



# MODERN SLAVERY STATEMENT 2025



**IMPERIAL  
BRANDS**

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For more information on our ESG strategy and detailed approach to human rights, please visit:

[www.imperialbrandsplc.com/healthier-futures/our-esg-strategy](http://www.imperialbrandsplc.com/healthier-futures/our-esg-strategy)



This statement satisfies the requirements for those companies [in the Imperial Brands Group] which are in scope of Part 6, section 54 of the Modern Slavery Act 2015. This statement also sets out the steps taken by Imperial Brands PLC and its subsidiaries during the financial year ending 30 September 2025 to understand potential modern slavery risks related to our business and supply chains and describes measures taken to address these risks.

This document constitutes the tenth annual statement issued by the Company. Previous statements are publicly available on our corporate website. This statement will also be submitted to the [UK Government's Modern Slavery Statement Registry](#).

# MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

As a global business, we are committed to respecting and supporting human rights across our operations, supply chain, and the communities in which we operate. We aim to mitigate risks of human rights abuses and conduct our business in a responsible and sustainable manner.

In line with the UK Government's modern slavery strategy<sup>1</sup>, we recognise that modern slavery includes slavery, servitude, forced or compulsory labour, and human trafficking. We understand the potential exposure to these risks and address them through engagement with employees, suppliers, business partners, customers, and NGOs.

Our commitment is embedded in several Group policies, including the Code of Conduct, Supplier Code of Conduct, and policies on Human Rights, Speaking Up, and Health, Safety and Wellbeing. These set the foundation for expected conduct across our operations and partnerships.

Human rights, including modern slavery, is one of our eight environmental, social and governance (ESG) priorities. Oversight is provided by the People, Governance and Sustainability (PGS) Committee, chaired by the Chair of Imperial Brands, with input from the Group ESG Committee.

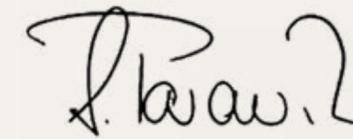
Our [ESG strategy](#), aligned with the United Nations (UN) Sustainable Development Goals (SDGs), outlines clear objectives for each priority area. Performance against this strategy is reported in the Annual Report and Accounts, our [corporate website](#), and our [ESG Performance Summary](#).

In 2025, Imperial Brands advanced its modern slavery and human rights commitments through targeted audits, supplier engagement, and awareness initiatives. The company conducted five in-person and three online human rights audits across key markets and manufacturing sites.

Visible and permanent designated spaces were introduced in selected workplaces to make key human rights messages easily accessible, especially for offline and non-English-speaking employees. These spaces display essential information and guide employees to further resources. All leaf suppliers from whom we purchased tobacco participated in the Sustainable Tobacco Programme (STP), with additional in-country verifications and independent assessments conducted to validate supplier practices and support action planning. The Leaf Partnership Programme supported beneficiaries across multiple regions, contributing to efforts to address the root causes of human rights risks. Ethical sourcing was further strengthened through expanded Sedex (Supplier Ethical Data Exchange) and SMETA (Sedex Members Ethical Trade Audit) audit coverage, integration into procurement decisions, and full compliance with conflict minerals reporting requirements. Following the identification of a child labour case during an EPS operation in Côte d'Ivoire, a thorough investigation was conducted, and a comprehensive action plan aligned with the Group's human rights and modern slavery standards was implemented during FY25.

Looking ahead to 2026, Imperial Brands will continue to strengthen its human rights and modern slavery efforts through targeted actions. The company plans to report on risks identified through internal assessments, the STP, and third-party impact assessments. It will expand the deployment of "Human Rights Corners" in key markets and offices, integrate Slave-Free Alliance's Site Assessment Methodology into human rights audit processes, and conduct six audits, including three in-person and three online, to reinforce the implementation of Human Rights Leading Indicators (HRLI). Additional priorities include refreshing the Global Procurement Policy, expanding Sedex coverage across indirect spend categories, and addressing critical SMETA audit findings with suppliers.

