclosure or confidentiality agreements with us to protect confidential information.
- Complete a data processing agreement if processing the personal information of our employees, customers or suppliers.

Responsible Marketing

- Only advertise or market our combustible tobacco or next generation products (NGP) to adult smokers or adult recreational consumers of nicotine products. Adults are consumers above the age of 18 or a higher local minimum age for consumption of these products.
- Apply Imperial Brands Marketing Standards to consumer advertising/promotional materials and activities you create for our brands. Our marketing standards take precedence except where local law demands a higher standard.

Illicit Trade

- Do not engage in or support illicit trade in any form and cooperate with authorities to help prevent illegal products from finding their way into the legitimate market.
- Report to us any suspicions related to the illicit trade of our products, including the use of our branded material.

> **Inform us immediately of a suspected or actual data breach, or if our information is released to any third party without authorisation**

BUSINESS INTEGRITY

Fair Competition and Anti-trust

- Understand and comply with applicable anti-trust and competition laws in the markets in which you operate.
- Only work with our competitors where to do so would not create any conflict of interest and where appropriate steps are taken to protect Imperial Brands' confidential information and to respect competition law.
- Do not discuss commercially sensitive topics with our competitors, such as our input costs, pricing, terms of trade or new product launches.
- Do not act as an intermediary between us and our competitors, including not sharing with us our competitors' trade secrets or other confidential information.

Sanctions and Export Controls

- Understand the export controls and trade restrictions that are relevant to your business.
- Comply with all applicable sanctions laws and export controls in any work undertaken for Imperial Brands.

Speaking Up

Raise your concern confidentially using our online Speaking Up service. Our Speaking Up Policy offers further guidance for reporting concerns and information on our non-retaliation policy.

Speaking Up

> **Understand and comply with applicable anti-trust and competition laws in the markets in which you operate**

HUMAN RIGHTS

We value the safety, dignity and well-being of our employees, our business partners, and the communities in which we do business.

We respect human rights throughout our operations and are committed to the avoidance of any form of child labour, forced or bonded labour as well as protecting freedom of association. We are guided by the Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights, and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. For more information, see Imperial Brands Human Rights Policy. We expect our suppliers to share our commitment to human rights and work with us in ensuring fair and safe workplaces and communities.

As an Imperial Brands supplier, we expect you to adhere to the following standards, but in all cases you must meet local law as a minimum standard:

Child labour

- Must not employ any child under the age of 13 and must not employ any person younger than the minimum local legal working age.
- Light work may be permitted within the hours determined by local legislation provided this does not interfere with schooling, health or personal development.
- Must not employ any person under the age of 18 in hazardous work (as defined by local legislation).
- Protect children from slavery, trafficking and sexual exploitation.

Modern slavery, forced labour and human trafficking

- Employ workers voluntarily, based on terms and conditions known and understood at the time of recruitment. A written contract should be provided where requested or required by local laws.
- Do not employ any worker on the basis of recruitment fees, employment fees, or debt bondage of any kind.
- Allow all workers to retain ownership of their personal documents, including identification cards and passports.
- Respect freedom of movement.

> **We value the safety, dignity and well-being of our employees, our business partners, and the communities in which we do business**

HUMAN RIGHTS & DEI

Working hours, Wages and Benefits

- Ensure legal and reasonable working hours and wages that are consistent with national or local laws, industry standards, or collective agreements which have been reached with workers, whichever offers greater protection.
- Pay wages on time and in full, ensuring that any wage deductions are legal, justified, transparent and recorded.
- Provide workers with all leave required by local laws and regulations, including breaks, sick days, rest days and holidays.
- Ensure that additional work or overtime work is voluntary, legal, and compensated in line with applicable laws.

Fair Treatment, Diversity, Equity & Inclusion

- Work to provide a workplace that is free from any form of violence, coercion, intimidation, harassment, sexual harassment, discrimination or any other demeaning behaviour.
- Treat all employees with dignity, respect and fairness.
- Promote diversity, equity and inclusion in employment, promotion, and management representation.
- Work toward procurement practices that support a diverse set of suppliers, where possible.

Continually Improving: Diversity, Equity & Inclusion

- Working toward a more diverse and inclusive workplace is our shared responsibility. We're working hard toward our aim of achieving a more diverse and inclusive organisation at Imperial Brands, and as part of those efforts, would like to see our suppliers do their part.
- We encourage Imperial Brands suppliers to set up internal programmes to proactively measure, monitor and promote diversity, equity and inclusion in their organisations.
- Learn more about what we are doing to promote diversity, equity and inclusion on our website here.

Freedom of Association

- Respect the right of workers to join or form trade unions or works councils of their choosing and bargain collectively without fear of intimidation or retaliation.

"We're working hard toward our aim of achieving a more diverse and inclusive organisation at Imperial Brands, and as part of those efforts, would like to see our suppliers do their part"

HUMAN RIGHTS & DEI

Grievance Mechanisms and Remedies

- Where possible, provide workers with a confidential internal mechanism to lodge complaints and grievances, without fear of retaliation or reprisal. Aim to establish an effective system and internal processes to investigate and address concerns in a transparent, fair and swift manner.
- Where this is not possible, encourage workers to report concerns to Imperial Brands directly, either to SpeakUp@impbrands.com or using our confidential Speaking Up service.

