IMPERIAL BRANDS

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FURTHER INFORMATION
Use this button to find further information on this topic.

QUESTIONS & ANSWERS
More questions and answers to guide you can be found here.

SPEAKING UP
For details on how to speak up click on this icon throughout the code.

* Implementation subject to works council approval where required

OUR VALUES

We can

Everything is possible,
together we win

I own

See it, seize it, make it happen

I am

My contribution counts, think free,
speak free, act with integrity

We surprise

New thinking, new actions,
exceed what's possible

I engage

Listen, share,
make connections

We enjoy

Thrive on challenge,
make it fun

DEAR COLLEAGUE

ACTING RESPONSIBLY IS KEY TO SUSTAINING OUR GLOBAL REPUTATION AS A TRUSTED PARTNER AND EMPLOYER. AS WE SAY WHEN WE TALK ABOUT OUR VALUES, "WE TAKE PRIDE IN WHAT WE DO AND HOW WE DO IT. ACTING RESPONSIBLY AND WITH INTEGRITY HAS HELPED US CREATE AND SUSTAIN A SUCCESSFUL BUSINESS."

The complex challenges we face in our markets and our worldwide scale mean we are under constant scrutiny. We may operate in a controversial market but the way we do business should never be.

Collective and individual actions can have a powerful impact on our reputation with our consumers, customers, shareholders, communities and governments. In an increasingly connected world, it has never been more important to ensure all our activities are conducted with the utmost integrity.

Our revised Code of Conduct (code) is essential to our long-term sustainability and sets out the standards of responsible behaviours we should all follow in every part of Imperial Brands. Your commitment to the standards set out in the code is critical to supporting our business strategy so please read the code and make sure you clearly understand what is expected.

Alison Cooper
Chief Executive

DEAR COLLEAGUE

We are each responsible for behaving with integrity regardless of our role. Please use the code to help you make the right choices.

You should comply with the code at all times. And you should comply with our policies and standards and with the laws and regulations that affect your role.

But the code and even our policies and standards can never cover every situation. Remember to use your judgement and be guided by our values. If you are ever unsure of what to do, ask for help.

Talk to your colleagues to get their perspective, or speak to your people manager or an expert from an appropriate function. They will help you find the right way forward.

And if you have a concern or see something that is against the law or the code you should speak up. You'll find details on how to do so within the code.

John Downing
Company Secretary

WORKING STRONGER AND BETTER TOGETHER

We've built our business by working stronger and better together.

Our values are the basis for the code. Together, our values and the code help us to make the right decisions. The code helps us deal with situations that may raise ethical and legal questions.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

IMPORTANCE OF THE CODE AND HOW IT WORKS

FOLLOWING THE CODE

All of our people are expected to follow the code. We expect the people that work with us to be familiar with the code and follow it when acting on our behalf.

The sections in the code are: **Our People**, **Our Company**, **Our Customers and Suppliers** and **Our Communities**.

OUR RESPONSIBILITIES

We each have a role to play in creating a working environment that promotes integrity, teamwork and trust. Each of us is responsible for:

- Complying with the law and the code, and acting responsibly, with integrity and in good faith
- Treating everyone fairly and with respect, encouraging open communication and thinking about how our decisions affect others
- Building trust by asking questions, raising concerns and speaking up.

RESPONSIBILITIES OF PEOPLE MANAGERS

If you're a people manager:

- Share and explain the code
- Make sure our people understand the code
- Be a role model by following the code
- Encourage our people to ask questions, raise concerns and speak up. When they do, you should listen carefully and act appropriately.

WE CAN …create a safe, ethical and trustworthy workplace by supporting our people when they ask questions or raise concerns.

MAKING ETHICAL DECISIONS

It's important that we make decisions we can be proud of. If you have concerns as to what course of action you should take in any given situation, ask yourself:

THE IMPORTANCE OF ASKING FOR HELP AND SPEAKING UP

By sharing our opinions and concerns we can innovate, improve and become more effective. By telling people about unsafe conditions or improper behaviour we can reduce risks and resolve issues to create a better, safer workplace.

If you suspect that a breach of the law or of the code has taken place you should raise your concerns. You can speak to:

- People manager
- Human Resources
- Governance Team
- Legal Counsel or Group Legal
- The Company Secretary.

If you do not feel comfortable speaking up to somebody inside the company you can raise your concerns independently using our **Speaking Up service**.

NO TOLERANCE FOR RETALIATION

We do not tolerate retaliation against an individual who discloses an actual or suspected breach of the code or helps with an investigation. Retaliation may result in discipline, up to and including dismissal.

HOW WE UPHOLD THE CODE

GOVERNANCE

We operate an integrated approach to governance, aligned to the "three lines of defence" model. We provide guidance, training and tools to help all of us comply with the code, our policies and standards and with the laws and regulations that affect us.

Our Company Secretary is responsible for oversight of the Group's governance structures, controls and activities. "Second line" centres of expertise provide clarity of understanding throughout the Group in order to drive good corporate and individual conduct.

I OWN

...the responsibility for behaving with integrity in everything I do.

INVESTIGATIONS

We have processes to ensure that concerns are handled consistently across the business. All investigations are conducted in accordance with our legal obligations, and, where possible, we will protect confidentiality.

DISCIPLINARY ACTION

Individuals involved in breaches of the code may be disciplined up to and including dismissal. Breaches of the law may also be subject to penalties determined by a court or other government entity.

STRONGER, BETTER, TOGETHER

WITH OUR PEOPLE

WE HAVE A STRONG IMPACT ON THE PEOPLE WE WORK WITH.
WE ALWAYS TRY TO BUILD A WORK ENVIRONMENT THAT PROMOTES INTEGRITY, TEAMWORK, DIVERSITY AND TRUST.

10 | Valuing diversity and inclusion and preventing harassment
11 | Promoting a safe and healthy workplace
12 | Respecting human rights
13 | Using social media responsibly

PEOPLE ARE PEOPLE

We respect each person for who they are and what they can do, regardless of age, race, origin, gender, sexual orientation, disability, political views, religion, marital status, physical or mental health or any other legally protected status.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

VALUING DIVERSITY AND INCLUSION AND PREVENTING HARASSMENT

WE TREAT EVERYONE FAIRLY AND WITH RESPECT. WE RECOGNISE INDIVIDUALS FOR WHO THEY ARE AND WHAT THEY CAN DO.

WHY IT'S IMPORTANT

Working stronger and better together means that we respect each other's views and input. It's not just about compliance; we do this because it is right. Bringing together diverse teams can help drive innovation and performance through challenging perspectives.

WE ENJOY

...an equal opportunities work environment where each person is recognised for who they are and what they contribute.