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015, covering the financial year 1 October 2024 – 30 September 2025. It was approved by the Board on 28 January 2026 and signed by:



**Lukas Paravicini**  
Chief Executive Officer  
Imperial Brands PLC



1. <https://www.gov.uk/government/publications/modern-slavery-strategy>

# OUR BUSINESS AND SUPPLY CHAINS

## OUR BUSINESS

Our refreshed strategy is shaping a more consumer-centric, focused, and agile enterprise, aimed at delivering consistent and sustainable growth. Building on strong foundations, we are deepening our engagement with consumers and evolving into a simpler, data-led organisation that empowers our people to perform at their best every day.

Our ESG commitments are integral to our business strategy and are aligned with the Company's purpose and vision. The ESG strategy, which covers key priorities such as modern slavery, is one of the factors that informs commercial decision-making and is supported by a strong governance framework that promotes transparency, ethical conduct, and high corporate standards.

We remain committed to continuously reviewing and enhancing our risk management and disclosure practices to ensure alignment with evolving standards and global best practices.

### Where We Operate

Our Americas region is primarily focused on the USA.

In Europe, our largest markets include Germany, Spain, and the UK, where we offer a broad range of tobacco and next generation products.

The AAACE region spans diverse markets such as Australia, Poland, Morocco, Saudi Arabia, and Taiwan.

### Distribution

Logista is a publicly listed company on the Bolsa de Madrid Stock Exchange and operates with commercial independence due to commercial sensitivities. It is responsible for managing its own ESG-related data and, as such, is outside the scope of Imperial's ESG-related KPIs. Logista has developed a three-year ESG strategic plan (2024–2026), outlining specific objectives and actions, which is available on its corporate website. [www.grupologista.com](http://www.grupologista.com)

## OUR SUPPLY CHAINS

Suppliers are critical partners to our operations, and we expect them to uphold ethical standards, comply with laws, respect human rights, and promote sustainability and inclusion. These expectations are outlined in our Supplier Code of Conduct, updated in 2023 and available in 32 languages. Adherence to our Code or an equivalent is required in tenders and contracts. We engage regularly with centrally managed suppliers and consider corrective action where standards are not met.

We have two distinct supply chains consisting of tobacco leaf supply and Non-Tobacco Materials (NTM) supply, which includes NGP, indirect goods and services, and logistics.

Our Global Procurement team oversees strategic suppliers, while local teams manage smaller suppliers. We continue to consolidate our supplier base to improve transparency and efficiency.

We procure both direct and indirect materials essential to our operations. Direct materials include paper, filters, glue, and components for NGP, which are integrated into our final products. Indirect goods and services, including IT systems, professional services, utilities, and logistics, support our broader operational needs.

### Tobacco Leaf Supply

In financial year (FY) 2025, we sourced over 116,000 tonnes of tobacco leaf from 30 countries, primarily through large international merchants, with approximately 97% of purchases by volume made through global and niche suppliers, and around 3% from directly contracted farms. Our sourcing footprint spans Africa, the Americas, Asia, and Europe, with Brazil, India, China and Tanzania among our largest sourcing countries.

We are committed to working with socially and environmentally responsible suppliers and promoting good agricultural practices. In line with this commitment, 100% of suppliers from whom we purchased tobacco reported on their due diligence and actions through the Sustainable Tobacco Programme (STP) for the 2024 crop year.

### Non-Tobacco Materials Supply (NTM)

In 2025, we had 192 direct material suppliers, 66 of which are managed centrally by our Global Procurement team and 126 managed by our Local Procurement teams. Of our direct material supplier base, approximately 85% of our main spend is with 23 suppliers.

### What We Do



#### Tobacco products

Our core business is the manufacture and sale of a portfolio of tobacco products and smoking accessories that are available in around 120 markets worldwide.



#### Next generation products (NGP)

In line with our purpose to forge a healthier future for moments of relaxation and pleasure, we are developing a range of smoke-free products that offer adult smokers potentially less harmful alternatives.

