

GROUP HUMAN RIGHTS POLICY



IMPERIAL BRANDS PLC ('IMPERIAL BRANDS') IS COMMITTED TO RESPECTING HUMAN RIGHTS THROUGHOUT OUR OPERATIONS, AND WE EXPECT OUR SUPPLIERS AND BUSINESS PARTNERS TO DO THE SAME.

We commit to conducting our business in a responsible and sustainable way. As stated by the United Nations, human rights are universal and inalienable, indivisible, interdependent and interrelated.

The safety, dignity and well-being of our people is paramount, and we are committed to working with our suppliers and business partners to improve their standards.

This Policy sets out Imperial Brands' approach to the protection of human rights and provides guidance to its employees, suppliers and business partners on their expected conduct.

It is signed and endorsed by our CEO and owned and updated by our Group Environmental, Social and Governance (ESG) team.

For good governance, and to ensure our Board has oversight of ESG issues, including human rights-related matters, we have established a cross-functional ESG Committee chaired by our CEO. On behalf of the Board, the ESG Committee has been tasked with managing material ESG responsibilities, including compliance with this Policy, to ensure the successful delivery of Imperial Brands' ESG strategy.

OBJECTIVES OF THIS POLICY

To respect and support the human rights of our employees, the workers in our supply chain and the communities in which we operate, and to mitigate the potential risk of human rights abuses.

Commitment & Observance of International Human Rights Standards

Our commitment to respect human rights is informed by the International Bill of Human Rights¹, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the ILO's core conventions², as well as the principles contained within the United Nations (UN) Guiding Principles on Business and Human Rights³ and the UN Sustainable Development Goals⁴ (UNSDGs).

¹ The International Bill of Human Rights is comprised of the Universal Declaration on Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights.

² We are also guided by ILO Convention No.138 on Minimum Age for Employment and ILO Recommendation No.190 on the Worst Forms of Child Labour, respectively; ILO Convention No.29 on Forced Labour and No.105 of the Abolition of Forced Labour.

³ The UN Guiding Principles on Business and Human Rights are a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations.

⁴ The UNSDGs are a set of 17 interconnected universal goals intended to create a "blueprint to achieve a better and more sustainable future for all." They are a global call to action for governments, businesses, academia, civil society organisations and individuals alike to realise sustainable development by 2030. The UNSDGs were adopted in September 2015 by the UN General Assembly.

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Industry Collaboration to Promote Human Rights

We recognise that managing risk is a multi-stakeholder issue, which requires engagement with our suppliers and other key stakeholders associated with our business, including the industry, customers, employees and NGOs. In our tobacco leaf supply, we collaborate on an industry-wide tobacco leaf supplier programme, the Sustainable Tobacco Programme (STP), and support the Eliminating Child Labour in Tobacco-Growing Foundation (ECLT).

The STP aims to have a positive human rights impact in tobacco-growing communities and all tobacco leaf suppliers are expected to participate. It is an independently managed framework which works by providing us with visibility over our supply chain in two ways. First, by empowering our suppliers to report on the actions they are taking to address any risks identified. Second, by verifying these actions both remotely and in the field (the latter on a risk-based approach). We use this information to design our response to support our suppliers in taking effective action. We maintain a dialogue with suppliers on their action plan progress and provide support through Leaf Partnerships to enhance long-term projects and initiatives. Through Leaf Partnerships, we work directly with suppliers to fund identified projects on a risk-based approach and support their impact in tobacco-growing communities.

Imperial Brands is a founding member of the Slave-Free Alliance and supports the international charity Hope for Justice in their pursuit of a slave-free world.

SCOPE OF THIS POLICY

This Policy applies to all Imperial Brands companies and any joint venture where Imperial Brands has management control. It applies to all employees, directors and officers of Imperial Brands companies, including temporary and contract staff. Additionally, we expect our suppliers, business and joint venture partners to comply with our Supplier Code of Conduct, which is aligned with this Policy.