Health and Safety

- Comply with all applicable health and safety laws and regulations, legislation and standards.
- Provide workers with all necessary health and safety training, equipment and workwear.
- Hazardous tasks should not be performed by people that are not trained to perform the task, by anyone under 18 years of age, by pregnant women, breastfeeding mothers or by elderly people.
- Minimise worker, third party and community exposure to hazardous materials and substances.
- Ensure any accommodation, transportation or any other communal facilities provided to workers are safe, clean and suitable.
- Immediately report any health and safety concerns relevant to your relationship with us to your Imperial Brands procurement contact, or confidentially using our online Speaking Up service.

Continually Improving: Safer workplaces

- We expect Imperial Brands suppliers to join us in continually working toward safer workplaces and communities. In addition to these minimum requirements, we encourage you to obtain all relevant health and safety certifications applicable to your business, and work to identify health and safety risks and hazards through regular monitoring and audits of facilities, equipment, and processes.
- Talk to us if you feel any aspect of our work could be made safer.
- Refer to our Health, Safety and Wellbeing policy on our website to learn more about our commitment to achieve world class Health, Safety and Wellbeing standards.

Hazardous tasks should not be performed by people that are not trained to perform the task, by anyone under 18 years of age, by pregnant women, breastfeeding mothers or by elderly people

ENVIRONMENTAL SUSTAINABILITY

We are committed to seeking environmentally sustainable ways of working – it's the right thing to do for our people, our business, and our planet.

In our operations, we are aiming for:

- Net zero emissions by 2040
- Zero waste to landfill by 2025
- Zero deforestation by 2025

You can read more about our environmental commitments and goals in Imperial Brands ESG Strategy.

We ask that you join us on our journey to reduce the environmental impact of our business by managing your own environmental impacts responsibly. As an Imperial Brands supplier, you must meet the following standards as a minimum:

- Comply with all environmental laws and regulations applicable to your business.
- Take remedial action as required, report to the relevant authorities if required, and notify us about any incidents involving our business that have or could have adverse environmental impacts.
- Notify us of any processes or conditions related to our business that could harm or otherwise adversely affect the environment.

ENVIRONMENTAL SUSTAINABILITY

Continually Improving: Environmental Sustainability

We encourage you to go beyond our minimum standards and adopt initiatives that can help to advance our environmental goals and protect our planet in the following areas:

Emissions

- Reduce scope 1, 2 and 3 emissions in your business operations.

Waste

- Mitigate the impact of waste generated by your business operations.
- Design products mindful of opportunities to reduce waste.
- Increase recyclability and reusability of packaging.
- Actively work to reduce waste to landfill and ensure safe and efficient disposal or processing of waste.

Sustainable Ingredients, Materials and Methods

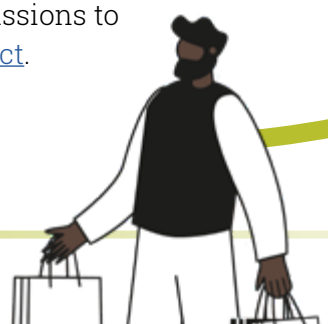
- Reduce reliance on virgin and finite materials except where required.
- Monitor and optimise the consumption of natural resources.
- Replace toxic and harmful agrochemicals with natural and non-hazardous alternatives, where feasible.
- Work with your suppliers to ensure natural resources are used responsibly.

Deforestation and Biodiversity

- Seek to minimise deforestation impacts in your operations.
- Explore measures for the preservation and enhancement of biodiversity, including preventing loss of habitats and protection of endangered or threatened species.
- Ensure compliance with applicable deforestation due diligence laws for deforestation risk products, and establish processes to perform due diligence and address risks or issues in your supply chain, in anticipation of new due diligence laws

Policy, monitoring and Reporting

- Establish an environmental policy and management system.
- Identify key performance indicators to measure, monitor and continually improve environmental performance in line with target setting initiatives, such as the Science Based Targets initiative.
- Participate in annual submissions to the Carbon Disclosure Project.



VERIFICATION AND CONTINUOUS IMPROVEMENT

We expect our suppliers to implement the standards outlined in the Code. This includes putting in place the necessary processes and controls and reporting measurable progress.

As part of our continuous improvement approach to the implementation of our standards, we will, in individual cases, work with you to improve practices and address challenges. We will not accept or ignore activities which we suspect may breach the Code.

As an Imperial Brands supplier, you are expected to:

- Co-operate with any internal or external review, assessment or audit requested of your business which is relevant to compliance with the Code.
- Co-operate with us to agree and implement in a timely manner actions to mitigate or correct gaps or problems, should they be found.

Suppliers must understand that performance against the standards set out in the Code, and a supplier's willingness to promptly rectify any deficiencies, will be significant factors in our decision to engage in, or to continue, a business relationship with an Imperial Brands supplier. In certain cases, non-conformance with the Code will be subject to requirement for corrective action, and may include the termination of contractual agreements.

SPEAKING UP

We encourage openness and transparency within Imperial Brands and with our suppliers. If you have a concern or suspect that a breach of the law, or the Supplier Code of Conduct, has taken place, we want you to speak up.

Contact us at:

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Speaking Up

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Speaking Up

Further Information and Resources

See Imperial Brands website at www.imperialbrandsplc.com