

COMBUSTIBLE TOBACCO PRODUCTS
AND ACCESSORIES

INTERNATIONAL MARKETING STANDARD



> OUR COMBUSTIBLE TOBACCO PRODUCTS INTERNATIONAL MARKETING STANDARD

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> IMPERIAL BRANDS PLC INTERNATIONAL MARKETING STANDARD COMBUSTIBLE TOBACCO PRODUCTS AND ACCESSORIES

We at **IMPERIAL BRANDS PLC** believe that our Products are for Adults and we communicate in a responsible manner with consumers about our Products.

We believe in:

- offering Adult consumers a broad range of **Combustible Tobacco Products and Accessories** to meet their preferences;
- providing Adult consumers with the information necessary to make informed choices.

We are committed to the marketing and advertising of our Products responsibly:

- within the laws, codes of practice and voluntary agreements of those countries within which we operate; and
- to meet the preferences of Adult consumers.

We fully support Youth access prevention and minimum age restrictions for the lawful sale or purchase of our Products.

We apply this **Combustibles Tobacco Products and Accessories International Marketing Standard (IMS)** to consumer advertising/promotional materials and activities. This IMS replaces the Imperial Tobacco Group International Marketing Standard. In accordance with our Responsible Advertising and Marketing commitment set out in our Code of Conduct, this IMS:

- shall apply to consumer advertising/promotional materials and activities for our Products across our Group Companies; and
- underpins our commitment to market and advertise our Products to Adult consumers responsibly across our Group Companies.

We shall continue to:

- observe local laws, codes of practice and voluntary agreements which govern the advertisement and promotion of tobacco products ('Legal Requirements'). In markets where the Legal

Requirements are less stringent than this IMS, we shall apply the standards set out in this IMS;

- illustrate and describe our Products in a fair and honest way that will not mislead Adult consumers; and
- ensure all claims we make are true and can be substantiated.

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.

This IMS is approved and endorsed by the Imperial Brands Plc Executive Committee on 24 November 2020.

> OUR COMMITMENT

ADULTS ONLY

We shall:

- only market our Products in consumer advertising/promotional materials and activities which are aimed at Adult consumers.
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RESPECTING CONSUMER CHOICE

We will not:

- encourage anyone to become a consumer of Combustible Tobacco Products; or
- discourage existing consumers from ceasing consumption, if they so choose.

We believe in:

- offering Adult consumers a broad range of Products to meet their preferences; and
 - providing Adult consumers with the information necessary to make informed choices.
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RESPONSIBLE CONSUMER MARKETING

We:

- shall illustrate and describe our Products in a fair and honest way that will not mislead our Adult consumers;
- do not make claims that consumption of Combustible Tobacco Products is “safe”; and
- commit to marketing our Products responsibly.

> DEFINITIONS

ACCESSORIES

Items used for the consumption of Combustible Tobacco Products, for example rolling papers, filters or tubes.

ADULT

A person aged 18 years or over, unless a higher minimum age for the lawful sale, purchase, possession or consumption of tobacco products is specified by local law or voluntary agreement. If a higher minimum age is specified, the term "adult" means a person of at least that specified minimum age.

ADVERTISEMENT / ADVERTISING

Any consumer advertising/promotional materials, activities and events which are aimed at encouraging Adult consumers to select one brand over another. For the avoidance of doubt, the following are excluded from this definition:

- communications between our Group Companies and the relevant trade (trade communications);
- images of Products, brands, packaging or advertising (a) in corporate communications (such as Annual Reports and Accounts) and/or (b) for purposes of historical interests;
- our Group Companies corporate websites intended to communicate company information rather than to promote Products;
- user generated content including texts, messages, pictures, social media, and videos that has been independently created by an online user, such content being placed on an internet site outside of the control of us or our Group Companies;
- Product packaging;
- Product branding on a price list or other similar form of communication designed to convey pricing information to consumers.

AGE VERIFICATION MECHANISM

Any verification mechanism which confirms that a consumer is an Adult.

COMBUSTIBLE TOBACCO PRODUCT

Tobacco products that consist wholly or partially of parts of a tobacco plant and that can be consumed involving a combustion process.

DIGITAL MARKETING

The promoting of brands or products and services via a digital medium using technologies / electronic devices such as computers, tablets, smartphones, cellphones, digital billboards, and gaming consoles.

GROUP COMPANY / COMPANIES

Where we have a controlling interest, for example, where we have more than 50% of (a) the shares and/or (b) voting rights.

LEGAL REQUIREMENTS

Local laws, local / national countries' codes of practice and / or voluntary agreements governing our Products.

PRODUCTS

Combustible Tobacco Products and Accessories.