RESPONSIBILITIES AND EXPECTATIONS

- We expect our employees, suppliers and business partners to act with integrity, to demonstrate respect for others and to uphold business practices aligned with international human rights standards.
- We provide a fair and safe workplace that is free from violence, coercion, intimidation, harassment, discrimination or other demeaning behaviour.
- We comply with laws concerning fair wages, working hours and holidays.
- We comply with applicable human rights laws, and where local law is less stringent, this Policy takes precedence.
- We ensure that no employee or job applicant receives less favourable treatment on the grounds of gender, colour, race, disability, marital/civil partnership status, nationality, ethnic or national origin, sexual orientation, age or religious beliefs, or any other basis which is not related to their performance or ability to carry out their job.
- We respect the rights of the communities where we operate.

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- We are committed to selecting and doing business with direct suppliers and business partners who can demonstrate that they operate in a manner consistent with our standards and Supplier Code of Conduct. We expect the operations of our suppliers and business partners to respect human rights, including no child or forced labour, and freedom of association. We expect our suppliers and business partners to ensure that people are employed fairly, safely and as a minimum in compliance with international labour standards.
- In our non-tobacco materials supply, we use an approved list for direct and indirect suppliers, which we continue to consolidate where we can. In this way, we establish a relationship of trust and integrity with our suppliers and better enable oversight over our supply chain.
- We operate due diligence and remediation processes which align with our Policy commitments which aim to identify, prevent and mitigate potential human rights abuses.
- We encourage our employees and stakeholders to speak up when human rights abuses are found or suspected. Employees can report concerns to their people managers, the People and Culture team, the Governance team and Group Legal. Employees and stakeholders, including suppliers and farmers, are encouraged to use our Speaking Up service. It is independent and accessible, is available in 77 countries, and supports reporting in 39 different languages.
- We have established processes which regularly monitor and audit our compliance with our human rights obligations using a risk-based approach.
- We provide training on the areas covered by this Policy, to support our employees in their responsibility to promote respect for human rights.
- We report annually⁵ in our Annual Report & Accounts and Modern Slavery Statement respectively on how we manage human rights and modern slavery risks. We make these documents available on our corporate website.

RISKS COVERED BY THIS POLICY

To help manage human rights risk within our direct operations, we conduct Human Rights Impact Assessments throughout our supply chain following a risk-based approach. We consider the following human rights as the risks which are most relevant to our business:

- **FORCED LABOUR.** We do not tolerate any forms of forced labour, including trafficked labour and servitude. No employee, whether working directly for us or for one of our suppliers, business or joint venture partners, should be subjected to debt bondage, restriction of freedom of movement, or confiscation of personal papers. All forms of intimidation, including physical and verbal abuse and harassment, will not be tolerated.
- **CHILD LABOUR.** We do not tolerate child labour. No child under the age of 13 should be working, and no young person under the age of 18 should be employed in hazardous work. We support and follow the standards established by ILO Conventions No.138 (Minimum Age), No.182 (Worst Forms of Child Labour), and No.184 (Health & Safety in Agriculture), and all national regulation

⁵ In line with our obligations under the UK Companies Act (2006) and UK Modern Slavery Act (2015)

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implemented in the countries in which we operate to uphold these ratified conventions. Light work on family farms may be permitted within the hours and conditions determined by national legislation, provided this does not interfere with schooling, health, or personal development, as established by Article 7 in ILO Convention No.138. We consider that decent youth employment above the nationally-determined legal working age can be an important contribution to young people's welfare, their future, and to rural economic livelihoods.

- **FREEDOM OF ASSOCIATION.** All employees, whether working directly for us or for one of our suppliers, business or joint venture partners, should enjoy the right to join or form trade unions of their own choosing and bargain collectively. There should be no fear of retaliation for communicating openly about workplace issues and conditions.
- **HEALTH AND SAFETY.** We do not tolerate unsafe working conditions. We are committed to providing excellent care for our employees and everyone involved in our business. We provide a healthy, safe and productive working environment for all our employees and visitors. All employees, whether working directly for us or for one of our suppliers, business or joint venture partners, should have the right to work in a safe and sanitary environment, where the appropriate training and equipment are provided to mitigate the risk of accident or injury.

RELATED CONTENT

This Policy will be publicly available on our corporate website and will be communicated to employees and stakeholders. It will be subject to regular review (the aim is annually).

Additional policies should be considered alongside this Policy, including the [Code of Conduct](#), [Supplier Code of Conduct](#), [Speaking Up Policy](#), and the [Modern Slavery Statement](#).

STEFAN BOMHARD

Chief Executive Officer

August 2022