WHAT WE DO

- Create a work environment that allows equal opportunities so our people are employed fairly, safely and in compliance with applicable employment laws and regulations
- Work with works councils, employment unions and worker associations in countries where they exist
- Demonstrate respect for others for the value they bring regardless of their culture, beliefs and lifestyles.

WHAT WE DON'T DO

- Discriminate
- Accept or contribute to anything that excludes an individual or group
- Harass, abuse or be perceived as offensive, intimidating, malicious or insulting
- Fail to speak up when others are being mistreated.

GOING ABOVE AND BEYOND

Our environment, health and safety standards often exceed what is required by law because we want to provide the very best care for our people.

FURTHER INFORMATION

QUESTIONS & ANSWERS

SPEAKING UP

PROMOTING A SAFE AND HEALTHY WORKPLACE

WE WANT A HEALTHY, SAFE AND PRODUCTIVE WORKING ENVIRONMENT FOR ALL OUR PEOPLE, BUSINESS ASSOCIATES, VISITORS AND NEARBY COMMUNITIES.

WHY IT'S IMPORTANT

Taking care of ourselves and others involved in our business is important. It's the right thing to do and creates a positive working environment.

I AM ...committed to acting with integrity and maintaining a safe and healthy workplace.

WHAT WE DO

- Take responsibility for the health, safety and well-being of ourselves and have due concern for others
- Follow all health and safety procedures in the workplace, even if they are stricter than the local legal requirements
- Speak up if we witness or suspect any type of safety issue (for example, an accident, incident, near miss or breach), substance use, abuse or violent behaviour.

WHAT WE DON'T DO

- Come to work under the influence of drugs or alcohol, or cover for those who do
- Tolerate or participate in any violence, threatening behaviour or physical intimidation
- Act in any way that would put our own health and safety, or that of another, at risk.

THE RIGHT CHOICE

Q: We are in the process of setting up a partnership with a new supplier, but we are concerned that their employee work conditions are below the level we expect. The supplier has given us a commitment that they will make the required changes if they are awarded our contract. Given this commitment, can we go ahead?

A: We expect our suppliers to treat their workers fairly and comply with our standards and the law. This supplier may not be a suitable business partner. You should discuss your concerns with your people manager, Group Procurement and your Legal Counsel.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

RESPECTING HUMAN RIGHTS

WE VALUE THE SAFETY, DIGNITY AND WELL-BEING OF OUR PEOPLE AND THOSE WHO SUPPORT OUR BUSINESS.

WHY IT'S IMPORTANT

We respect human rights throughout our operations and we expect our business partners to do the same. This limits reputational risk and advances better working partnerships. We require our suppliers and appropriate organisations to comply with, or exceed, international labour standards.

Respecting human rights is important for our people, our external reputation, our supply chain sustainability and our licence to operate. We respect the most fundamental of human rights including no child labour, no forced labour and the freedom of association.

WHAT WE DO

- Have concern for our peoples' health, safety, dignity and well-being
- Follow our employment practices and guidance
- Consider human rights within potential new investments and joint ventures
- Work with our suppliers to improve supply chain standards.

WE CAN

...have a positive impact by making responsible business decisions which promote the safety, dignity and well-being of everyone involved.

WHAT WE DON'T DO

- Employ any person under 15 years old, or less than the local minimum employment age or mandatory school age—whichever is higher
- Employ any person under 18 years old to undertake tasks which are hazardous
- Fail to speak up if we see a human rights violation.

THE RIGHT CHOICE

Q: My friends and I are all very active on a social networking site. We post pictures and reports on our trips and adventures. I'll be on business travel next week attending a work conference. Can I post pictures and reports during my journey?

A: You can post about your travels and what you do in your personal time while on the trip, but you should not make any comments regarding the content of the work conference or display any pictures of yourself where our company is negatively represented.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

USING SOCIAL MEDIA RESPONSIBLY

WE USE SOCIAL MEDIA RESPONSIBLY TO REPRESENT THE BEST OF WHAT WE AND THE BUSINESS HAVE TO OFFER.

WHY IT'S IMPORTANT

Our reputation depends on acting responsibly and with integrity. Social media can help us share company information, our positions, our brand and product information. However, a simple mistake can negatively affect our reputation very quickly.

WE ENJOY

...using social media in a way that supports Imperial Brands.

WHAT WE DO

- Be careful to represent ourselves and our company in a positive way to protect our values and reputation
- Distinguish between personal and business communications
- Identify ourselves as an employee when endorsing our company or products
- Comply with our social media guidelines.

WHAT WE DON'T DO

- Allow time spent on social media to interfere with our work
- Make negative or false statements that could be perceived as breaking the law
- Use social media to spread inaccurate information or to set up fake accounts
- Represent the company on social media platforms unless cleared to do so on official company social media accounts e.g. Twitter
- Disclose any confidential, private or proprietary information about our company, customers, suppliers or colleagues
- Post anything that appears to have been endorsed by, or on behalf of, our company when it hasn't been
- Use social media to sell or market our products unless permitted by local laws or regulations, and cleared with Global Brands.

STRONGER, BETTER, TOGETHER

WITH OUR COMPANY

WE BELIEVE IN TRUST, FAIRNESS AND HONESTY, AND EVERYTHING WE DO REFLECTS THIS.

15 | Ensuring the accuracy of company records and disclosures
16 | Using company resources
17 | Intellectual property
18 | Avoiding conflicts of interest
19 | Protecting personal information
20 | Successfully managing information
21 | Keeping information confidential
22 | Managing information security
23 | Avoiding insider trading

THE RIGHT CHOICE

Q: It is the last week in this reporting period. So that we can return an excellent result, can I record a sale now that will not be invoiced and delivered until next week?
A: No. Costs and revenue need to be recorded in the correct time periods. The sale has not officially been completed until there is evidence of a sales agreement, title for the goods has passed, and the sales price can be determined and is collectible. Until then it would be a misrepresentation to include this sale.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

ENSURING THE ACCURACY OF COMPANY RECORDS AND DISCLOSURES

WE HONESTLY, ACCURATELY AND OBJECTIVELY REPORT AND RECORD ALL OF OUR FINANCIAL AND NON-FINANCIAL INFORMATION.

WHY IT'S IMPORTANT

Having honest and complete financial and business records means we can make better business decisions, safeguard our resources and achieve our legal and regulatory requirements. Falsifying records and accounts or misrepresenting the facts is fraud.

I AM

...honest in all my reporting of financial information because it helps to ensure the future success of our company.

