

MODERN SLAVERY AND HUMAN TRAFFICKING

STATEMENT 2024



IMPERIAL
BRANDS

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024



For more information
on our ESG strategy and
detailed approach to
human rights, please visit:
[www.imperialbrandsplc.com/
healthier-futures/
our-esg-strategy](http://www.imperialbrandsplc.com/healthier-futures/our-esg-strategy)

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This statement satisfies the requirements for those companies [in the Imperial Brands Group] which are in scope of Part 6, section 54 of the Modern Slavery Act 2015. This statement also sets out the steps taken by Imperial Brands PLC and its subsidiaries during the financial year ending 30 September 2024 to understand potential modern slavery risks related to our business and supply chains and describes measures taken to address these risks.

This is the ninth statement we have produced; previous statements can be accessed on our corporate [website](#).

OUR COMMITMENT

MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

As an international business, we recognise the importance, influence, and duty we have in promoting regard for human rights. Our policy is to respect and support the dignity, wellbeing and human rights of our employees, the workers in our supply chain and the communities in which we operate. We are committed to conducting our business in a responsible and sustainable way, seeking to mitigate the potential risk of human rights abuses both within our direct operations and supply chain.

As defined by the UK Government's modern slavery strategy¹, modern slavery encompasses slavery, servitude, forced or compulsory labour, and human trafficking.

Like all businesses, we run the risk of being exposed to modern slavery either within our direct operations or indirectly through our supply chain. We recognise that managing this risk is a multi-stakeholder issue, one which requires engagement with our employees, business partners, suppliers and other key stakeholders associated with our business, including customers and non-governmental organisations (NGOs).

Our commitment to human rights, including modern slavery and forced labour, extends through several Group policies, including our Code of Conduct, Supplier Code of Conduct, and the Human Rights, Speaking Up and Group Health, Safety and Wellbeing policies. These documents set out the foundations for our approach to human rights, which all our employees, business partners and suppliers are expected to adhere to.

The governance framework of our ESG (environmental, social and governance) programme includes the Board's People, Governance & Sustainability Committee, which receives direct reports from the Group ESG and the Group Ethics & Compliance Committees chaired by me as Chief Executive.

Human rights, which includes modern slavery, is one of our eight ESG priorities. Read about the other priority areas, here: <https://www.imperialbrandsplc.com/healthier-futures/our-esg-strategy>.

Our ESG strategy sets clear aims for each of our ESG topics and is aligned with the United Nations (UN) Sustainable Development Goals (SDGs), which aim to have a transformational impact on the world by 2030. Our performance against our ESG strategy is detailed within the Annual Report and Accounts, our corporate website,

and our ESG Performance Summary.

In 2024, our focus was on strengthening our human rights due diligence framework and embedding human rights awareness across the business. As part of our modern slavery commitments, we targeted to conduct three in-person modern slavery audits but we successfully completed five, in the Ivory Coast, the US, and Morocco. We selected these locations using a combination of international data and local knowledge from our own operations. Additionally, we piloted "lighter-touch" modern slavery online audits in Burkina Faso, Madagascar, Puerto Rico, Taiwan, and the US. We reframed our modern slavery leading indicators as human rights leading indicators (HRLI) and enhanced their descriptions with additional guidance and examples.

To further embed human rights awareness, we conducted 19 human rights webinars for our business, engaging over 940 employees across the organisation, and made the human rights digital learning module mandatory for those with a management role and all employees in English-speaking countries. At the time of drafting this statement, over 3,950 employees had completed the training.

We launched a refreshed Group Code of Conduct in financial year 24. Integral to this new Code is the message that our people should feel free to speak up about any concern they may have relating to compliance or ethics matters, anonymously if necessary, and without fear of retaliation. There is also new coverage of diversity, equity and inclusion, and the introduction of a dedicated section on integrity in science.

We rolled out our updated Supplier Code of Conduct to current and new suppliers and implemented our Third-Party Risk Framework to continue increasing our impact in the areas of human rights and the environment. The 'Leaf Partnership' programme supported over 128,000 new beneficiaries in priority countries across Africa, Asia, the Americas, and Europe, aiming to support our suppliers in their work to address the root causes of human rights risks.

We are committed to raising awareness and improving processes in our business and supply chains, and our progress against this commitment is detailed throughout this statement.