PROMOTIONAL EVENTS & ACTIVITIES

Ranges of events and activities undertaken by our Group Companies which are created specifically to raise awareness of a particular brand or brands of Products amongst Adult consumers, and which would not take place without the support of our Group Companies.

These do not include:

- pre-arranged events for which the organisers subsequently sought our Group companies' support and whose continued success does not depend solely on our Group Companies as long as no Product brand promotion takes place; or corporate events and activities where no tobacco brand promotion is intended.

SPONSORSHIP

An event, activity or team to whom our Group Companies provide support in order to raise awareness of a particular Product brand or brands amongst Adult consumers, but without which support the event, activity or team would still exist or take place.

YOUTH

Anyone who is not an Adult.

> ADULTS ONLY

We shall:

- only market our Products in consumer advertising/promotional materials and activities which are aimed at Adult consumers.

Adult consumers should be given the opportunity to make informed decisions regarding their purchase and use of our Products.

Our Products' brand advertising (and its content) will:

- only be aimed at Adults;
- only feature a celebrity or contain a celebrity endorsement where that celebrity is believed to appeal more to Adults (taking the population as a whole); and
- only feature persons who are, and clearly appear to be aged **25 years** or over.

PRINT

We will only place Products' brand advertising in printed media where we have satisfactory evidence that at least 75% of the readers are Adults.

OUTDOOR ADVERTISING

We will not place any Products' brand advertising on outdoor signs or billboards positioned closer than 100 meters to the main entrance of schools. This does not include outdoor signs at a point of sale or Adult educational establishments.

RADIO, TELEVISION AND CINEMA ADVERTISING

Where our Products' brand advertising is permitted:

- on radio or television, such advertisements will only be broadcasted during those hours and when the programming is directed at Adults (so as to minimise exposure to youth); and
- in cinemas, it will only be shown when the audience is likely to comprise a majority of Adults.

COMPUTER GAMES AND MEDIA THAT CAN STORE DIGITAL DATA

We will not include Products' brand advertising in material published in mediums that can store digital data such as CDs, DVDs, computer games or any other similar medium unless satisfactory measures are in place to ensure that the item is intended only to be provided to Adults.

ADULTS ONLY (continued)

DIGITAL MARKETING AND INTERNET ADVERTISING

Internet Sites
(managed by or on behalf of a Group Company)

We will only place Products' brand advertising on internet sites if:

- access to the internet site and any downloadable content is restricted to Adults and pre-site access Adult Verification Mechanisms are in place; and
- the pre-site access Adult Verification Mechanism and process for an internet site is completed before any branded content is shared.

Internet/digital advertisements

We will only place Products' brand advertising where we:

- have satisfactory evidence that at least **75%** of the users are Adults; and
- are clearly identified (including where any advertising, promotion, research agencies or any other organisations engaged in the marketing and sale of our Products act on our behalf).

Mobile Smartphone Applications
(managed by or on behalf of a Group Company)

We will ensure any technologies which allow users to access Products' brand advertising internet sites via 'shortcuts' using smartphones:

- will only be accessible by users who are Adults and pre-site access Adult Verification Mechanism are in place; and
- the pre-site access Adult Verification Mechanism and process via the mobile phone application for an internet site is completed before any branded content is accessed.

Viral Marketing

We will not engage in any viral marketing in openly accessible on-line or other digital networks where it is impossible to control the integrity of the message or the recipients it might reach.

ADULTS ONLY (continued)

SOCIAL MEDIA

We will only carry out social media activities:

- in a responsible manner;
- in accordance with our [Code of Conduct](#);
- where such activities are permitted under local Legal Requirements;
- where we are clearly identified (including where any advertising, promotion, research agencies, social media influencers or any other organisations are engaged on our behalf); and
- with social media influencers where 75% of the social media influencer's followers are or are likely to be Adults.

PROMOTIONAL EVENTS AND ACTIVITIES

Where Products' brand Promotional Events and Activities are permitted, we will only carry out these activities where they have been designed to appeal to Adults.

In addition, we will:

- only direct the sampling of Products to existing Adult consumers who have given their express and informed consent to receive such samples;
- restrict access to Products' brand Promotional Events and Activities only to Adults;
- only direct Products' brand Promotional Events and Activities to age-verified Adults;
- only employ (whether directly or indirectly) personnel to participate in Products' brand Promotional Events and Activities (including sampling) who are, and clearly appear to be aged 21 years or over;

- only sell or give away Products' brand promotional items bearing Products' brand names or logos to Adult consumers. Products' brand promotional clothing will only be made available in Adult sizes;
- only direct Products' brand promotional offers to Adult consumers. Where such an offer permits an Adult consumer to be accompanied by other persons at an event or activity, those accompanying the Adult consumer must themselves be Adults.

