



One Team. **One Conduct.**

Code of Conduct 2026

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Message from CEO JT Group

Under the JT Group’s 4S model, we strive to fulfill our responsibilities to our valued consumers, shareholders, employees and the wider society. This management principle enables us to carefully consider the respective interests of these four key stakeholders, and exceed their expectations whenever we can. The JT Group Purpose “Fulfilling Moments, Enriching Life” further clarifies the best direction for the JT Group to maintain its sustainability.

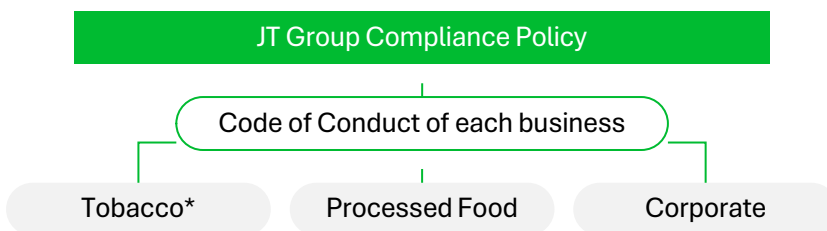
The shared values and ethical conduct defined in the "JT Group Compliance Policy" lay the foundation upon which we can realize the JT Group Purpose and foster sustainable growth over the mid- to long-term in pursuit of the 4S model. This JT Group-wide policy also sets the standards for our business-specific Codes of Conduct which provide sound guidance for our daily behaviors and actions.

Adhering to the prescribed behaviors and actions set out in our Codes of Conduct will not only inspire a high level of trust from consumers and other stakeholders, but also safeguard colleagues, contribute to cultivating employee-friendly workplaces, and foster an open and transparent corporate culture.

We ask that you carefully read the Code of Conduct for your business in order to fully understand and practice our compliance standards. If you are ever unsure whether an action violates or has the risk of violating the Code of Conduct, consult your line manager or contact “Your Voice,” our independent and confidential reporting mechanism.



“I commit to leading efforts to ensure Code of Conduct compliance within the JT Group.”



*Tobacco Business in Japan stipulated and implemented its own Code of Conduct, which provides a uniquely Japanese perspective on the global Tobacco Business Code of Conduct.

Takehiko Tsutsui
CEO JT Group



Welcome from our CEO

Dear colleague,

Since the birth of JTI in 1999, we've been growing in a deeply responsible and respectful way, rooted in our values, guided by our purpose, operating within the framework of our Code of Conduct, and by always doing the right thing.

I often view the Code of Conduct as a compass, pointing me in the right direction if I have a doubt. I urge you to use it in the same way and if you can't find the answers you seek, ask for advice. The reputation and ultimate success of our company depends on each of us performing at our best, all working from the same script.

While we work towards creating a truly diverse company, we must all embrace the same ethical standards and work together to create a workplace built on trust and integrity. The Code supports this expectation by guiding us in how we operate and confirming what it is that makes us different.

In its own way, even if aimed at each of us as individuals, the Code also reinforces our 'One Team' spirit. Any decision can potentially have a significant impact on what everyone has built – we each have an individual responsibility to contribute to our collective success.

I therefore ask you to uphold the standards set out in the JTI Code of Conduct. It's not complicated, many of the messages are just common sense. Use it, as I do, to better understand what our Company is all about and to remind yourself at the end of each working day that you did the right thing.



A handwritten signature in black ink, which appears to read 'Eddy'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Eddy Pirard
President and CEO

Introduction from our Chief Compliance Officer

Dear colleague,

Welcome to the JTI Code of Conduct, our roadmap for navigating ethical dilemmas and ensuring compliance with the high standards of integrity we set ourselves in how we operate and interact with our business partners.

At its heart, the Code outlines our commitments in four key areas: our people, our products, our business integrity and our role in society. It describes what is expected of each of us, regardless of our level in the Company, our role or the market in which we operate. For situations which are unclear, Your Guide can help you work through your decisions and feel more confident about having made the right choices.

Furthermore, I encourage all Line Managers to lead by example and promote ethical behavior within your teams. I expect you to create environments that promote open discussion and in which employees feel comfortable speaking up. It is only through our common commitment to 'doing the right thing' that we will achieve our business goals and get closer to our purpose of creating fulfilling moments for our consumers and creating a better future for the society at large.

Please take the time to carefully review this Code of Conduct so that you understand it, and most importantly, live it every day.



A handwritten signature in black ink that reads "John". The signature is written in a cursive, slightly stylized font.

John Fraser
Senior Vice President / Legal and Regulatory Affairs
and Chief Compliance Officer



About this Code

At JTI, our purpose– ‘Creating fulfilling moments. Creating a better future’ – is at the heart of everything we do. It guides us in our decision-making and keeps us on track with our commitments. Through the passion, integrity and diversity of our people, we create experiences that offer fulfilling moments for our adult consumers while considering the needs of all those around us to create a better future for us all.

We operate with the highest standards of ethical behavior and expect all employees, business partners and every person acting on our behalf worldwide to live up to these standards. Doing so is critical to protecting our employees, upholding our reputation as a responsible company and securing our ongoing business success.

Our Code of Conduct applies to all individuals worldwide in an employment relationship with any JTI entity, as well as external staff, such as temporary personnel, even if not employed directly by JTI. Employees are expected to act in accordance with the Code of Conduct in all matters related to their work.

The standards outlined in our Code are not exhaustive. They do not replace local laws or JTI operating guidelines, policies and procedures. If a standard within our Code differs from applicable laws, the stricter standard will prevail and applicable laws must never be breached.

Failure to comply with the JTI Code of Conduct, our legal obligations or our operating guidelines, policies and procedures may result in disciplinary measures, including termination.

We aspire to do business with partners who share our values and adopt clear commitments to uphold the standards outlined in our Code.

For each section of this Code, references to additional resources are provided, including:



Who to talk to if you have a question or concern.



References to applicable policies and procedures available on JTI Corporate Compliance Portal.



References to other resources available on the JTI intranet or on JTI website.

While local language translations of the Code may be made, the original English version remains the official version.

This version of the Code, effective June 2026, replaces all previously printed and electronic versions. The Code will be periodically reviewed and updated.

Your guide to making ethical decisions

The decisions you make can impact us all.