WHAT WE DO

- Be honest and accurate in all reports, disclosures, forecasts and analyses
- Follow all laws, external accounting requirements and company procedures for reporting information
- Avoid cash transactions whenever possible. If there is no alternative, make sure the cash transactions are authorised, properly recorded and documented
- Be honest when submitting and approving travel and expense claims
- Ensure any contractual commitments we make on behalf of our company are properly approved
- Raise any concerns about the accuracy or completeness of financial reports
- Comply with all applicable tax laws and regulations in the countries where we operate and be open and transparent with the tax authorities.

WHAT WE DON'T DO

- Prepare or submit misleading information
- Make a dishonest or deceptive entry in any report or record
- Misrepresent the correct purpose of any transaction
- Create an unrecorded or improperly described fund
- Sell, transfer or dispose of company assets without prior authorisation and appropriate documentation
- Falsely exaggerate or move sales volumes or profit between reporting periods
- Improperly modify or damage any company record
- Provide any information about our transactions that would allow a customer or supplier to prepare inaccurate or deceptive financial statements
- Engage in deliberate illegal tax evasion or facilitate such evasion on behalf of others.

THE RIGHT CHOICE

Q: I work as a book keeper and one of my key tasks is to arrange for the payment of invoices. Every month, I pay a retainer to a consultancy company but I am not aware of the company actually providing us with any products or services. Should I keep paying this retainer?

A: Payment for services we do not receive would constitute misuse of company resources. You should ask the person authorising the payment what it is for. If you do not receive a satisfactory answer, you should talk to your people manager and may need to talk to a member of the finance team.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

USING COMPANY RESOURCES

WE ENSURE PROPER AND APPROPRIATE USE OF COMPANY RESOURCES.

WHY IT'S IMPORTANT

Company resources include company money, information systems (such as laptops and phones), equipment (such as vehicles), facilities, information, intellectual property and company time. These resources are supplied to us for business purposes. Inappropriate use of company resources has a direct impact on the profitability of our business.

I OWN ...the responsibility for protecting company resources.

WHAT WE DO

- Use company resources in a way that is appropriate, reasonable and lawful
- Make sure that we spend company money in the best interests of the company
- Comply with company policies on travel and expenses
- Understand that the work that we do for the company belongs to the company
- Accurately report our use of company time
- Make only reasonable and permitted use of company information systems such as email or phones
- Respect property and resources that belong to other organisations such as our business partners
- Speak out if we notice company resources being used improperly.

WHAT WE DON'T DO

- Use company resources in a way that could compromise our business
- Use company resources for personal gain.

THE RIGHT CHOICE

Q: We have developed a new product that will launch soon. The product is a line extension to one of our existing international brands. I know that we own the rights to this brand, so is there any need to complete legal checks?

A: Yes. Even if you are making use of a brand name which we already own, your new product may feature new elements such as logos, images or variant names which could infringe the rights and assets of others. Check all new product or promotional developments with Group IP within Group Legal.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

INTELLECTUAL PROPERTY

WE PROTECT OUR INTELLECTUAL PROPERTY AND RESPECT THE INTELLECTUAL PROPERTY RIGHTS OF OTHERS.

WHY IT'S IMPORTANT

Our trade marks, design rights, patents, copyrights and confidential business information protect the results of our hard work and provide us with a competitive advantage. If our intellectual property assets are misused, our interests and those of our consumers are damaged.

WE CAN

...ensure a competitive advantage by identifying and protecting our intellectual property.

WHAT WE DO

- Protect our intellectual property and report any 'copycat' products, suspected counterfeit products or other items that may infringe our intellectual property rights
- Respect the intellectual property rights of others
- Make certain that we are the owner of intellectual property rights in any materials or products created or developed for us.

WHAT WE DON'T DO

- Use names, trade marks or other design elements which consumers might associate with others when selling, marketing or promoting our products
- Use technology, including software, which may infringe the intellectual property rights of others.

WHAT MAKES A CONFLICT?

Conflicts of interest can arise from a number of situations, including:

- A partner, family member or close relative is employed by one of our competitors, suppliers or customers
- A romantic relationship involves an employee and his or her people manager
- A reporting line exists between relatives
- An employee, partner, family member or close relative has a financial interest in a current or potential competitor, supplier or customer
- A second job competes with or causes issues with an employee's ability to do his or her job.

If you have any reason to believe that you are, or may be, in a position where a conflict of interest could arise, you should disclose this to your people manager.

AVOIDING CONFLICTS OF INTEREST

WE ACT WITH INTEGRITY AND TRANSPARENCY, SHARING INFORMATION ABOUT RELATIONSHIPS, FINANCIAL INVESTMENTS, SECOND JOBS OR OTHER OPPORTUNITIES THAT MAY INFLUENCE OUR BUSINESS IN ANY WAY.

WHY IT'S IMPORTANT

Personal relationships and conflicts of interest can affect our ability to make a decision in the best interests of the company.

I OWN

...the responsibility for avoiding conflicts of interest by disclosing anything that could violate a company policy or affect my ability to do my job.

WHAT WE DO

- Avoid situations where personal relationships or financial interests influence or conflict with the best interests of our company
- Disclose or ask for approval before making any type of personal investment that may conflict with the best interests of our company
- Follow procurement processes for any potential business opportunities or investments.

WHAT WE DON'T DO

- Abuse our position—for personal benefit or for the benefit of someone with whom we have a personal relationship
- Hide any personal relationship, connection or employment that could be considered a conflict
- Intentionally ignore or hide business opportunities from the company.

THE RIGHT CHOICE

Q: I would like to send a colleague a birthday gift to her home as a surprise. I asked Human Resources to give me her personal address, but they refused. They told me that they can't give me her home address because doing so would be a violation of data protection laws. Is that true?

A: Yes. Human Resources does not have permission to share your colleague's home address with you without her express permission.

FURTHER INFORMATION
QUESTIONS & ANSWERS
SPEAKING UP

PROTECTING PERSONAL INFORMATION

WE RESPECT PERSONAL INFORMATION AND HANDLE IT WITH CARE AND IN ACCORDANCE WITH OUR LEGAL OBLIGATIONS.

WHY IT'S IMPORTANT

We hold personal information about our people, customers, suppliers and others. We are obliged to protect and respect this information to ensure that we comply with data privacy laws. Some personal information is sensitive and can only be lawfully processed with particular care.

I ENGAGE

...in protecting the personal information that I have access to.

WHAT WE DO

- Only collect or use personal information for legitimate purposes
- Explain why we need the personal information and how it will be used, seeking consent where required
- Only share personal information if we are permitted to and if we have appropriate controls
- Keep personal information secure
- Restrict access to personal information to those who need to know or have a right to know
- Keep personal information accurate and up to date
- Delete or destroy personal information as soon as appropriate
- Respect individuals' rights to access, amend, delete and object to use of their personal information
- Design our processes and systems with privacy in mind.