## OUR BUSINESS AND WORKFORCE IN 2025

25,000  
employees  
worldwide

27  
manufacturing  
sites

£8.3 bn  
generated in  
tobacco and NGP  
net revenue

£2.8 bn  
in capital returned  
to shareholders

160  
brands in  
our portfolio

c.120  
markets we  
operate in

# GOVERNANCE AND POLICIES

## GOVERNANCE

Imperial Brands has established a robust ESG governance framework to ensure effective oversight of human rights and modern slavery risks across its operations and supply chain.

### ESG Governance Structure

Oversight of ESG matters is the responsibility of the Board's People, Governance and Sustainability (PGS) Committee, chaired by the Chair of Imperial Brands. This Committee plays a central role in monitoring the management and mitigation of key ESG risks, including those related to modern slavery and human rights. It ensures that the Group's ESG strategy is effectively implemented and that appropriate resources are allocated to deliver on its commitments.

The PGS Committee received information from two executive-level bodies, both chaired by the Chief Executive Officer, during the period:

- The Group ESG Committee, which oversees the Company's ESG Agenda, tracks progress against ESG commitments and ensures alignment with the Group's strategic objectives.
- The Group Ethics & Compliance (GEC) Committee, which provided oversight of the Group's ethics and compliance activities, supported risk mitigation and investigation oversight, and reviewed the Group Code of Conduct.
- Since 29 April 2025, the Group ESG Committee and GEC Committee have been combined, retaining the Group ESG Committee name. This change reflects our ongoing commitment to develop and improve our approach to governance.

### Human Rights Compliance Working Group

To strengthen human rights due diligence, we established a Human Rights Compliance Working Group, endorsed by the Group ESG Committee, to support our human rights framework. Our human rights risk appetite statement is reviewed annually by the Risk Committee and the Board.



## POLICIES

Imperial Brands has a robust set of policies supporting its commitment to human rights and the prevention of modern slavery.

These include our [Group Code of Conduct](#), updated in 2024, which sets expectations for ethical behaviour and is aligned with our ESG strategy; our [Supplier Code of Conduct](#), embedded in procurement processes and updated in 2023; our [Human Rights Policy](#), aligned with international standards<sup>2</sup> and revised to reflect key risks, including modern slavery; and our [Speaking Up Policy](#), which provides a confidential mechanism for reporting concerns, available in 39 languages.

### Other Relevant Policies

Imperial Brands' commitment to ethical and responsible business conduct is further supported by a range of related policies, including:

- [Anti-Bribery and Corruption Policy](#)
- [Anti-Fraud Policy](#)
- [Employment Policy](#)
- [Fairness at Work Policy](#)
- [Group Environment Policy](#)
- [Group Health, Safety and Wellbeing Policy](#)
- [Global Procurement Policy](#)

These policies are embedded into operational and procurement processes and are regularly reviewed to ensure alignment with evolving legal and ethical standards.



# RISK ASSESSMENT AND DUE DILIGENCE

Imperial Brands applies a risk-based approach to identifying, assessing, and mitigating human rights risks, including modern slavery, across its global operations and supply chain.

## Leaf, NTM and NGP Supplier Qualification Process

All new suppliers for Leaf, NTM (Non-Tobacco Materials) and NGP (Next Generation Products) must undergo a Supplier Qualification Programme, starting with a self-assessment covering:

- Business conduct
- Environmental management
- Labour practices (e.g. discrimination, child/forced labour, freedom of association, remuneration, working hours, health & safety)

As our NGP business expands, we recognise the increasing relevance of responsible mineral sourcing. All NGP suppliers are required to complete the Conflict Minerals Reporting Template (CMRT), and 100% of our battery suppliers have submitted the Extended Minerals Reporting Template (EMRT). These tools support our ability to assess sourcing risks related to mineral origin and upstream supplier practices, while ensuring alignment with evolving regulatory requirements.

Once qualified, the Global Quality team conducts further reviews, which include:

- Evidence of ESG management
- Communication of the supplier's Code of Conduct and grievance policies
- Audit practices and follow-up actions

## Services and Goods Supply Oversight

Logistics and indirect suppliers (e.g. facilities management, IT systems, professional services and suppliers who support our broader operational needs) do not go through the Supplier Qualification Programme. Instead, during tender processes, suppliers are asked to provide relevant policies, especially those addressing:

- Labour practices
- Forced and child labour (particularly for outsourced services or goods manufacturing)

These policies are reviewed during supplier selection.