Each of us plays a key role in upholding JTI's standards and values, ensuring JTI's reputation is protected and that JTI remains a great place to work.

In most of your day-to-day activities, the right decision will be clear to you, based on our values, our Code of Conduct and other company policies and procedures. Your own common sense can also help you to decide what's right.

However, at times, you might face situations where you are unsure what the right thing to do is. In these situations, 'Your Guide' leads you through the decision-making process, allowing you to consider all relevant factors and anticipate the potential consequences of your decision.

'Your Guide' is a simple tool to help you make the right decision for you and for JTI.



If something doesn't feel right...

For example, you're unsure about something that:

- You plan to do
- You were asked to do
- You saw or heard



Ask yourself: is there an issue?

Consider how you would feel:

- If you saw it in the media?
- If people close to you found out?

Then check if it is:

- Legal?
- In line with our Code of Conduct?
- In line with your own values?



Once you feel comfortable

Go ahead



Still concerned or not sure?

Ask for advice from any of the following:

- Your Line Manager
- Your local P&C Business Partner
- Your local Legal Counsel
- A member of the Business Ethics & Global Investigations team

Raising concerns

We have a collective responsibility to promote fairness, integrity and respect in our dealings with each other and our business partners. At JTI, we take all concerns raised seriously and take the necessary measures to resolve them.



To whom should I report my concern?

If you ever have a doubt or a question, you should always ask for guidance. Throughout the Code, the 'Find out more' sections direct you to the specific department that can help you with related questions or provide you with further information.

If you experience or observe something that you believe in good faith might be unlawful, unethical or may be in breach of our Code, policies or procedures, you should speak up.

Whatever issue you are facing, you can talk to your Line Manager or your local P&C Business Partner in confidence. If you do not feel comfortable with these options, you can raise your concern through our independent and confidential reporting channel, 'Your Voice'.

JTI ensures access to Your Voice, either via a secure portal, accessible 24/7 worldwide or via the dedicated email address onebehavior@jti.com.



When should I report a concern?

However you choose to report, you should speak up sooner rather than later. If you wait before doing so, there is a risk that the situation could worsen, impacting yourself, others or JTI. This can also make it more difficult to resolve.

Any act of retaliation against anyone reporting a concern or otherwise participating in the Your Voice process will be treated as a serious disciplinary matter.

Find out more



- ▶ Your Line Manager
- ▶ Your local P&C Business Partner
- ▶ A member of the Business Ethics & Global Investigations team



- ▶ Your Voice Procedure



- ▶ Your Voice on the Corporate Compliance portal
- ▶ Your Voice portal

How does Your Voice work?



Speak up

There are several ways to raise concerns of misconduct through Your Voice. However you get in touch, we will keep your identity confidential in accordance with the Your Voice process, unless you request otherwise, or if it is required by law.

- The Your Voice portal—by recording a concern and submitting it online to the Business Ethics & Global Investigations team or by calling the Your Voice messaging system.
- Onebehavior email address (onebehavior@jti.com)
- Direct communications with the Business Ethics & Global Investigations team (telephone, email or face-to-face)



Review

The Business Ethics & Global Investigations team will review your concern and decide on the most appropriate course of action. If the concern is not in the scope of Your Voice, you will be advised of the next steps.



Investigation

If further investigation is needed, this will be managed impartially and fairly by an investigation lead in line with JTI Your Voice and investigation process. If needed, corrective actions will be recommended to local management. When involved in a formal investigation or similar type of inquiry, employees are expected to cooperate with honesty and integrity, and to comply with the confidentiality requirements.



Resolution

The Reporting Person will be informed of the outcome of the investigation. The Chief Compliance Officer is responsible for all cases.

Your role as a Line Manager

While our Code applies to all employees, as a Line Manager, you have additional responsibilities. We expect you to set a positive example by living the JTI values and inspiring others to always behave ethically and responsibly.

As a Line Manager, you play a key role in raising awareness of our Code with your team members and helping them understand it. It is important that employees reporting to you know what behavior is expected of them and that they receive the appropriate training and guidance to make the right ethical decisions.

We count on you to create a work environment that fosters and enables ethical behavior and where team members feel comfortable speaking up without fear of retaliation. We expect you to treat each concern reported to you seriously, in confidence and to support your team member in resolving the matter in a timely manner. It is important that appropriate corrective measures are implemented if misconduct occurs within your team.

If you feel that you need support dealing with a concern, please get in touch with your local P&C Business Partner. If the concern must be redirected to Compliance, please liaise directly with the Business Ethics & Global Investigations team, through Your Voice or at onebehavior@jti.com.

Moreover, by virtue of your position, you have a greater responsibility to handle or report a suspected breach of the Code of Conduct that you observe, in line with the guidance available in your toolkit.

Your toolkit

You will find below the references to some practical tools to help you promote ethical behavior within your team, which are available on the Corporate Compliance portal.

To promote a culture of integrity

Guidance, tips, and tools to help you enhance engagement within your team and promote a culture of integrity in all day-to-day activities.

To initiate dialogue within your team

A selection of ethical dilemmas to engage your team in discussions about topics in the Code of Conduct.

To handle concerns of potential misconduct

A guidance document outlining the steps and principles to follow if an employee approaches you regarding a concern of misconduct.

Our People

- 12. Treating people equally and with respect
- 14. Ensuring health and safety

Treating people equally and with respect

We embrace everyone as a unique individual, promoting a working environment where everyone can bring their human best and be themselves without risk of discrimination or harassment.



What does this mean for JTI?

Disrespectful behavior, discrimination and harassment are against JTI values. Discrimination occurs when a person or group of people, is treated less favorably than another person or group based on gender, age, race, religion, disability, sexual orientation, marital status, family status, ethnic background, national origin or any other characteristic protected by law. Discrimination has no place at JTI.

JTI does not tolerate harassment, which is defined as any ongoing or repeated behavior that may pressure, intimidate or offend someone and lead to mental, emotional or physical suffering. This includes any physical, sexual, verbal or written harassment.

Abuse of power, which is the improper use of a position of authority to unduly influence others, intimidation and violence are other forms of unacceptable behaviors at JTI.

We are dedicated to removing such behaviors from the workplace. We have a duty to ourselves and to one another to speak up and to act if something is not right.



What does this mean to me as an employee?