SPONSORSHIP

Where Products' brand Sponsorship activities are permitted, we will only conduct such activities where we have satisfactory evidence that all competitors, team members and active participants are Adults.

We will only provide Products' brand Sponsorship clothing and materials for any event or activity to any team or individual participating in the event or activity where such team or individual appeals to Adults.

DIRECT MAIL

We will not market our Products by direct mail unless we have verified that the recipients are Adult consumers. All reasonable measures will be taken to ensure that only Adult consumers are placed on any direct mailing lists.

PRODUCT MARKET RESEARCH

We will only commission Products' concept, advertising and promotion research amongst Adult consumers.

> RESPECTING CONSUMER CHOICE

We will not:

- encourage anyone to become a consumer of Combustible Tobacco Products; or
- discourage existing consumers from ceasing consumption, if they so choose.

We believe in:

- offering Adult consumers a broad range of Products to meet their preferences; and
- providing Adult consumers with the information necessary to make informed choices.

STYLE AND CONTENT OF PRODUCTS' BRAND ADVERTISING

We believe in offering a portfolio of products which meet Adult consumer preferences. Our consumer advertising/promotional materials (including their content) and activities are aimed at existing Adult consumers to inform them of product and brand options.

However, our consumer advertising/promotional materials (including their content) and activities will not:

- encourage anyone to become a consumer of Combustible Tobacco Products;
- discourage existing consumers of Combustible Tobacco Products from ceasing consumption;
- suggest that the consumption of Combustible Tobacco Products enhances popularity, sporting, professional or sexual success;
- suggest that most people consume Combustible Tobacco Products.

> RESPONSIBLE CONSUMER MARKETING

We:

- shall illustrate and describe our Products in a fair and honest way that will not mislead our Adult consumers;
- do not make claims that consumption of Combustible Tobacco Products is “safe”; and
- commit to marketing our Products responsibly.

CONSUMER MARKETING ACTIVITIES

Our consumer advertising/promotional materials and activities shall comply with all Legal Requirements, our Code of Conduct and our IMS.

We do not:

- make claims that consumption of Combustible Tobacco Products is “safe”.

We shall:

- not suggest that consumption of Combustible Tobacco Products is a healthy activity; and
- ensure that advertising for our Combustible Tobacco Products carry clearly visible (for broadcast mediums such as radio - audible) health warnings.

PRODUCT PLACEMENT

We shall not make any payment (direct or indirectly) for the placement of our Products, brands or advertisements in any film, television programme or any other public performance or entertainment medium for viewing by the general public.

USE OF BRAND NAMES AND LOGOS BY THIRD PARTIES

We will take reasonable steps to prevent third parties from using our Products' trademarks and designs without our authorisation or in a manner contrary to our IMS.

HEALTH WARNINGS

A PRACTICAL GUIDE

Health warnings shall:

- be placed on **Combustible Tobacco Products** and on the following consumer **Combustible Tobacco Products** brand advertising/promotional materials (where permitted):
 - ✓ Printed Publications
 - ✓ In Outdoor Advertising
 - ✓ Point of Sale Materials (>250 square cms and excluding branded items given to consumers)
 - ✓ On Radio, Television and Cinema Advertising
 - ✓ In Digital Marketing and Internet Advertising
 - ✓ In Videos, Audio Recordings, CDs, DVDs and Computer Games
 - ✓ In Direct Mail
- appear in the most appropriate local language;
- be clearly visible (where relevant – audible);
- include an attribution to the legal source of the health warning, if applicable and legally permissible.

COMBUSTIBLE PRODUCTS AND TOBACCO PRODUCTS

Appropriate health warnings, as specified by Legal Requirements, shall be carried on all:

- consumer **Combustible Tobacco Product** brand advertising/promotional materials;
- point of sale materials where the advertising display area exceeds 250 square centimeters (excluding branded items that are given to consumers – where permitted);
- packs of **Combustible Tobacco Products** manufactured and/or marketed by our Group Companies (as well as on any outer packaging intended to be presented to the consumer).

For countries where no Legal Requirements for health warnings are specified, appropriate and commonly used health warnings shall be carried on all:

- consumer **Combustible Tobacco Product** brand advertising/promotional materials; and
- packs of **Combustible Tobacco Products** manufactured and/or marketed by our Group Companies (as well as on any outer packaging intended to be presented to the consumer).

ACCESSORIES

Unless required otherwise by countries' Legal Requirements, we do not place health warnings on Accessories as:

- **Combustible Tobacco Products** already carry health warnings; and
- further health warnings on **Accessories** will not provide the consumer with any additional information.

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