WHAT WE DON'T DO

- Transfer personal information to other countries, unless permitted and with adequate protection
- Allow people to handle personal information unless they understand their responsibilities.

THE RIGHT CHOICE

Q: I have been given files containing documents and emails from a colleague who has left the business. Most of the documents seem quite old and they are no use to me. I would like to dispose of them, although they relate to an old customer. Can I?

A: Check with your colleagues and your people manager. Remember, you should make certain that there is no legal or business reason for keeping the documents before you dispose of them.

FURTHER INFORMATION

QUESTIONS & ANSWERS

SPEAKING UP

SUCCESSFULLY MANAGING INFORMATION

WE USE OUR BUSINESS RECORDS TO CAPTURE VALUABLE INFORMATION WHICH ENABLES US TO DEMONSTRATE THAT WE ARE FULFILLING OUR REGULATORY AND LEGAL OBLIGATIONS.

WHY IT'S IMPORTANT

Business records can take many forms and be stored in many different ways, both within our company and by our business partners. We are required by law, regulation and business needs to keep records for certain periods of time depending on their content and nature.

I ENGAGE

...in responsible management of our business records by making sure that the information the business needs is clear and accessible to those who need it.

WHAT WE DO

- Carefully and accurately record the business activities for which we are responsible
- Keep information organised, identifiable and accessible
- Ensure that records are kept in a way which allows them to be shared appropriately
- Where possible classify information to help handle and protect it appropriately
- Comply with all legal and business requirements for keeping records
- Review records on a regular basis and safely dispose of those which no longer need to be kept or which should be disposed of in accordance with law (including to comply with rules on data protection)
- Comply with any requests to suspend the disposal of records, including in response to pending litigation or regulatory investigation
- Respect statutory document and record retention periods.

WHAT WE DON'T DO

- Share business records with people who don't need to see them
- Store business records where they cannot be found by the people who need them
- Dispose of business records without checking first
- Ignore classification markings.

WHAT IS CONFIDENTIAL INFORMATION?

Examples of confidential information include product and process development, sales, marketing and financial data, business plans, senior management changes, information about acquisitions and mergers and commercially sensitive information. If you are not sure if an item is considered confidential, then ask your people manager.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

KEEPING INFORMATION CONFIDENTIAL

WE ONLY SHARE CONFIDENTIAL INFORMATION WITH THOSE WHO NEED TO SEE IT.

WHY IT'S IMPORTANT

We create, use and share confidential information on a daily basis. It is important to protect confidentiality in order to safeguard our own and the company's interests and reputation.

I OWN ...the responsibility for securing confidential information and sharing it only with those who have a need to know.

WHAT WE DO

- Share confidential information only with those who need to know or have a right to know
- Make sure that the people who we share confidential information with understand the restrictions that apply to them
- Take additional security steps when required, for example good passwords or encryption
- Take particular care when travelling or in public areas
- Use non-disclosure agreements when sharing information with our business partners
- Respect confidential information that belongs to others.

WHAT WE DON'T DO

- Disclose to others inside the company information that is not publicly available, unless they have a business reason to know
- Disclose information to people or organisations outside the company, except where disclosure is required for business purposes or by law
- Seek to obtain or use confidential information relating to other people including our competitors, even if we indirectly receive the information
- Make use of confidential information from a former employer.

THE RIGHT CHOICE

Q: I have an urgent project and I need to take some data home to work on it. I'm going to upload it to my personal cloud storage service. Is that an information security issue?

A: Yes. Your personal cloud storage provider has no legal responsibility to keep company information secure. You may not upload this data to any cloud storage service that is not approved by the company. Talk to your local IT Manager or Group IT.

MANAGING INFORMATION SECURITY

WE KEEP OUR COMPANY INFORMATION, BUSINESS PROCESSES AND SYSTEMS SAFE FROM MISUSE.

WHY IT'S IMPORTANT

Information about our business, our people, customers, suppliers and business partners is central to our business success and we are obliged to keep it secure by protecting it from loss or damage and unauthorised access, use, change or disclosure.

I OWN

...the responsibility for safeguarding our information systems, business processes and information.

WHAT WE DO

- Protect company information systems from unauthorised use or theft
- Use good passwords
- Protect sensitive information when travelling or sharing it with others
- Always safeguard the security of our information when using internet/web services
- Only give access to our information, business processes or information systems to those who have a legitimate business need and who are properly authorised
- Work with suppliers who properly protect our information and information systems
- Speak up if we notice our information, business processes or information systems being used inappropriately
- Report any loss of sensitive company information or any attack on our information systems.

WHAT WE DON'T DO

- Use our company email or internet/web services (cloud services, file-hosting, social media, etc.) in a way that could damage the reputation of the company or commit the company to something over which we have no authority
- Install any unapproved applications or software on company information systems
- Disable or bypass security measures on company information systems
- Access, store or share anything that could be considered offensive to others or could expose the company to legal action.

WHAT ARE SOME EXAMPLES OF INSIDE INFORMATION?

- Financial results prior to publication
- The content of our draft Annual Report and Accounts
- Major organisational changes
- Factory closures or other restructuring information
- News of possible acquisitions, disposals, takeovers, mergers or joint ventures.

AVOIDING INSIDER TRADING

WE MUST ENSURE THAT WE DO NOT BREACH INSIDER TRADING LAWS.

WHY IT'S IMPORTANT

Our people may have access to non-public information about the financial performance or future plans of the company. If this information could influence our share price or investors' decisions then it may be 'inside information'. It is illegal to use inside information (or 'material inside information') to buy or sell securities such as our company shares.

I AM …trusted not to make improper use of non-public financial or business information.

WHAT WE DO

- Keep inside information inside the company
- Comply with our rules on the release of information
- Ensure that we have permission to trade Imperial Brands shares (if required).

WHAT WE DON'T DO

- Trade Imperial Brands shares or any other securities based on inside information. Shares include 'American Depositary Shares' (ADSs or ADRs)
- Advise anyone else, whether inside or outside the company, to buy or sell shares based on inside information
- Make use of inside information relating to other companies
- Spread false or inaccurate information about Imperial Brands or other publicly listed shares in order to influence the price of those shares, a practice known as 'market abuse'.

STRONGER, BETTER, TOGETHER

WITH OUR CUSTOMERS AND SUPPLIERS

OUR RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS SHOULD BE OPEN, STRONG, FAIR AND BASED ON TRUST; WE APPLY OUR VALUES AND STANDARDS WHEN WE WORK WITH THEM.