I value and respect cultures, opinions and lifestyles that differ from my own. I consider how my behavior might affect others. I avoid offensive, aggressive or intimidating communication. I do not make suggestive sexual propositions or unwelcome physical gestures towards others.

If anyone displays disrespectful behavior or any form of discrimination or harassment in the workplace, I am encouraged to either resolve it by providing feedback or to report it to my Line Manager, my P&C Business Partner or a member of the Business Ethics & Global Investigations team via Your Voice.

As a Line Manager, I embrace diversity and treat colleagues equally and respectfully. I make decisions that are fair and unbiased. I do not tolerate any form of discrimination or harassment and immediately act on concerns shared with me and on unacceptable behaviors within my team.



What does this mean for our business partners?

Our business partners are expected to provide working conditions that treat workers with respect and fairness and ensure that no worker is subjected to any form of discrimination, harassment, violence, abuse of power, or intimidation.

Here are some examples of insensitive or offensive behavior:

- Inappropriate or offensive humor.
- Comments of a sexual nature or disrespectful comments.
- Expressing racist, sexist or homophobic opinions.
- Humiliating an employee or a group of employees, for example by pointing out their mistakes in front of others.
- Marginalizing individuals or groups, for example by unduly excluding them from activities or conversations.
- Verbal abuse, insults and aggressive behavior against certain employees or groups.

For more information



- ▶ Your Line Manager
- ▶ Your P&C Business Partner
- ▶ A member of the Business Ethics & Global Investigations team



- ▶ JT Group Human Rights Policy

Ensuring health and safety

All employees have the right to be protected from work-related injuries and illnesses. We provide a safe working environment and promote a culture that prioritizes health and safety.



What does this mean for JTI?

We strive for zero harm among our employees and to carry out all our business activities safely. This includes managing health and safety risks, building safety competence and fostering a strong safety culture.

Mental health is equally important. We work to create an environment where psychosocial risks are recognized and effectively managed.



What does this mean to me as an employee?

Safety is everyone's responsibility: Each of us must protect ourselves, our colleagues and others impacted by our work.

I follow all applicable health and safety laws, policies and procedures. I take personal responsibility for my own safety and that of others. I report all incidents, without fear of retaliation. I have the right and duty to stop work or refuse unsafe tasks. I never work under the influence of alcohol, illegal drugs or any substance (including medication) that may impair my ability to work safely. These principles apply whether I work on-site, remotely or while travelling.

As a manager, I ensure compliance with legal and JTI requirements. I ensure that employees are properly trained, competent and equipped to work safely. I encourage open dialogue about any safety concerns and take immediate action on any reported incidents or risks.



What does this mean for our business partners?

We expect our business partners to comply with all applicable health and safety laws, provide safe working conditions and effectively manage health and safety risks. They must supply protective equipment as needed, offer regular training, maintain accurate records and support a culture of safety.

What situations could this apply to?

Here are a few examples of situations where action is needed:

- A colleague intends to drive or operate machinery under the influence of alcohol.
- I am asked to perform a task, but I haven't been trained to do it safely.
- I see a damaged electrical cable that could cause injury.
- I'm mentally overwhelmed and unsure if I can work safely.
- A new colleague is unsure about safe equipment use.
- I stop working due to unsafe conditions.

For more information



- Your Line Manager
- The Corporate H&S team
- Your local Health & Safety contact



- Corporate H&S Policy
- On the Road Safety Standards



- Corporate H&S portal

Our products

- 17. [Engaging with business partners](#)
- 19. [Ensuring product and service quality](#)
- 21. [Marketing our products responsibly](#)
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Engaging with business partners

Our business partners are critical to our success. They are carefully selected based on various criteria, including compliance with laws and regulations, business integrity, quality, health and safety, human rights, labor standards and environmental management.



What does this mean for JTI?

Our business partners include our customers, suppliers, growers and any other parties with whom we maintain a commercial relationship.

Suppliers must be willing to comply with JTI's Supplier Standards.

JTI offers fair opportunities for prospective third parties to compete for our business.

The JTI Agricultural Labor Practices ('ALP') program focuses on improving labor practices on the tobacco farms where we source our tobacco. The program covers child labor, workers' rights and workplace health and safety.



What does this mean to me as an employee?

I support JTI's efforts to maintain high standards across our supply chain, by maintaining strong relationships with business partners, built on clear expectations and mutual respect.

Before engaging with a customer or supplier, I am required to ensure the certification process is completed.



What does this mean for our business partners?

We count on our business partners to respect the law and uphold our high standards by promoting ethical and sustainable business practices. All directly contracted growers and third-party leaf merchants supplying tobacco to JTI are encouraged to uphold our Agricultural Labor Practices (ALP).

Agricultural Labor Practices in action

During the growing season, one of our Agronomy Technicians paid regular visits to a contracted grower. On one of his visits, he noticed the grower applying Crop Protection Agents (also called 'CPAs') without wearing the Personal Protective Equipment (PPE) provided by JTI. The Agronomy Technician explained the risks associated with handling CPAs without the correct PPE and invited the grower to join a training session on CPA management in his area, organized with our support. During the next CPA application period, our Agronomy Technician was happy to see the grower wearing the PPE provided.

For more information



- ▶ Your Line Manager
- ▶ Your P&C Business Partner
- ▶ A member of the Compliance team



- ▶ JTI Supplier Standards
- ▶ Know Your Business Partners Policy
- ▶ JTI Agricultural Labor Practices

Ensuring product and service quality

We pride ourselves on our world-class operations, which consistently meet JTI quality standards and consumer expectations.



What does this mean for JTI?

We are committed to providing products and services that meet JTI quality standards and regulatory compliance. Ensuring product quality is a shared responsibility across all levels of the organization and through all stages of the product lifecycle, including product development, sourcing, manufacturing, storage, distribution and consumer/customer services, including consumer care.

We manufacture products in accordance with our stringent specifications using quality tobacco and non-tobacco materials from trusted sources.



What does this mean to me as an employee?

I always follow the JTI Quality Management System containing our internal quality standards, programs and processes, regardless of the impact it may have on deadlines or other resource constraints.

I ensure that any business partners I work with adhere to the same principles.



What does this mean for our business partners?

We expect our business partners to comply with applicable laws, JTI supplier standards, material quality criteria and service agreements.

They are required to make their goods or services accessible for inspection when requested by JTI.