For larger service engagements – such as new outsourcing arrangements, geographic shifts, or goods manufacturing for Imperial – a site visit is typically conducted. However, regular audits are not performed. Any site visits are ad-hoc, based on identified ESG risks and assessed on a case-by-case basis.

## Use of Sedex and SMETA Audits

To strengthen supply chain transparency and ethical compliance, Imperial Brands utilises the Sedex platform to conduct supplier risk assessments, covering key areas such as Human Rights, Labour Standards and Health and Safety. A risk-based approach is then applied to determine when a Sedex Members Ethical Trade Audit (SMETA) is required. SMETA audits are performed on-site by externally certified auditors. The outcomes of these assessments inform supplier improvement plans.

In 2025, we expanded the use of third-party risk assessments through our partnership with Sedex. Participation in Sedex is a key requirement within our SRM Connect Programme, enabling the integration of social, ethical, and environmental assessments into supplier management. This year, our primary focus has been expanding Sedex assessments across our NGP business.

## Sustainable Tobacco Programme (STP)

The STP<sup>3</sup> is our primary due diligence mechanism for the tobacco leaf supply chain. As an independent industry initiative, it provides insights into supplier practices across eight ESG themes, including human and labour rights. The programme also includes a dedicated human rights module and references guidance on modern slavery.

In 2025, all leaf suppliers from whom we purchased tobacco completed annual self-assessments for the relevant crop year (2024) through STP. The STP has an established methodology for Supply Chain Impact Assessments (SCIAs), which third-party experts in the field conduct. We participated in five third-party SCIAs focused on human and labour rights risks, helping suppliers develop targeted action plans to address identified issues.

## Leaf Sustainability Verification

As a supplement to STP insights, we conduct in-house, risk-based verification with key suppliers through our Leaf In-Country Verification methodology. In 2025, we carried out assessments in four origin countries to validate supplier-reported data and improve understanding of their risk management practices. We also completed our annual methodology review to enhance effectiveness.

## Human Rights Leading Indicators (HRLI)

In 2024, Imperial Brands transitioned its Modern Slavery Leading Indicators to Human Rights Leading Indicators (HRLI), enhancing clarity and practical guidance for assessing sites on policies, contracts, training, recruitment, and grievance mechanisms. In 2025, we expanded HRLI reporting to include offices and markets, resetting our baseline to reflect this broader scope. Pilot reporting began in West Africa, South East Europe, and Australasia, supported by compliance assessments in Greece and Italy. Recognising the complexity of HRLI, we strengthened support for local human rights champions through targeted training and resources. We also monitored emerging legislation, including European sustainability directives, to ensure readiness and minimise disruption.



# RISK ASSESSMENT AND DUE DILIGENCE

## SUMMARY OF AUDIT ACTIVITIES – 2025

Audit locations are selected using international risk data and local insights to identify concerns and understand local contexts. No modern slavery cases were found, but areas for improvement were noted, including supplier engagement and monitoring of shared addresses and bank accounts. Our operations undergo regular, risk-based audits covering labour practices, health and safety, and policy awareness. The Group Internal Audit (GIA) team continues to apply and refine the Human Rights Internal Audit Module to align with evolving standards.