25 | Combating illicit trade
26 | Competing fairly
27 | Gathering competitive intelligence
28 | Delivering on quality, value and service
29 | Marketing responsibly
30 | Creating successful supplier partnerships
31 | Fighting bribery and corruption
32 | Giving and receiving gifts and entertainment
33 | Avoiding money laundering
34 | Complying with customs and tax requirements
35 | Complying with international sanctions and trade restrictions

ILLICIT TRADE PRODUCTS INCLUDE...

Contraband. Legitimate products purchased on a duty paid or duty free basis, but smuggled into and sold illegally in other markets in contravention of fiscal or customs laws. These products are also known as 'black market goods'.

Counterfeit. Products which illegally copy existing brands and which are manufactured and/or sold in violation of trade mark rights. Often smuggled into and sold illegally in other markets.

'Illicit Whites'. Cigarette products produced by small manufacturers (paying minimal tax at the point of manufacture). Often smuggled into and sold illegally in other markets.

COMBATING ILLICIT TRADE

WE ARE OPPOSED TO ILLICIT TRADE IN ALL FORMS AND COOPERATE WITH AUTHORITIES GLOBALLY TO HELP PREVENT ILLEGAL TOBACCO PRODUCTS FROM FINDING THEIR WAY INTO THE LEGITIMATE MARKET.

WHY IT'S IMPORTANT

There is clear evidence that illicit trade funds organised crime and terrorism around the world, so eliminating it continues to be one of our top priorities. We only supply high-quality products and illicit trade damages our reputation and steals our intellectual property.

WE CAN

...protect our brands by working to combat illicit trade.

WHAT WE DO

- Only supply product in quantities commensurate with the domestic consumption in the destination market and the permissible requirements of the travelling consumer
- Only conduct business with and supply products to customers who we are satisfied operate with honesty and integrity, are reputable and committed to honouring our Product Supply Compliance Policy
- Thoroughly investigate all incidences of product diversion and take appropriate action to mitigate the risk of further diversion
- Make our customers aware of our stand against illicit trade and their responsibility to follow the law and our standards
- Proactively work with governments and law enforcement agencies worldwide to provide training, support investigations and conduct forensic analysis of seized tobacco products as well as providing guidance on anti-illicit trade initiatives to ensure action is taken to protect our brands
- Review all customer data annually.

WHAT WE DON'T DO

- Expose ourselves to personal risk or danger when gathering or reporting suspected illicit trade
- Continue to supply customers who are involved in illicit trade
- Ignore any suspicion that a customer or supplier might be involved in the diversion of our products from the legitimate supply chain.

COMPETING FAIRLY

WE ARE COMMITTED TO COMPETING FAIRLY AND HONESTLY AND ADHERING TO ALL ANTI-TRUST AND COMPETITION LAWS THAT APPLY TO OUR BUSINESS.

WHY IT'S IMPORTANT

Competition laws are designed to encourage a free market and protect consumers and businesses. While these laws are complex and vary from country to country, we need to respect and comply with them. Failure to do so can have serious consequences such as very large fines, reputational damage or even imprisonment.

WE CAN

...drive business success while complying with competition laws.

WHAT WE DO

- Ensure that we understand the competition laws that apply to our market and comply with them
- Understand and comply with our Competition and Anti-trust Policy and other relevant competition materials
- Operate and compete independently of our competitors
- Avoid discussing any commercially sensitive topics with competitors such as pricing, terms of trade and new product launches
- Limit interaction with competitors and seek legal advice before entering into any type of agreement with a competitor
- Exercise a high level of caution in trade association meetings—even casual one-off/one-way exchanges of information with competitors can violate competition laws
- Ensure that we immediately remove ourselves from any questionable or inappropriate discussions that competitors may attempt to raise, and report the incident afterwards
- Where we have a dominant market position, consult our legal teams regarding marketing activities or sales initiatives such as discounting, promotions or trade programmes to avoid abusing our position and to ensure that we remain compliant with the relevant laws
- Comply with relevant competition laws when gathering or exchanging information. Please see the Gathering competitive intelligence section of the code.

WHAT WE DON'T DO

- Use our dominant position unfairly, in breach of applicable competition laws
- Force competitors from the market or prevent new competitors from entering it
- Make anti-competitive agreements with competitors including ones which:
  - Fix prices
  - Rig bids
  - Divide up markets, customers or product categories
  - Boycott a supplier, customer or distributor
- Exchange information directly with competitors or via an intermediary without legal approval (this applies to all forms of communication including social media, messaging systems and informal exchanges)
- Restrict territories or customer groups into which our customers and distributors can resell, unless we have proper justification for doing so
- Impose or agree to fixed or minimum resale prices with customers or distributors or dictate their profit margin or the maximum level of discount they can offer (unless local laws require us to do so).

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

WHAT ARE ACCEPTABLE SOURCES OF COMPETITIVE INTELLIGENCE?

Here's a list of some generally acceptable sources of competitive intelligence:

- The media
- The internet and company websites
- Reputable industry surveys
- Annual reports
- Public speeches of company executives
- Publicly available filings with government agencies
- Collecting data at point of sale through company supplied electronic equipment
- Talking with customers (but not with the specific purpose of obtaining confidential information relating to our competitors).

FURTHER INFORMATION
QUESTIONS & ANSWERS
SPEAKING UP

GATHERING COMPETITIVE INTELLIGENCE

WE MONITOR OUR COMPETITIVE ENVIRONMENT AND ANALYSE TRENDS TO DEVELOP OUR BUSINESS SO WE CAN MEET OUR CUSTOMERS' REQUIREMENTS.

WHY IT'S IMPORTANT

Understanding the environment in which we operate enables us to respond to our customers' requirements but we need to ensure that this is information which is gathered and used legally. Sharing information with competitors, including through an intermediary, can be a very serious breach of competition law.

I AM ...confident that the competitive information we gather is collected in a proper way.

WHAT WE DO

- We gather our information properly and legally
- Gain approval from Legal Counsel, external legal advisors or Group Legal before implementing any data exchange process which includes the provision of data to or from our competitors (including via intermediaries or third parties)
- Ensure that any industry reports/benchmarking surveys for which we provide data (such as pricing/volume data) are appropriately aggregated and historical.

WHAT WE DON'T DO

- Solicit or accept a competitors trade secrets or other confidential information
- Engage in industrial espionage or undercover surveillance to access information which is not publicly available
- Recruit competitors' employees for the purpose of obtaining confidential or commercially sensitive information
- Approach competitors' customers or employees to obtain confidential information
- Exchange commercially sensitive information or data (including sales data) with competitors (including via intermediaries or third parties) in breach of competition laws.