What situations could this apply to?

This applies to any situation where the quality, safety or compliance of our products or services could be affected. Examples include:

- Certain established procedures were bypassed to ensure timely completion.
- A defect or risk in a product, material or process was identified.
- A supplier or third party was engaged without fully meeting JTI expected standards.
- Concerns about product safety, consumer complaints or regulatory risks were reported.

In all such cases, employees are expected to prioritize quality and take appropriate action to prevent or address non-conformities.

For more information



- ▶ A member of the Quality Assurance teams
- ▶ Your Line Manager
- ▶ Your Consumer Service Representative



- ▶ JTI Quality Management System

Marketing our products responsibly

We are committed to marketing our products responsibly to adult smokers.



What does this mean for JTI?

We take this responsibility seriously and fully comply with all relevant regulations and the JTI Global Marketing Principles.

We do not market our products to minors. We also do not encourage anyone to take up smoking and do not try to dissuade smokers from quitting. We market our products to adult smokers in order to maintain brand loyalty and to encourage adult smokers of competitor brands to switch to our products.

We believe that adult smokers should be appropriately informed about the health risks of smoking before they choose to smoke.



What does this mean to me as an employee?

If I am involved in Marketing and Sales (M&S) activities, I am responsible for familiarizing myself with M&S policies, guidelines and procedures, as well as all applicable legal requirements and the JTI Global Marketing Principles. I apply them consistently in my day-to-day activities.



What does this mean for our business partners?

We expect any business partners retained for market research, brand marketing, product promotions or other M&S activities to comply with our M&S policies, guidelines and procedures, as well as any applicable legal requirements and the JTI Global Marketing Principles.

For more information



- ▶ A member of your local Marketing team
- ▶ Your Line Manager
- ▶ A member of the global Corporate Affairs team



- ▶ JTI Global Marketing Procedures

Combatting illegal trade

We lead the industry in combatting illegal tobacco trade through our partnerships with law enforcement agencies and governments, as well as through the development of state-of-the-art technologies.



What does this mean for JTI?

JTI aims to support governments and law enforcement to prevent all forms of illegal trade in tobacco products, including diversion or counterfeiting of JTI brands. The scope includes the illegal manufacture, distribution, import, export, purchase, storage, sale or possession of JTI products in contravention of national or international legislation, JTI's intellectual property rights and JTI's Supply Chain policies and procedures.

Illegal tobacco negatively impacts society, reduces government tax revenues, supports organized crime, undermines legitimate tobacco business and damages industry reputation.

We closely monitor our markets and customers to ensure that JTI tobacco products only reach adult consumers through legal trade channels in their intended destination markets.



What does this mean to me as an employee?

Supporting JTI's efforts to secure a legal tobacco supply chain, I ensure that any business partner I engage with is made aware of the JTI Supplier Standards and relevant JTI policies. Any business partner who purchases or handles our tobacco products must be reputable and vetted through our supplier and customer certification programs.

I will immediately report any suspicious transaction or activity involving a JTI business partner or product to a member of the Anti-Illicit Trade Operations (AITO) or Compliance teams.



What does this mean for our business partners?

We expect all business partners to safeguard JTI's and their own business operations and supply chains against any form of illegal trade. Moreover, we expect full cooperation from our business partners with our supplier and customer certification programs and investigations into the diversion of our trademarks.

Our Anti-Illicit Trade Operations team cooperates with law enforcement and investigates any seizures of JTI products. If an investigation puts any of our business partners' reputations in doubt, we take the appropriate action to secure our supply chain, including terminating business relationships where necessary.

In numbers

- “1 out of 10 cigarettes around the world is illegal, on average” (Source: World Bank and Euromonitor).
- “40-50 bn USD is lost each year in global tax revenue” (Source: World Bank and Euromonitor).

For more information



- ▶ A member of the Anti-Illicit Trade Operations team
- ▶ A member of the Compliance team
- ▶ Your Line Manager
- ▶ Your P&C Business Partner



- ▶ Supply Chain policies and procedures
- ▶ Preventing Financial Crime Procedure



- ▶ Fighting illegal trade video on JTI.com

Our business integrity

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Preventing financial crime

Financial crime harms society and governments. We do not tolerate any form of financial crime and actively manage risks related to it.



What does this mean for JTI?

Financial crime can adversely affect JTI's business and reputation. The penalties for committing or facilitating financial crime can be serious for both JTI and its employees, even if JTI or the person responsible does not benefit from the activities carried out.

Financial crime includes money laundering, tax evasion, the facilitation of tax evasion and terrorist financing.

- Money laundering is the process of converting money obtained illegally into apparently legitimate money or other assets.
- Tax evasion involves taking measures to avoid making required tax payments.
- Facilitation of tax evasion means assisting a business partner or other third party to evade taxes.
- Terrorist financing involves the solicitation, collection or provision of funds with the intention that they may be used to support terrorist acts or organizations.



What does this mean to me as an employee?

I must not engage in or facilitate any form of financial crime. I can refer to the JTI's Preventing Financial Crime (PFC) Procedure, which defines the framework and controls to mitigate the financial crime risks.

If I am asked to carry out an act that could lead to a financial crime, I will refuse to act and immediately report it. I will speak up if I become suspicious that a colleague or business partner might be involved in a financial crime.



What does this mean for our business partners?

We expect our business partners, including those associated with our business partner (such as directors, employees, representatives, subcontractors or persons supplying or acting on behalf of the business partner), not to engage in any activity, practice or conduct that would constitute a financial crime. We will exercise our right to terminate contractual arrangements where business partners are involved in any form of financial crime.

If a business partner is asked to carry out an act that may result in a financial crime, they must immediately report their concern via onebehavior@jti.com.

What situations could this apply to?

Here are some examples of potential financial crime:

- A business partner has asked me to redirect a payment to an offshore bank account registered to a third party which I am not familiar with, and I suspect the reason for this is to evade tax.
- A customer has asked me to wrongly classify the goods/services they purchased on their invoice to reduce the VAT, other taxes or duties that are due.

For more information



- Your local Legal Counsel
- A member of the Compliance team



- Preventing Financial Crime Procedure

Fighting fraud, bribery, and corruption

We have a zero-tolerance approach to fraud, bribery and corruption, and we are committed to acting with integrity in all our business dealings.



What does this mean for JTI?