Site & Location	Function	Conducted by	Type	Key Findings
Philippines Bobbin Corporation (PBC) – Rosario, the Philippines	Global Supply Chain (GSC)	ESG team	In-person	<ul style="list-style-type: none"> <li>• No suspected modern slavery</li> <li>• Strong compliance</li> <li>• Improvement areas identified</li> </ul>
Greece and Italy Markets – Athens, Greece	South East Europe Cluster	ESG & GIA teams	In-person	<ul style="list-style-type: none"> <li>• No suspected modern slavery</li> <li>• Solid engagement</li> <li>• Improvement areas identified</li> </ul>
Reemtsma’s main office and lab – Hamburg, Germany	DACH Cluster	ESG team	In-person	<ul style="list-style-type: none"> <li>• No suspected modern slavery</li> <li>• Strong compliance</li> <li>• Best practices</li> </ul>
Fontem Ventures – Amsterdam, the Netherlands	Global Hub	ESG team	Online	<ul style="list-style-type: none"> <li>• No suspected modern slavery</li> <li>• Improvement areas identified</li> </ul>
Liverpool Innovation Centre – UK	Research & Development – Innovation	ESG team	Online	<ul style="list-style-type: none"> <li>• No suspected modern slavery</li> <li>• Improvement areas identified</li> </ul>
Dubai Office – UAE	AMET Cluster / AAACE	ESG team	Online	<ul style="list-style-type: none"> <li>• No suspected modern slavery</li> <li>• Strong compliance</li> <li>• Best practices</li> </ul>
Jhunan Factory – Taiwan	GSC	GIA	In-person	<ul style="list-style-type: none"> <li>• No observations raised</li> </ul>
Bobo-Dioulasso Factory – Burkina Faso	GSC	GIA	In-person	<ul style="list-style-type: none"> <li>• No observations raised</li> </ul>
Leaf Supply Chain	GSC	Leaf team	In-person	<ul style="list-style-type: none"> <li>• Supplier due diligence systems verified</li> <li>• No high-priority findings identified related to human and labour rights</li> </ul>

# PROCESSES FOR REPORTING, REMEDIATION, AND MANAGING ALLEGATIONS

We are committed to investigating potential human rights issues identified within our supply chain and direct operations. We take any allegations relating to human rights, including modern slavery, extremely seriously. We pursue multi-stakeholder initiatives and engage both internally and with any relevant external stakeholders, which may include suppliers and NGOs, to investigate allegations and respond to any issues identified effectively.

## Speaking Up

We are committed to maintaining a safe, respectful, and ethical workplace. Our Speaking Up process is a vital channel for reporting concerns about modern slavery, human rights abuses, or any other misconduct.

### There are several ways to raise a concern:

- Speak directly with a People Leader or local People & Culture (P&C) business partner.
- Contact Group Legal: [speakup@impbrands.com](mailto:speakup@impbrands.com)
- Use our secure, confidential Speaking Up platform, accessible via PC or mobile. You can scan the QR code or visit: <https://imperialbrands.whistleblownetwork.net>. Reports can be made anonymously, and in some countries, a local toll-free number is also available.



Our reporting channel is open to all employees, suppliers, partners, and communities. All reports are treated seriously, with confidentiality protected and zero tolerance for retaliation. Updates on the Speaking Up process and incidents are shared with the Board PGS Committee.

## The Importance of Asking for Help and Speaking Up

By encouraging open dialogue and raising concerns, we can reduce risks, resolve issues early, and create a safer, more respectful workplace for everyone.

To support this, we established a Modern Slavery Working Group to ensure concerns are escalated effectively and addressed promptly.

In 2023, as part of our commitments and in partnership with Slave-Free Alliance (of which Imperial Brands is a founding member), we developed a Modern Slavery Toolkit. This resource helps colleagues:

- Understand what modern slavery is
  - Recognise key indicators and warning signs
  - Respond appropriately to potential victims
  - Escalate and report concerns confidently
- Building on this, in 2024, we introduced a standardised local escalation process aligned with our Speaking Up Policy. This process:
- Clarifies the steps to take when modern slavery or labour exploitation is suspected
  - Supports consistent responses across our operations
  - Is available in 39 languages to ensure accessibility

We also shared this process with a group of local champions to help embed it across the organisation and strengthen our collective response.

## Summary of Reports Received and Actions Taken

In FY25, Imperial Brands received eleven reports of potential human rights-related wrongdoing, submitted either through the global Speak Up platform or via local reporting mechanisms. Following the investigations, seven cases were determined to be unfounded, one case was partially substantiated, and two were substantiated. One case remains open at the time of writing. In the cases where the facts were substantiated, the investigations concluded that the incidents did not constitute forced labour.