THE RIGHT CHOICE

Q: I am covering a sales area while the normal representative is on holiday. I have received complaints from customers who say the normal representative is sometimes rude and unhelpful. They may be exaggerating, but I don't want to ignore them. What should I do?

A: Talk to your colleagues about your concerns to see if they have had similar experiences with these customers. When the normal representative returns, share your experience in an open, honest and factual way with them and your people manager so they can resolve it together.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

DELIVERING ON QUALITY, VALUE AND SERVICE

WE DELIVER HIGH-QUALITY PRODUCTS AND SERVICES TO OUR CUSTOMERS AND CONSUMERS BY CONTINUOUSLY REVIEWING AND IMPROVING WORKING PRACTICES.

WHY IT'S IMPORTANT

Our sustainability, success and reputation depend on our ability to deliver excellent brands and services to both our customers and consumers.

WE ENJOY

...providing high-quality, excellent products.

WHAT WE DO

- Focus on quality in everything we produce and everything we do
- Continually seek to improve efficiencies in our business processes, services and product quality
- Follow and maintain our defined processes
- Ensure that our relationships with business partners including customers, suppliers and third party producers are managed in accordance with our standards
- Encourage teamwork to improve our performance standards
- Maintain effective controls so that any standard or quality issue is quickly identified.

WHAT WE DON'T DO

- Accept or ignore poor standards
- Fail to act after noticing a quality issue.

THE RIGHT CHOICE

Q: Marketing and advertising legislation in my market is much less strict than the rules in our International Marketing Standard (IMS). Can I ignore the IMS?

A: No. Our IMS underpins our commitment to marketing our products responsibly. If your market has laws or standards that are less strict you should apply the IMS.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

MARKETING RESPONSIBLY

OUR PRODUCTS ARE FOR ADULTS AND WE COMMUNICATE IN A RESPONSIBLE MANNER WITH ADULT CONSUMERS ABOUT OUR PRODUCTS.

WHY IT'S IMPORTANT

We are committed to marketing and advertising of our products responsibly within the laws, codes of practice and voluntary agreements of those countries in which we operate. We apply our Marketing Standards (MS) to consumer advertising / promotional materials and activities. Our MS take precedence except where local law demands a higher standard.

WE SURPRISE

...consumers with innovative marketing campaigns which comply with the law and our MS.

WHAT WE DO

- Have clearly visible health warnings on all our tobacco products
- Respect our MS and the local cultures which exist in our markets
- Describe our products in a way that is compliant with all relevant laws and regulations
- Verify that all claims we make are true and can be substantiated
- Ensure that our business partners are committed to marketing responsibly.

WHAT WE DON'T DO

- Advertise or market our tobacco products to those under 18 years old or non-smokers
- Use images or other content which could be perceived as being attractive to minors
- Claim that the consumption of tobacco products is safe.

REVIEWING OUR SUPPLIERS

We regularly review our suppliers using objective criteria, such as suitability of product or service, price, quality, performance, trustworthiness and reliability.

FURTHER INFORMATION

QUESTIONS & ANSWERS

SPEAKING UP

CREATING SUCCESSFUL SUPPLIER PARTNERSHIPS

WE SELECT AND DO BUSINESS WITH SUPPLIERS WHO CONDUCT THEIR BUSINESS AFFAIRS IN A PROFESSIONAL AND ETHICAL MANNER.

WHY IT'S IMPORTANT

Our success depends on establishing and maintaining open, honest and fair partnerships with trusted suppliers.

WE ENJOY

...trustworthy and reliable supplier partnerships which allow us to conduct our business with integrity.

WHAT WE DO

- Follow our established procurement processes
- Perform due diligence when selecting suppliers to ensure that their practices will not damage our reputation
- Ensure that our code principles are reflected in supplier contracts
- Encourage and support our suppliers to adopt appropriate standards
- Treat our suppliers and business partners with fairness and integrity.

WHAT WE DON'T DO

- Accept or ignore supplier activities which we suspect may be in breach of the code or standards
- Allow a conflict of interest or personal bias to influence how we select or work with suppliers.

WHAT IS A BRIBE?

- Bribery may not be obvious. It can include money, services, gifts, excessive or unjustified entertainment and other similar benefits (including favours). Giving, offering or accepting any of these can be considered bribery, if the intention is to secure or retain business or gain any form of advantage.

FACILITATION CLASH

- Facilitation payments are a type of bribe. An example is where a government official is given money or goods to perform (or speed up the performance of) an existing duty.
- Facilitation payments are never permitted, regardless of location, local laws or culture.
- Should a situation arise which you believe has the potential to expose you to personal threat if you refuse to make a facilitation payment, you should immediately speak up.
- If you find it is necessary to make a payment in order to prevent an immediate threat to your safety, you should do so and report the incident in writing to your people manager and Group Security without delay.

FIGHTING BRIBERY AND CORRUPTION

WE DO NOT TOLERATE BRIBERY OR CORRUPTION.

WHY IT'S IMPORTANT

We are proud of our reputation for doing business in the right way. Compliance with bribery and corruption laws is compulsory, wherever we do business, and some of these laws can be enforced across borders. Violating bribery and corruption laws is a serious criminal offence for the individuals and the company concerned and can result in large fines and even imprisonment.

WE CAN

...protect and enhance our reputation for doing business in the right way by refusing to engage in or ignore corrupt behaviour.

WHAT WE DO

- Address 'red flags' that indicate there may be a risk of corruption
- Take extra care in markets where there may be an increased risk of corruption
- Be especially cautious when dealing with government officials
- Ensure that consultants working on our behalf have cleared due diligence checks, been formally approved, and are contractually obliged to meet our standards
- Actively discourage the use of bribes or facilitation payments in our markets
- Report any request or demand for a potentially corrupt payment.

WHAT WE DON'T DO

- Offer, pay, authorise or accept a bribe, regardless of local law or culture
- Offer, pay or authorise facilitation payments
- Engage in corrupt behaviour
- Ask or allow anyone else (such as our distributors, consultants or representatives working on our behalf) to make a corrupt payment for us
- Offer or give anything of value to anyone for the purpose of securing, retaining or facilitating business (such as payments to reduce taxes or customs duties)
- Put ourselves at risk of harm in order to avoid making a payment that could be considered corrupt
- Ignore or fail to report corrupt activity.

WHAT IS A 'PUBLIC OR GOVERNMENT OFFICIAL'?