Breaching fraud, bribery and corruption laws can result in criminal investigation and prosecution, as well as potential financial penalties and reputational damage for JTI and any employees involved.

Fraud is the intentional breach of laws and/or JTI Policies & Procedures or wrongful deception committed to obtaining a personal gain.

Bribery involves giving or receiving something of value (typically money) in return for a business advantage.

Corruption is the abuse of power for personal gain.

Facilitation payments are a form of bribery and typically involve small gifts or payments to public officials in return for carrying out or speeding up a routine service.

Intermediaries are Business Partners appointed or retained by JTI to work with governments, other official bodies or public officials on our behalf.



What does this mean to me as an employee?

I do not engage in fraudulent behavior and do not knowingly assist or facilitate any third party to commit fraud.

I do not participate in any form of fraud, bribery or corruption. In particular, if I am offered to participate in fraudulent behavior or asked for a bribe or facilitation payment, I refuse it and report it immediately to my local Legal Counsel or a member of the Corporate Governance & Compliance team.

We implement controls and processes in order to detect the risk of fraud, bribery and corruption.

I'm also mindful of the possible fraud and bribery risks related to working with intermediaries, gifts, hospitality, entertainment, donations to government bodies, charitable donations and sponsorships.



What does this mean for our business partners?

We expect all our business partners to fully comply with our zero-tolerance position on fraud, bribery and corruption as a condition of doing business with JTI.

JTI may terminate our agreement with any business partner who is found to have been involved in a form of fraud, bribery or corruption.

Living our values in practice

“I received repeated calls and emails from the sales agent of a prospective vendor. I told him the products he proposed did not meet our specifications. He called again, implying that he would be willing to pay me an extra 5% in ‘personal commission’ if JTI accepted his offer. I informed him that such practices are not in line with our values and our Code of Conduct and asked him not to call JTI again. I immediately informed my Line Manager.”

A Procurement employee

For more information



- ▶ Your local or regional Legal Counsel
- ▶ Your Line Manager
- ▶ A member of the Compliance team



- ▶ Know Your Business Partners Policy

Exchanging gifts, hospitality, and entertainment

We do not encourage the exchange of gifts, hospitality and entertainment (GHE), but we acknowledge that appropriate GHEs, made for the right reason, are legitimate and are recognized as part of doing business.



What does this mean for JTI?

Gifts, Hospitality and Entertainment (GHE) are anything of value given or received without payment in return. Hospitality and entertainment include (but are not limited to) events, accommodation, meals and beverages. This also includes GHE exchanged on behalf of JTI by an appointed consultant, agent, intermediary or other business partners.



What does this mean to me as an employee?

I follow the GHE principles. Any GHE exchanged with a government official or organization, regardless of value, requires prior approval.

I do not let the exchange of GHE influence my business decisions.



What does this mean for our business partners?

Business partners must obtain prior approval before offering or accepting any gifts, hospitality and entertainment on behalf of JTI.

According to our GHE principles, GHE must:

- Be in line with applicable legislation and local customs.
- Be appropriate (i.e. reasonable, proportionate and occasional).
- Not create a conflict of interest.
- Not be given or received to obtain an improper advantage or to reward or induce improper performance.
- Not be cash, vouchers or coupons that can be exchanged for cash.
- Be approved, as per Gifts, Hospitality & Entertainment Procedure.

For more information



- Your Line Manager
- A member of the Compliance team



- Gifts, Hospitality & Entertainment Procedure

Avoiding conflicts of interest

We expect employees to avoid any situation where their personal interests might conflict with those of JTI.



What does this mean for JTI?

A conflict of interest arises when business decisions are influenced by personal interests. Conflicts of interest can induce employees to make decisions that are not in the best interest of JTI and might negatively impact the Company's reputation as well as their own.



What does this mean to me as an employee?

I avoid situations where conflicts of interest could arise.

I do not let my personal interests influence any decisions I make on behalf of JTI. I declare any family or personal relationships that might influence my decisions at work.

Outside of work, I do not engage in any activity that could undermine or compete with JTI's business interests.

I also monitor the possible conflicts of interest that might arise when exchanging gifts, hospitality or entertainment.

Where a conflict of interest is unavoidable, I declare it promptly to protect myself and JTI.

As a Line Manager, it is my accountability and responsibility to address any interest declared by a member of my team, with the support of the People & Culture and Compliance teams.



What does this mean for our business partners?

Business partners must avoid any situation that could result in a potential interest.

Any potential conflict of interest with JTI must be reported via onebehavior@jti.com.

What situations could this apply to?

Here are some examples of possible conflicts of interest:

- My brother is applying for a position at JTI, for which I will be part of the decision-making process.
- A supplier is bidding for a contract at JTI, for which I will be part of the approval process, and has offered me an all-expenses paid weekend in a luxury resort hotel.
- To earn some extra income, I signed up to do research outside of my working hours at a start-up working on technological developments for use in the tobacco industry.

For more information



- Your Line Manager
- Your P&C Business Partner
- A member of the Compliance team



- Conflict of Interest Procedure

Preventing insider dealing

Employees must not engage in insider dealing under any circumstances.



What does this mean for JTI?

Insider dealing is the use of inside information for personal gain or to benefit a third party. It can also refer to a recommendation based on inside information. Inside information is any non-public information that, if disclosed, could have a significant effect on the price of a company's securities. Inside information can include confidential financial results, declarations of dividends, issues or buybacks of shares, major expansion plans, and proposed mergers, acquisitions or takeovers.



What does this mean to me as an employee?

I do not buy or sell any securities (e.g. shares, bonds or stock options) while in possession of inside information, nor do I advise others to buy or sell securities. I do not share inside information with a third party unless I am authorized to do so.

If I become aware of a colleague or an employee of a business partner attempting to obtain inside information without providing a reasonable explanation for this request, I report it immediately to the Chief Financial Officer or a member of the Compliance team.

What situations could this apply to?

Here are some situations that may represent a risk of insider dealing:

- A member of the Business Development team would like to buy shares from a potential targeted company.
- An employee from the Finance team has access to financial information of JT that has not been publicly disclosed by JT and would like to sell his/her JT shares.
- My husband wants to buy some JT shares and has asked me about the Group's financial results, which have yet to be announced.