### External Allegations – Malawi

In December 2020, a claim was filed in the High Court of England and Wales against Imperial Brands PLC, Imperial Tobacco Limited and four of its subsidiaries by a group of tobacco farm workers, which included allegations relating to child and forced labour. Imperial is defending the claim. As this is an ongoing litigation, we are unable to comment further.



Further information can be found in our [Speaking Up Policy](#).

For further information on how we are addressing ESG-related topics please visit our [website](#).



# TRAINING AND AWARENESS

We continue to deliver training and communication initiatives to raise awareness of human rights risks, including modern slavery, across our organisation. These efforts strengthen our ability to identify and respond to issues, supporting responsible business conduct and continuous improvement in due diligence.

Our modern slavery e-learning course helps employees understand the issue and how to report concerns. It is available in 14 languages to support global accessibility.

## Human Rights Training and Awareness

In 2023, we launched a global ESG learning module to raise awareness of human rights and modern slavery. Tailored for key business areas, it became mandatory in 2024 for English-speaking employees and managers. By FY25, over 4,980 employees completed the training. We plan to expand its reach to further embed awareness and accountability across the organisation.

## Targeted Training for High-Risk Functions

In 2025, we adopted a targeted training approach for teams with higher exposure to human rights risks, including Global Engineering, Security Operations, and Procurement. A modern slavery workshop using a real-world case study was delivered to facilities management teams. Additional sessions were held for Group Science, Global Duty Free, Global Supply Chain, and sites reporting under our Human Rights Leading Indicators framework.

## Human Rights Corners

In FY25, we introduced “Human Rights Corners” to make key messages accessible to all employees, especially offline and non-English-speaking teams. Developed with Communications and Learning & Development, these visual spaces ensure consistent yet locally relevant messaging, starting with high-priority sites identified through risk mapping.

During the 2025 crop seasons, in-person training was delivered across our Leaf direct operations in Madagascar and Laos. In Madagascar, 100% of directly contracted farmers and 94% of seasonal workers on our commercial farms completed the training, representing an increase from 92% in 2024. In Laos, the entire grower base received human and labour rights training, compared to 98% in 2024.



# CASE STUDIES



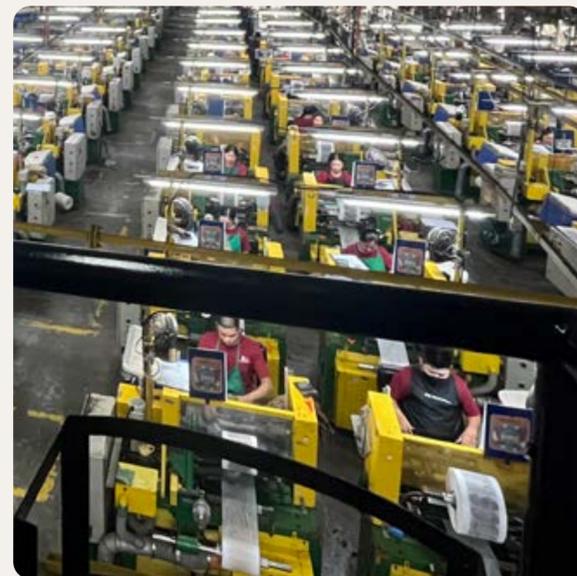
## CASE STUDY: From Audit to Accreditation: Advancing Human Rights at Cantabria

In 2023, a human rights audit at our Cantabria factory showed strong performance against our modern slavery indicators. Building on this achievement, the site pursued SA8000 certification, becoming the first within Imperial Brands to do so and demonstrating its commitment to high social standards. The process involved aligning practices with SA8000 criteria, supported by collaboration between local and global teams. Following a successful third-party audit in FY25, the certification was achieved, setting a benchmark for social accountability across our operations.



## CASE STUDY: Pilot of Slave-Free Alliance's Site Assessment Methodology at PBC

In 2025, we piloted Slave-Free Alliance Site Assessment Methodology at our PBC factory in the Philippines, integrating it with our HRLI audit. This comprehensive approach assessed modern slavery risks using international standards such as SA8000, ETI Base Code, ILO indicators, and UNGPs. The assessment included site observations, employee interviews, and management reviews, offering deeper insights into working conditions and reinforcing our commitment to practical, context-relevant human rights due diligence.



