



Annex 1

Tobacco Europe

Member companies' commitments to key international marketing principles

This informative note compiles an extract of Tobacco Europe's member companies' commitments to key international marketing principles

Further details about each company are available on their respective website.

1. British American Tobacco

Responsible Marketing

Tobacco products pose serious health risks, so it's right that their marketing is regulated. But we also believe we should be able to communicate responsibly with adult consumers.

Our International Marketing Principles govern how we market our tobacco products, providing a consistent and responsible approach across the world. They are our minimum standard and we apply them even when they are stricter than local laws.

Central to these principles is our long-held commitment that our marketing is aimed only at adult smokers and is not designed to appeal to youth.

https://www.bat.com/groupms/sites/APP_9T2GMU.nsf/vwPagesWebLive/DO9TFJ8B

Our actions impact our consumers and communities, from marketing responsibly to contributing to local economies through tax payments.

Responsible marketing practices are crucial for ensuring adult-only consumers use our tobacco and nicotine products and that they do not appeal to youth. We have strict marketing requirements, and support our employees, partners and customers in effectively applying them. We aim to have 100% adherence to our International Marketing Principles (IMP), and our Youth Access Prevention (YAP) Guidelines.

https://www.bat.com/group/sites/UK_9D9KCY.nsf/vwPagesWebLive/DOBMZH7U

We are committed to aiming for 100% compliance with our global International Marketing Principles worldwide, as well as ensuring all our product marketing complies with local legislation.

https://www.bat.com/group/sites/UK_9UANCV.nsf/vwPagesWebLive/DO9URLV8

A fundamental requirement of our marketing principles is that our marketing is aimed only at adult consumers and is not designed to engage or appeal to children.

<https://www.bat.com/imp#>

2. Imperial Brands

International Marketing Standards for Combustibles and NGPs Marketing principles

As we operate in a highly regulated and political environment, we are committed to apply International Marketing Standards (**IMS**) to consumer advertising / promotional materials and activities for our products. Our IMS set out the minimum requirements to which we should be operating and take precedence except where local law or voluntary agreements demand a

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higher standard. All our Group Companies, employees and anyone working on our behalf (including all advertising, promotion, research agencies and any other organisations engaged in consumer marketing for our Products) shall adopt in good faith this IMS.

The IMS demonstrate our responsible approach to consumer marketing and Youth Access Prevention (**YAP**) in our Combustible and NGP markets. Advertising for our products is only ever directed towards adult consumer of tobacco or recreational nicotine products. At Imperial Brands, we do not want youths to access or use any of our products and we fully support YAP and minimum age restrictions for the lawful sale or purchase of our products.

Our commitment to responsible marketing and sale of our NGPs and Combustible tobacco products is summarized in our five Marketing Principles:

- We only engage with adult consumers of tobacco and recreational nicotine products.
- Our marketing is honest and transparent.
- We give consumers clear and accurate information about our Products to enable adult consumers make informed choices.
- We will never encourage people to start smoking or non-smokers to use recreational nicotine products, and never discourage consumers of our products from quitting.
- We respect the local laws, codes of practices and voluntary agreements which govern the advertising, promotion and sale of our products.

3. Japan Tobacco International

Tobacco products carry risks to health. These risks distinguish tobacco from most consumer goods, and they place upon the industry a real responsibility. It's a responsibility for which JTI expects to be held accountable, together with governments and the rest of society.

JTI therefore supports the implementation of practical, effective and proportionate regulation which governs the marketing of tobacco products, while preserving JTI's right to communicate with adults who use those products.

However, whatever the level of regulation that applies to its marketing activities, JTI is committed to its five Global Marketing Principles to ensure there is a responsible and consistent approach to how it markets its combustible tobacco products and its Reduced-Risk Products to existing adult consumers of these products. All JTI marketing activities are based on the JT Group's five Global Marketing Principles, which are set out below.

1. We only market our products to existing adult consumers of combustible tobacco products and RRP.
2. We market our products honestly and using accurate information.
3. All existing adult consumers of combustible tobacco products should be reminded about the health risks associated with these products.
4. All existing adult consumers of our RRP should be informed that they have the potential to reduce the risks associated with smoking, though they are not risk free.
5. We comply with all laws and regulations.

JTI applies these Global Marketing Principles when applicable laws and regulations are less strict, do not deal with the particular issue, or do not exist.

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Some examples of how we apply these principles in practice are set out below.

ADVERTISING AND PROMOTION

JTI advertising and promotion in any medium or advertising channel is directed only toward existing adult users of tobacco products. For example, JTI does not:

- Use imagery or fonts which appeal to minors, feature or mention celebrities, or depict anyone who is under 25 years old, appears to be under 25 years old, or is presented as being under 25 years old;
- Imply that smoking contributes to sporting or athletic success, sexual success or to social or professional success;
- In principle, advertise its tobacco products and tobacco brands on television, radio or in cinemas;
- Advertise in printed publications distributed to the general public unless there is reliable, third-party data establishing that at least 75% of the publication's readers are adult and the number of minors who read it constitutes less than 10% of all minors in the country of circulation;
- Permit, pay to or accept payment from third parties for the placement of products, advertisements, or branded objects in any mass medium entertainment produced by a third party and intended for the public such as motion pictures, television programs, theatrical productions, live or recorded music, video games, or internet postings, such as videos and blogs;
- Contribute to or sponsor events or activities to promote a brand to consumers unless the event has no particular appeal to minors and at least 75% of the attendees or audience is adult;
- Place advertisements, brand names, brand logos, or brand elements on objects particularly marketed to or used by minors, including without limitation toys and clothing in child sizes.

JTI denies minors access to advertising and promotional material in advertising channels or media wherever it is possible to do so. JTI excludes minors and non-users of tobacco products from participation in promotional offers and programs wherever this is permitted by law.

JTI only sends direct mail, email and text messaging and only grants access to advertising and promotion content on dedicated JTI brand or other publicly accessible websites to consumers who:

- Provide information which allows JTI to verify that they are adults who live in the market targeted by the website, direct mail, email or text message;
- Are current users of tobacco products;
- Agree to the terms and conditions set out by JTI before access to the website is granted, or agree to receive branded direct mail, email or text messages from JTI.

JTI provides verified adult consumers of tobacco products with an option to decline further access at any time and respects their choice. Similarly, they have the option of declining further receipt of branded direct mail, email or text messages. JTI also excludes minors and non-users of tobacco products when it may legally do so.