For more information



- ▶ Your Line Manager
- ▶ Your regional Legal Counsel
- ▶ Your local Finance Director
- ▶ A member of the Corporate Governance and Compliance team

Safeguarding company assets

JTI company assets are critical to helping us achieve our business objectives. We treat JTI company assets, and assets belonging to others, responsibly and respectfully. We ensure that our company assets are correctly acquired, maintained, protected and disposed of.



What does this mean for JTI?

Company assets are anything that is owned or paid for by JTI and include machinery and equipment, offices and manufacturing sites, IT devices, products and production materials, company data and intellectual property (IP). IP includes the JTI brand, trademarks, product designs, patented inventions, copyrighted material and trade secrets, including blends and recipes developed, used and owned by JTI.

The misuse, unavailability, disclosure or malfunction of company assets can disrupt our business and may result in financial losses and reputational damage.

Our IP is especially valuable as it helps us to differentiate our products and services and maintain a competitive advantage. The IP Team handles all company IP in line with JTI policies and procedures, to ensure that our IP is handled and protected correctly.



What does this mean to me as an employee?

I have a duty to protect company assets from theft, damage, misuse and waste.

I use JTI company assets in line with JTI policies and procedures and do not use them for personal gain.

I do not disclose or share company IP with a third party without prior authorization.

To handle assets belonging to others responsibly and respectfully, I never improperly obtain or use third-party assets or third-party intellectual property without proper license or approval.

Whenever I consider contracting a supplier to host or store company digital data, I involve the IT team. This allows them to ensure our data is secure.

I understand the value and the vulnerability of JTI's digital data and follow the i-Secure code to minimize the risk of theft or loss.

If I have a doubt about the proper use of an IT resource, I ask the Global Service Desk (GSD) for support. If I make a mistake, I disclose it immediately.

REMEMBER , 'Our Way' for i-Secure means we bring our Human best when we

- Think ahead - Always think before you act.
- Protect what matters - We are intentional about securing our information and systems.
- Challenge everything - We trust our instincts and, if something feels off, we speak up.
- Stay sharp and alert - Awareness is our first line of defense.

For more information



- ▶ Your Line Manager
- ▶ The Global Service Desk (GSD)
- ▶ Your local Legal Counsel
- ▶ A member of the global Intellectual Property team
- ▶ A member of the Corporate Security team



- ▶ Spending Approval Limits Procedure
- ▶ Intellectual Property Policy
- ▶ Acceptable Use of IT Resources Policy
- ▶ Local policies (e.g. on use of mobile phones)



- ▶ i-Secure hub

Respecting data protection & privacy

We ensure we collect, use, share and store personal data lawfully and securely. We apply the same care to JTI other information.



What does this mean for JTI?

Throughout various operations, we collect and handle personal data about JTI, employees, consumers, business partners and others. It's our responsibility to protect this data with care, using safeguards like encryption, access controls and secure systems, and to ensure we only use the data that's necessary to support JTI's business.

We also produce other business-sensitive information about JTI, which calls for the same level of care and protection. Unlawful or unauthorized disclosure of personal data or other information can harm JTI's reputation and negatively impact the business operations.



What does this mean to me as an employee?

I am careful when I work with personal data. I always respect the privacy of the individuals and use their data lawfully.

I am especially careful when I share personal data. I do so only if there is a legitimate business reason. If I am in doubt, I seek guidance from the local or regional Legal Counsel.

I only use secure and approved IT solutions to collect, use, store and share personal data or other information. I keep my devices and documents protected, and I maintain strong and secure passwords for accessing IT systems, websites and other information assets (JTI assets are anything that is owned or paid for by JTI).

I take extra care when working outside of JTI premises to ensure unauthorized people cannot overhear, see or access JTI information (including passwords).

I never respond to suspicious messages requesting any information, and I do not open links or attachments contained in such messages.

I immediately report any suspected data breach (such as loss of confidentiality or misuse of any information) to the Global Service Desk (GSD).

What information does this refer to?

- Personal data is any information relating to an individual, for example: name, address, contact details and identification numbers, as well as details about their health, family, finances or job.
- Other information includes any data related to JTI operations, products, business plans or business partners that, if disclosed, could damage JTI's business operations or reputation.

For more information



- ▶ Your Line Manager
- ▶ Your local or regional Legal Counsel / Data Protection Officer
- ▶ A member of the Corporate Governance & Compliance team
- ▶ A member of the Information Security team



- ▶ Global Data Protection Policy
- ▶ Global Data Breach Procedure

Managing external communications

Engaging with audiences through traditional or social media channels allows us to build our corporate brand and enhance our reputation. However, we need to be mindful of what we can and cannot share.



What does this mean for JTI?

Only JTI senior management, country general managers, a select group of experts and authorized local, regional and global corporate affairs and communications representatives can speak to journalists. All should be media trained at JTI beforehand.



What does this mean to me as an employee?

I am free to share my personal views about life at JTI, our culture, industry trends and achievements on my personal social media accounts, but I do not disclose confidential information and do not promote our products.

I consult the External Communications Guidelines for further guidance and dos and don'ts. If in doubt, I get in touch with a member of the External Communications team at social@jti.com.

Dos and don'ts for social media

- DO share posts and jobs with your personal networks that have been published by JTI corporate channels.
- DO write in a clear and authentic way.
- DO use common sense and think before posting or responding.
- DON'T use JTI's name and/or logo when expressing your personal views.
- DON'T disclose confidential or sensitive information about JTI, our partners and vendors.
- DON'T promote JTI tobacco products or the act of smoking or vaping.

For more information



- ▶ Your Line Manager
- ▶ Your local Corporate Affairs & Communications representative
- ▶ A member of the Corporate Communications team at HQ



- ▶ External Communications Guidelines

Reporting and recording company data

Our business relies on true, fair, timely and accurate record-keeping to support our decision-making, protect our reputation, promote operational efficiency and meet legal and regulatory obligations.



What does this mean for JTI?

Company records are any documents and data created or recorded in the course of our business operations and include financial and operational data, personal and confidential data, records of meetings, business plans, forecasts and analyses.

Business and financial records are essential to our business operations and to our engagement with our shareholders, business partners, governments and other stakeholders.



What does this mean to me as an employee?

I ensure that records are kept confidential, secure and retrievable and respect applicable laws and regulations when maintaining and disposing of them.