The definition of a 'public or government official' is very broad and includes:

- Officials and employees of all branches of government, including local and regional authorities, judges, customs and police forces
- Political party officials, employees of political parties and candidates for political office
- Officials or employees of public international organisations
- Those who run or work for government owned or controlled businesses
- Members of a royal family
- Family members of a government official
- People who support or influence government officials, such as consultants.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

GIVING AND RECEIVING GIFTS AND ENTERTAINMENT

WE EXCHANGE GIFTS AND ENTERTAINMENT TO BUILD GOODWILL IN OUR BUSINESS RELATIONSHIPS AND NOT FOR ANY IMPROPER PURPOSE.

WHY IT'S IMPORTANT

Exchanging gifts and entertainment can help us to build stronger and better business relationships, show courtesy or promote goodwill. But we should never offer or accept gifts and entertainment if doing so could give rise to an obligation or give the impression of an obligation. Improper exchange of gifts and entertainment can be seen as a bribe.

I OWN

...the responsibility for understanding and applying our gifts and entertainment guidelines and politely declining gifts or entertainment that breach our company rules.

WHAT WE DO

- Ensure that gifts and entertainment are modest and appropriate and have a justifiable business purpose
- Avoid giving gifts, favours or entertainment to public or government officials
- Follow the rules contained in our guidelines for gifts and entertainment to or from any one entity in a financial year which exceed 50GBP or market limit in value
- Record gifts and entertainment in our gifts and entertainment register.

WHAT WE DON'T DO

- Offer or accept cash or cash equivalents as a gift
- Offer or accept anything that could be perceived as illegal
- Offer or accept anything that we might feel uncomfortable about if it became public knowledge or that might harm the reputation of the company.

‘RED FLAGS’ FOR MONEY LAUNDERING

Be on the lookout for suspicious activity that may indicate possible money laundering activities, such as customers who:

- Are unwilling to provide personal or business background information
- Want to pay using large amounts of cash
- Appear unconcerned with price or other terms and conditions of purchase
- Want to be paid into a bank account in a country different from their country of residence or operation
- Make transactions that are unusual or inconsistent with their trade or business, or are substantially different from past transactions.

AVOIDING MONEY LAUNDERING

WE TAKE ACTIVE STEPS TO AVOID THE RISK OF MONEY LAUNDERING.

WHY IT’S IMPORTANT

Money laundering is the process of creating the appearance that funds obtained from criminal activities are legitimate or originated from a lawful source. It is a serious criminal activity. We need to ensure that we aren’t used by others to launder money or we could be held responsible.

WE CAN

...protect our integrity by looking out for ‘red flags’ or other suspicious activity that may indicate criminal activity and by following our ‘Know Your Customer’ procedures.

WHAT WE DO

- Follow our ‘Know Your Customer’ procedures
- Only accept payment from customers, distributors and other businesses or individuals who we normally do business with and who have been subjected to due diligence checks
- Have defined procedures in place to verify the identity and legitimate operation of our customers
- Maintain detailed processes which prevent the acceptance of any potentially suspicious payments
- Learn how to recognise types of transactions associated with money laundering activity and report any of these if we suspect or observe them.

WHAT WE DON’T DO

- Accept any cash or cash equivalents that are, or could be, the proceeds of criminal activity
- Deliberately or recklessly ignore any of the ‘red flags’ that suggest improper financial transactions might be taking place.

THE RIGHT CHOICE

Q: I would like to appoint a local agent to handle our excise duty declarations. Is there anything I need to consider before doing so?

A: Yes. We are responsible for what agents, intermediaries or advisers do on our behalf. The agent should be vetted and their use formally approved. The terms of the relationship should be recorded and the agent, intermediary or adviser must be instructed to act consistently with the code. If the relationship is ongoing, verification checks may be needed. It should also be clear how the agent will inform you of any issues that may arise.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

COMPLYING WITH CUSTOMS AND TAX REQUIREMENTS

WE COMPLY WITH CUSTOMS AND TAX LAWS AND REGULATIONS.

WHY IT'S IMPORTANT

Our products are subject to a range of customs and tax laws and regulations. We need to understand these and comply with them fully.

I OWN

...the responsibility for consulting with my local customs experts or CoE International Customs for any advice needed.

WHAT WE DO

- Comply with regulations which specify import duties, value added tax, excise tax and similar that may be payable in relation to our products in addition to tax, bonding or other regulations that govern tax, duty free or tax suspension shipments
- Ensure destruction and tax reclaim documentation is accurately completed, including product volume and values
- Ensure our documentation is produced in compliance with local tax and customs rules and regulations
- Ensure our product is destroyed in a supervised environment with local accounts and financial records accurately updated
- Report any differences in products received or inaccuracies in documentation to the relevant customs authority
- Be honest, accurate and open in all of our statements and certifications
- Know and comply with rules and restrictions related to working with public officials.

WHAT WE DON'T DO

- Treat stock authorised for destruction as new or 'good' stock
- Fail to make a tax payment or alter paperwork to avoid making a payment
- Carry samples when travelling for business purposes
- Accept or ignore any suspected violation of our standards on customs and tax.

WHAT IS A SANCTION?

Sanctions can vary between countries and change over time, but generally they include restrictions or bans on:

- Commercial activities with named individuals and businesses
- Importing products from a sanctioned country
- Exporting products to a sanctioned country
- Moving products through a non-sanctioned country to a sanctioned country
- Financial transactions and activities involving a sanctioned country or individuals and businesses in those countries
- New investments in a sanctioned country
- Travelling to or from a sanctioned country
- Restrictions may also require us to obtain an export licence for specific products.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

COMPLYING WITH INTERNATIONAL SANCTIONS AND TRADE RESTRICTIONS

WE COMPLY WITH INTERNATIONAL SANCTIONS AND TRADE RESTRICTIONS.

WHY IT'S IMPORTANT

The United Nations, the European Union and many individual countries impose strict controls on exporting to and trading with specific named individuals, businesses and countries. Violations can result in criminal penalties and fines for our company and the individuals involved.

United States' sanctions are particularly strict. U.S. citizens and residents, as well as foreign citizens physically located in the United States, may not engage in any activities that involve certain sanctioned countries. U.S. sanctions even prohibit telephone calls or emails by anyone within the U.S. about conducting business in countries affected by the sanctions.

I OWN

...the responsibility for complying with international sanctions and trade restrictions and asking for help if I need it.

WHAT WE DO

- Understand what sanctions and trade restrictions are relevant to our roles and responsibilities
- Comply with sanctions and trade restrictions
- Ensure that compliance screening is carried out.

WHAT WE DON'T DO

- Accept or ignore any suspicion that international sanctions or trade restrictions are being violated
- Fail to check whether sanctions or trade restrictions apply.