## LESSONS LEARNT: Child Labour Incident and Response in Côte d'Ivoire

In February 2024, a case of child labour was identified during an Empty Pack Survey (EPS) operation carried out by one of our suppliers in Côte d'Ivoire. Immediate actions were taken, including halting operations, initiating a field investigation, and reporting the incident to relevant internal stakeholders. The investigation confirmed the case, prompting the development of a targeted action plan.

A comprehensive action plan was implemented to align with the Group's standards on human rights and modern slavery. Key elements included:

- **Supplier Risk Assessment:** A full mapping and risk categorisation of market suppliers was conducted to identify potential vulnerabilities. This enabled targeted engagement and prioritisation of mitigation efforts.
- **Supplier Engagement and Capacity Building:** Suppliers were required to formally acknowledge their commitment to modern slavery standards. Awareness-raising and training initiatives were rolled out across the supply chain and internal teams to strengthen understanding and compliance.
- **Operational Oversight and Controls:** Enhanced monitoring mechanisms were introduced, including random audits and verification procedures during field operations.
- **Third-Party Management:** Alternative operational models were evaluated to reduce risk exposure in specific activities. The selected approach includes structured partnerships with vetted service providers, reinforced by training, fair remuneration, provision of protective equipment, and supervisory checks.

These actions reflect the Group's commitment to continuous improvement in human rights due diligence and responsible business conduct across its operations and supply chain.



# STAKEHOLDER ENGAGEMENT

## Engagement on Child Labour Risks

As with other agricultural industries, the risk of child labour is highest in the cultivation part of our supply chain. In addition to working directly with our suppliers, we recognise that child labour is a multi-stakeholder issue, which no single entity can address in isolation.

In collaboration with key stakeholders, including the industry and suppliers operating in these communities, we seek to address the risk of child labour through three main activities:

1



Sustainable Tobacco Program

### STP

The Human and Labour Rights section of the STP is aligned with relevant ILO core conventions and consistent with principles and guidance from external frameworks, including the UN Guiding Principles on Business and Human Rights (UNGPs).

2



### Our Leaf Partnership Projects

We work directly with our leaf suppliers to fund projects in tobacco-growing communities to help tackle some of the root causes of child labour.

3



### The Eliminating Child Labour in Tobacco Growing Foundation (ECLT)

We are members of the ECLT and support its aims to tackle the root causes of child labour.

## Leaf Partnership Projects

Through our Leaf Partnership Programme, we work with suppliers to support tobacco-growing communities by addressing basic needs such as clean water, education, sanitation, and hygiene. In 2025, our Leaf Partnership Programme has supported over 152,000 community members with projects in our priority countries across Africa, Asia, the Americas and Europe. Out of this total beneficiary population, over 122,000 people have been provided with improved access to clean water, education, sanitation and hygiene.



SLAVE-FREE ALLIANCE  
Working Towards a Slave-free Supply Chain



HOPE FOR JUSTICE

## Awareness Campaigns and Expert Engagement

To mark International Human Rights Day, we hosted a panel discussion with external speakers exploring the evolving human rights risk landscape and the role of business in prevention and remediation. During Anti-Slavery Week in October 2024, we ran an internal awareness campaign, highlighting different modern slavery themes each day and promoting events to build engagement across the business.

We maintain an ongoing collaboration with Hope for Justice and Slave-Free Alliance to strengthen our efforts in preventing and addressing modern slavery risks across our operations and supply chain.