If I am involved in company financial reporting or record-keeping, I comply with generally accepted accounting principles and ensure that records are accurate, secure and appropriately documented.

If I have made a reporting error or have failed to report something that could undermine the integrity and reliability of company records, I shall immediately report it to the Finance Director, Corporate Controller or my Line Manager.

What situations could this apply to?

Here are some examples of financial-related reporting concerns:

- Reporting revenues that have not been earned or expenses that have not been incurred.
- Failure to make accruals for expenses incurred in the current reporting year.

For more information



- Your Line Manager
- Your Finance Director
- The Corporate Controller



- Global Tobacco Accounting Manual

Cooperating with government inquiries

We fully cooperate with government inquiries and investigations.



What does this mean for JTI?

From time to time, authorities require information relating to various aspects of our business activities to issue permits and certificates and to ensure that JTI is operating responsibly.

Occasionally, authorities may also conduct unannounced visits, also referred to as 'Dawn Raids'.



What does this mean to me as an employee?

I should always provide honest and accurate information or make such information accessible. During site visits, officials must be accompanied at all times by an employee designated by a legal representative.

If I receive an unannounced request for information or a visit, I follow local Dawn Raid guidelines, and I ensure the local Dawn Raid Coordinator or the local or regional Legal Counsel is immediately informed. The specific role of Dawn Raid Coordinators is outlined in the Dawn Raid guidelines.

What is the role of Dawn Raid Coordinators?

A Dawn Raid can happen at any time. Dawn Raid Coordinators are the main points of contact in such situations. This includes being prepared at all times for such visits and making sure anyone else who may be involved—receptionists, members of IT, other members of the Dawn Raid team or employees in general—has the information they need and is prepared.

For more information



- Your local Dawn Raid Coordinator
- Your local or regional Legal Counsel



- Local Dawn Raid guidelines

Respecting sanctions and export controls

We are committed to complying with applicable sanctions and export controls.



What does this mean for JTI?

Sanctions and export controls may restrict or prohibit business dealings with specified individuals, entities or countries. They can also restrict or prohibit the export or import of certain goods, technology or services. The penalties for non-compliance with sanctions and export controls, even if unintentional, can be severe for both JTI and its employees.

We have policies, processes and training in place to help ensure none of our businesses or employees engage in a prohibited transaction.



What does this mean to me as an employee?

I am responsible for familiarizing myself with and complying with the Sanctions and Export Controls Policy, related procedures and legal guidance documents, and for respecting all sanctions and export controls applicable to me and/or to the JTI entity that I work for.

For business transactions involving embargoed and high-risk countries, products or services, I seek prior written approval from the relevant approver, including the Sanctions & Export Controls team.

If I have a concern about a possible sanction or export control risk, I notify the local Legal Counsel or the Sanctions & Export Controls team immediately.



What does this mean for our business partners?

We expect our business partners to comply with all applicable sanctions and export controls and with the JTI Supplier Standards.

What situations could this apply to?

Here are some examples of potential sanction violations:

- As a US citizen or green card holder, I am an approver for a project related to a country under US embargo.
- A payment to a supplier delivering goods to a country under US embargo is being made in US dollars.
- A machine laser is being shipped to a JTI factory, however the laser can be used for both civilian or military purposes, and an export license was not obtained.
- I am engaging with a vendor that is under EU or OFAC sanctions.

For more information



- ▶ Your Line Manager
- ▶ The Sanctions Officer and the Sanctions & Export Controls team
- ▶ Your Associate General Counsel, functional or local Legal Counsel



- ▶ Sanctions and Export Controls Policy and related procedures

Our role in society

- 48. Respecting human rights
- 50. Ensuring fair competition
- 52. Remaining politically neutral
- 54. Protecting the environment
- 56. Investing in communities

Respecting human rights

Throughout our business operations, we commit to respecting the human rights of our employees, business partners and their workers, leaf growers and the communities where we operate.



What does this mean for JTI?

Human rights are universal norms that apply equally to every person, irrespective of where they are in the world, covering such topics as equal opportunities, labor standards, freedom of speech and association, and privacy.

We provide all employees with clear information on human rights. We conduct human rights due diligence to identify, assess and remedy actual and potential human rights risks in our operations.

To mitigate risks and impacts related to significant human rights considerations across JTI operations, we continuously improve our strategy to ensure our due diligence measures are effective. In addition, we collaborate with non-governmental organizations and business partners to improve situations where human rights may be at risk.



What does this mean to me as an employee?

I can expect JTI to respect my human rights and the human rights of individuals or groups that are affected by JTI's activities.

If I am concerned that my human rights or those of my colleagues may be negatively impacted or limited, I feel empowered to speak up. If I am a Line Manager, I have a duty to ensure that the rights of employees in my team are respected. I handle any concern shared by an employee in line with the Guidelines for Line Managers.



What does this mean for our business partners?

All business partners are expected to adopt and maintain standards of labor practices and working conditions that comply with all applicable local laws and international conventions.

What situations could this apply to?

Here are some examples of situations that may lead to concern:

- While on a tobacco farm, I noticed a child carrying a heavy tobacco load.
- An independent NGO claims that laborers working for a leaf grower were working without any personal protective equipment.
- I heard that a colleague was asked to work on weekends without P&C being informed.

For more information



- ▶ Your Line Manager
- ▶ Your P&C Business Partner



- ▶ JT Group Human Rights Policy
- ▶ JTI Supplier Standards
- ▶ JTI Agricultural Labor Practices



- ▶ Respecting and safeguarding Human Rights across our operation at JTI.com

Ensuring fair competition

We firmly believe that free and fair competition benefits JTI, our customers and our consumers.



What does this mean for JTI?

We are committed to competing fairly in all markets and in full compliance with competition laws. In JTI, we comply with our Competition Law Policy.



What does this mean to me as an employee?

I have a responsibility to know the rules of fair competition and be aware of the limits they set. I understand and comply with the JTI Competition Law Policy at all times.

In particular, in all activities, I determine JTI's commercial strategies and make decisions independently from our competitors and in the interest of JTI alone without consultation or concertation with competitors, or access to competitors' Competitively Sensitive Information.

I understand that Competitively Sensitive Information is: (i) non-public information (ii) on which companies compete with each other (iii) which can be traced back to individual companies and (iv) that relate to current or intended market behavior, the sharing of which would harm effective and fair competition in the market.