STRONGER, BETTER, TOGETHER

WITH OUR COMMUNITIES

WE RESPECT OUR ENVIRONMENT AND THE COMMUNITIES IN WHICH WE LIVE AND WORK. WE STRIVE TO APPLY OUR VALUES ACROSS OUR COMMUNITIES TO HELP PROTECT THE ENVIRONMENT AND MAKE POSITIVE CONTRIBUTIONS TO SOCIETY.

37 | Respecting the environment
38 | Contributing within our communities
39 | Engaging with governments and political bodies
40 | Communicating with investors, analysts and the media

THE RIGHT CHOICE

Q: Small local businesses have recently complained about odours coming from our factory site, which is located nearby. We can't smell anything abnormal. Should we ignore their complaints?

A: No. We are obliged to respond to and investigate all neighbourhood complaints. You should identify the site person responsible for environmental management and explain the situation to them. They will investigate in line with our standards and guidance and respond accordingly.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

RESPECTING THE ENVIRONMENT

WE ARE COMMITTED TO INTRODUCING MORE ENVIRONMENTALLY SUSTAINABLE WAYS OF WORKING.

WHY IT'S IMPORTANT

We all have a role to play in reducing our impact on the environment and minimising our contribution to climate change. This helps make the most of limited resources and supports operational efficiencies and cost management.

WE CAN ...make a difference to our future by being responsible in our working environment.

WHAT WE DO

- Follow and implement our environmental guidance and standards
- Favour the use of renewable materials and the development of environmentally friendly packaging, products and ways of working while continuing to meet customer expectations and consumer preferences
- Reduce waste, recycle and re-use where possible
- Conserve water and energy and avoid unnecessary travel
- Report all spills or unusual emissions into the air or water
- Work with our suppliers to improve supply chain impacts.

WHAT WE DON'T DO

- Recklessly dispose of waste
- Ignore or accept any suspected or known violations of our environmental policies and standards.

THE RIGHT CHOICE

Q: I am involved in a local charity which supports terminally ill adults in our community. They have asked for a donation of gifts which can be auctioned at a fundraising event. Can I give the charity some items?

A: Much depends on the size and nature of the request you have received. Your colleagues should be able to help you to establish what normally happens in your market and their experience will allow you to offer reasonable recommendations to your people manager. Your people manager will need to approve the donation. Depending on the value, further approvals may be required. Charitable donations can only be given to registered/officially recognised charities.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

CONTRIBUTING WITHIN OUR COMMUNITIES

WE ARE COMMITTED TO MAKING POSITIVE CONTRIBUTIONS TO THE COMMUNITIES IN WHICH WE OPERATE.

WHY IT'S IMPORTANT

Making a positive contribution within communities is good for employee engagement, business relationships and our company reputation. It's part of our wider role within society. In addition to our economic contributions our charitable activities reflect our values.

I ENGAGE ...by taking an active role in supporting our communities.

WHAT WE DO

- Follow and implement our guidance on community involvement
- Support community projects to improve people's lives
- Encourage and enable our people to volunteer to help our wider communities
- Favour the charitable interests of our people.

WHAT WE DON'T DO

- Work with community projects, charitable activities or organisations that are not officially recognised, registered or governed
- Use community investment or charitable donations for the advertising or promotion of our brands or products
- Support individuals
- Support projects which may result in public criticism either of our business or the charitable organisation, particularly in connection with minors, health, sports, arts and culture
- Pressure others to contribute time, money or resources.

THE RIGHT CHOICE

Q: I have been asked to sponsor a local political party meeting. Doing so will raise our profile and give us the opportunity to engage with political decision makers. Can I proceed?

A: No. Our company is politically neutral and, as employees, we may not favour one political group over another.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

ENGAGING WITH GOVERNMENTS AND POLITICAL BODIES

WE ENGAGE WITH GOVERNMENTS, REGULATORS, INDUSTRY BODIES AND PUBLIC INTEREST GROUPS IN AN OPEN, ETHICAL AND TRANSPARENT MANNER TO SUPPORT THE DELIVERY OF BUSINESS OBJECTIVES.

WHY IT'S IMPORTANT

Engaging with governments, regulators, industry bodies and public interest groups is an important, necessary element of our business and fundamental to the commercial success of Imperial Brands. We have a legitimate role to play in all developments that affect our operations.

I ENGAGE ...in a politically neutral way in all dealings that represent the business.

WHAT WE DO

- Verify that engagement activities are lawful
- Ensure that engagement activities are carried out by trained employees or political consultants who have been formally approved in advance
- Follow company guidance when carrying out engagement activities
- Remain politically neutral in all of our business engagement activities
- Ensure that our personal views and opinions cannot be interpreted as being those of the company
- Support the establishment of employee political action committees or similar organisations, provided that prior approval has been obtained from the Imperial Brands' Board of Directors
- Ensure that we obtain legal input prior to any joint industry engagement with governments/regulators.

WHAT WE DON'T DO

- Pay for access or influence with regulators or special interest groups
- Make donations to political parties or associated individuals
- Represent or claim to act on behalf of the company in any political activity that we are carrying out as a private individual
- Make use of company resources to support private political activity.

THE RIGHT CHOICE

Q: Recently I received an invitation to present as a keynote speaker at an external event and want to talk about Imperial Brands' strategy and financial performance. Do I need to ask anyone first?
A: Yes.You should discuss the invitation with your people manager and ensure that any proposed presentation material is approved by the Investor Relations or Group Communications team before use.

FURTHER INFORMATION | QUESTIONS & ANSWERS | SPEAKING UP

COMMUNICATING WITH INVESTORS, ANALYSTS AND THE MEDIA

WE PRESENT A CONSISTENT MESSAGE IN ALL COMMUNICATIONS WITH INVESTORS, ANALYSTS AND THE MEDIA.

WHY IT'S IMPORTANT

Our reputation depends on our professional and ethical behaviour. Everything we do and say and everything our external stakeholders say about us impacts our reputation.

Shareholders, financial analysts, customers and many others depend on us to provide accurate and reliable information about our operations, performance and financial outlook.

WE CAN

...present a consistent position when representing our company to the public by referring all media, analyst and investor enquiries to the appropriate parties.

WHAT WE DO

- Protect the integrity of the information that we provide by ensuring that we give everyone equal access to relevant and accurate information
- Ensure that only trained and authorised employees speak to investors, analysts and the media
- Refer any media enquiry to our local communications team or Group Communications
- Refer any investor or analyst enquiry to the Investor Relations team in head office.

WHAT WE DON'T DO

- Represent the business externally unless trained and authorised to do so
- Allow any confusion to arise between our personal views and those of the company.