# PROGRESS AGAINST 2025 COMMITMENTS

COMMITMENT	STATUS	COMMENT	Find out more
<p>Perform three in-person and three online human rights audits to evaluate understanding and reinforce the implementation of our human rights leading indicators.</p>	<p>Completed</p> 	<p>We committed to conducting three in-person human rights audits, and we completed five. We audited the Greek and Italian Markets, our main office and the lab in Hamburg, and the PBC factory in the Philippines. The three planned online audits were conducted in Amsterdam, Liverpool and Dubai.</p>	<p>See page 7</p>
<p>Set up “Human Rights Corners” in manufacturing sites and markets to promote awareness of our human rights initiatives in local languages.</p>	<p>Completed</p> 	<p>In FY25, we introduced “Human Rights Corners” to improve access to key messages for offline and non-English-speaking employees. Developed with internal teams, these visual spaces support consistent, locally adapted communication in high-risk locations, reinforcing everyday human rights practices.</p>	<p>See page 9</p>
<p>Report on key actions being taken to prevent and address any human rights-related issues arising within our supply chain, whether this information comes through from our own assessments, the industry-wide Sustainable Tobacco Programme or from independently commissioned Impact Assessments being conducted within tobacco growing communities.</p>	<p>Completed</p> 	<p>All leaf suppliers from whom we purchased tobacco participated in the STP. Imperial Brands addressed all reported human and labour rights incidents for the relevant crop year, applying the ‘Leaf In-Country Verification’ methodology and conducting an annual review to strengthen the approach. In 2025, five third-party in-country assessments on human and labour rights were carried out by subject-matter experts in collaboration with STP, and suppliers developed action plans to address prioritised findings. Through our Leaf Partnership Programme, we supported over 152,000 community members in priority countries.</p>	<p>See pages 6 &amp; 11</p>
<p>Aim to enhance and broaden our risk-based assessment approach by expanding the use of Sedex and SMETA audits into more areas of our supply chain, enabling a more comprehensive evaluation of our supplier’s and their ethical practices. This expansion will strengthen our commitment to responsible sourcing and improve visibility across all levels of our supply chain.</p>	<p>Completed</p> 	<p>In 2025, we expanded Sedex and SMETA audits to high-risk and NGP tier 2 suppliers, integrating results into procurement decisions and embedding participation in SRM Connect. We also strengthened our Conflict Minerals approach by requiring all NGP suppliers to complete the reporting template and achieved 100% extended template completion from battery suppliers.</p>	<p>See page 6</p>
<p>Collaborate with the Global Human Rights Manager on an audit within FY25 to help continue to improve GIA’s understanding and capability in this area, as well as enhance the existing audit module content where necessary. Apply the audit module on selected audits (taking a risk-based approach), as part of Imperial Brands’ audit plan.</p>	<p>Completed</p> 	<p>The GIA team collaborated with the Global Human Rights Manager on a pilot market audit covering both Greece and Italy. Following this, feedback was shared to ensure a more aligned audit approach going forward. Training was provided to the wider GIA team following this.</p> <p>The audit module was applied on audits for: Jhunan Factory (Taiwan)) and Bobo-Dioulasso Factory (Burkina Faso).</p>	<p>See page 7</p>

# LOOKING AHEAD: 2026 PRIORITIES

## Leaf Operations:

- Reporting on key actions taken to identify, assess and respond to prioritised human rights-related risks across our leaf supply chain remains a priority. Such risks may be identified through the Sustainable Tobacco Programme, independent third-party impact assessments, or through our own ongoing supplier engagement.



## Procurement:

- Refresh our Global Procurement Policy to further strengthen our risk-based approach and inclusion of third-party risk assessments in procurement decisions.
- Increase Sedex coverage across indirect spend categories.
- Work with suppliers to resolve business-critical and critical SMETA audit findings.



## Human Rights:

- Progressively deploy “Human Rights Corners” in key markets and offices to promote local engagement and increase visibility of human rights initiatives.
- Integrate Slave-Free Alliance’s Site Assessment Methodology into existing human rights audit processes to enable more robust and context-sensitive evaluations.
- Perform three in-person and three online human rights audits to evaluate understanding and reinforce the implementation of our HRLI.



## Group Internal Audit:

- Continue applying a human rights focus within selected market audits, using a risk-based approach as part of Imperial Brands’ overall audit plan. The goal is to expand this focus to most market audits. In collaboration with the ESG team, incorporate lessons and feedback from the FY25 pilots in Greece and Italy into the HRLI audit approach for FY26.





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