I do not enter into agreements that have, as their aim or effect, the prevention, restriction or distortion of competition.

I do not prevent customers from remaining free to make their own business decisions on how they deal with their customers and how they behave and compete in the market.

I protect Competitively Sensitive Information belonging to JTI and do not share it directly or indirectly with competitors. I do not accept Competitively Sensitive Information relating to competitors directly from competitors or indirectly from any source.

I do not communicate Competitively Sensitive Information belonging to a trade customer with other trade customers.

I always keep clear written records of contacts and meetings with competitors, trade associations and industry bodies by preparing agendas and accurate meeting minutes.

I consult a member of the Legal team orally and immediately if I suspect any incidence of anti-competitive activity in my business area, or if I have any questions about competition laws and how they relate to my work.



What does this mean for our business partners?

Business partners, including customers, consultants and data vendors, are responsible for understanding and complying with applicable competition laws and maintaining the confidentiality and security of JTI Competitively Sensitive Information. They should be clear that JTI does not seek or accept Competitively Sensitive Information of our competitors.

We do not communicate Competitively Sensitive Information belonging to a trade customer with other trade customers. JTI will not enter into agreements or participate in concerted practices that have, as their aim or effect, the prevention, restriction or distortion of competition.

Remember:

- Apply the same care to face-to-face conversations, emails and text messages as to a letter or a memorandum.
- Treat trade association meetings in the same way as a meeting with a competitor.
- Keep an accurate record of what was discussed during meetings with competitors, trade associations or industry bodies.

For more information



- Your Line Manager
- Your local or regional Legal Counsel



- JTI Competition Law Policy
- JTI Competition Law Guidelines

Remaining politically neutral

It is in our best interest to remain politically neutral.



What does this mean for JTI?

We do not apply or attempt to apply improper influence on government agencies, representatives or legislators to produce a favorable outcome for JTI. JTI does not make financial contributions to political parties or electoral campaigns.

We respect the right of our employees to play an active part in political processes, provided their involvement is personal and not associated with JTI.



What does this mean to me as an employee?

My political affiliations are personal and unrelated to my work at JTI. I conduct any political activities in my own time and without the use of JTI resources, email addresses or other company references.

I do not use the workplace to promote political campaigns, canvass support from colleagues or seek financial contributions to my political activity.

If I intend to hold a position in public office, I inform my manager as well as my local or regional Legal Counsel.

What situations could this apply to?

Here are some examples of issues involving political activities:

- I want to host a rally led by a parliamentary candidate on JTI premises.
- I actively participate in local politics outside of work and would like to run for election as a local councilor.
- A colleague is using his JTI branded vehicle to participate in political rallies.

For more information



- Your Line Manager
- A member of the International Affairs team
- Your local or regional Legal Counsel
- A member of your local Corporate Affairs and Communications team

Protecting the environment

Our business relies on a sustainable supply chain, which includes a large agricultural element. We are committed to minimizing environmental impacts of our operations, products and packaging, and to conserving resources for future generations.



What does this mean for JTI?

We actively manage our environmental risks and opportunities and commit to continuous improvement and transparent disclosure of our performance.

Our business and our supply chain are exposed to the threat of climate change, natural resource depletion, water scarcity and disruption to vital ecosystem services.

We are committed to reducing our energy consumption and CO2 emissions through efficiency programs and investment in renewable energy for our operations and to working with our suppliers to reduce emissions associated with our value chain. We also focus on reducing our water consumption, improving our water stewardship, minimizing waste from our operations and eliminating factory waste to landfill. This includes investing in training, awareness and performance improvement programs.

Through focused investment and innovation, we are striving to support a more circular economy across our products. We embrace circular design to reduce waste and use resources more efficiently. By designing products for longevity, enabling easy recycling and choosing sustainable materials, we are transforming our global circular economy ambition into action. Moving beyond the 'take-make-waste' model, our circularity framework focuses on extending product life and creating meaningful, sustainable change.

We assess environmental risks across our value chain and adopt an integrated approach to mitigating those risks through our procurement processes and by collaborating with our suppliers, leaf growers and other stakeholders.

We assess and address our impacts and dependencies on nature, including no deforestation, no conversion and biodiversity improvement.



What does this mean to me as an employee?

I aim to reduce my impact on the energy, water and materials used in the course of my work. I seek to reduce the greenhouse gas emissions and waste that I generate and to avoid negatively impacting nature. I consider the environment when making business decisions. If I am unsure of the environmental consequences of a decision, I speak to my local representative responsible for environmental matters.

As a Line Manager, I have a duty to promote environmentally responsible behavior within my team and to ensure that relevant environmental procedures are followed. I actively engage in programs aimed at improving our environmental performance.



What does this mean for our business partners?

Our business partners are expected to have adequate management systems and controls in place to effectively mitigate environmental risks and reduce their environmental footprint. We encourage business partners to work with us to identify and address environmental challenges across our value chain.

How can I extend my contribution?

- Identify and suggest potential reduction opportunities, e.g. emissions, resources, materials and waste.
- Use energy and water responsibly and turn them off when not required.
- Get involved in local environmental programs.
- Submit implemented environmental projects to JTI's annual Sustainability Awards.

For more information



- Your Line Manager
- Your local environmental representative
- A member of the GSC OPI Sustainability Team
- JTI Environment Director



- JTI Environment Policy
- JTI Environment Policy Standard



- Sustainability Hub
- Sustainability section at JTI.com

Investing in communities

We make a positive contribution to the communities in which we operate.



What does this mean for JTI?

We invest in social, cultural and environmental programs with carefully selected charitable organizations that improve social inclusion.

We do not support individuals, profit-making organizations or organizations that discriminate based on gender, age, race, religion, disability, sexual orientation, marital status, family status, ethnic background, national origin or any other characteristic protected by law.

JTI consumer brands must never be associated with community investment programs.



What does this mean to me as an employee?

If I am involved in the selection of community investment partners or programs, I follow the procedures set out in the JTI Community Investment Policy.

How can I extend my contribution?

- Get in touch with your community investment coordinator to find out about community investment initiatives in your area and how you can get involved.

For more information



- [Global Community Investment Function](#)



- [Community Investment Policy](#)
- [Community Investment Operating Procedure](#)
- [Community Investment Handbook](#)



- [Our Company at JTI.com](#)