This statement has been published in accordance with Part 6, section 54 of the UK Modern Slavery Act 2015 and covers the full financial year 1 October 2023 – 30 September 2024. The statement was approved by the Board of Directors on 20 March 2025 and is signed on its behalf by:



Stefan Bomhard
Chief Executive Officer Imperial Brands PLC



¹ <https://www.gov.uk/government/publications/modern-slavery-strategy>

OUR BUSINESS AND SUPPLY CHAINS

We recognise that, along with our direct operations, our supply chain has the potential for human rights abuses. We are committed to working with our employees, suppliers and business partners to improve supply chain standards.



OUR BUSINESS AND SUPPLY CHAINS

OUR BUSINESS

As we enter the final year of our current strategy, we have strengthened the Company and delivered a more consistent financial performance.

Imperial Brands has become a more effective challenger business through new consumer capabilities, agile ways of working, and a high-performance culture.

This ongoing transformation is driving improvements in operational and financial outcomes, and growing capital returns.

Our commitment to ESG issues is a core element of our business strategy and aligns to our purpose and vision.

Our ESG strategy and ESG priorities, including modern slavery, continue to underpin our commercial strategy.

We are committed to fulfilling our ESG responsibilities by maintaining a strong framework that emphasises high standards of corporate governance, transparency and ethics. We are committed to continuously reviewing and enhancing our risk management processes and disclosure practices to align with evolving standards and best practices.

What we do

Tobacco products

Our core business is the manufacture and sale of a portfolio of tobacco products and smoking accessories that are available in around 120 markets worldwide. Our iconic stable of international cigarette brands such as Davidoff, West, Gauloises and JPS, are complemented by a range of 'local jewel' brands to meet consumer needs and preferences.



Next generation products (NGP)

In line with our purpose, to forge a healthier future for moments of relaxation and pleasure, we are also developing a sustainable range of smoke-free products with the potential to offer adult smokers potentially less risky alternatives. We are present in all three NGP categories – through our vaping brand blu, our heated technology platform Pulze and our modern oral nicotine offerings, which include Zone in the US.

Where we operate

Americas

Our primary Americas market is the US, where our ITG Brands subsidiary operates a range of brands including Winston, Kool and Maverick.

Europe

We offer a comprehensive range of tobacco and NGP across our Europe region, where our largest markets are Germany, Spain and the UK.

Africa, Asia, Australia and Central & Eastern Europe

Our AAACE region comprises a diverse set of markets including Australia, Poland, Morocco, Saudi Arabia and Taiwan.

Distribution

We also hold a stake in the distribution business Logista, a public company listed on the Bolsa de Madrid, which is managed independently due to commercial sensitivities. Logista is responsible for its own data, including ESG-related data, and, accordingly, remains out of scope for all Imperial ESG-related KPIs.



www.grupologista.com

OUR BUSINESS AND SUPPLY CHAINS

OUR BUSINESS AND WORKFORCE IN 2024

25,000

employees
worldwide

27

manufacturing
sites

£8.2 bn

generated in
tobacco and NGP
net revenue



160

brands in
our portfolio

£2.4 bn

in capital returned
to shareholders

c.120

markets we
operate in

OUR BUSINESS AND SUPPLY CHAINS

OUR SUPPLY CHAINS

Suppliers are essential partners in our business operations – and their commitment to quality, innovation and ethical practices supports both our commercial success and our ESG agenda.

We establish a relationship of trust and integrity with our suppliers. We expect our suppliers to conduct their business in an ethical and responsible manner and comply with all applicable laws and regulations, provide a fair and safe workplace, and demonstrate respect for human rights, diversity, equity, and inclusion. Additionally, we expect our suppliers to adopt policies and practices that protect the planet and reduce negative environmental impacts.

Our respect for human rights is reflected in our requirements for supplier standards, business conduct and employment practices. Our Supplier Code of Conduct, launched in 2023, is available in 32 languages and sets out the behaviours we expect our suppliers to demonstrate.

This update also aligns with our sustainability commitments as part of our ESG strategy.

The Supplier Code of Conduct is embedded into our Procurement Policy and processes, which govern how we select and contract with our suppliers.

We have regular meetings throughout the year with our centrally managed suppliers where any ESG-related concerns can be raised. If a supplier fails to demonstrate its commitment to ESG, we may require improvements or we have the option to terminate the relationship.

We recognise that, along with our direct operations, our supply chain has the potential for human rights abuses. We are committed to working with our suppliers and business partners to improve supply chain standards. Our refreshed Supplier Code of Conduct reflects our sustainability commitments as part of our ESG strategy.

Our ambition does not stop at minimum standards. We will look to address activities that we think may breach the Supplier Code of Conduct, and we encourage our suppliers to seek opportunities to go beyond the expectations outlined in it so we can, together, make a positive social and environmental impact.

OUR BUSINESS AND SUPPLY CHAINS

CASE STUDY

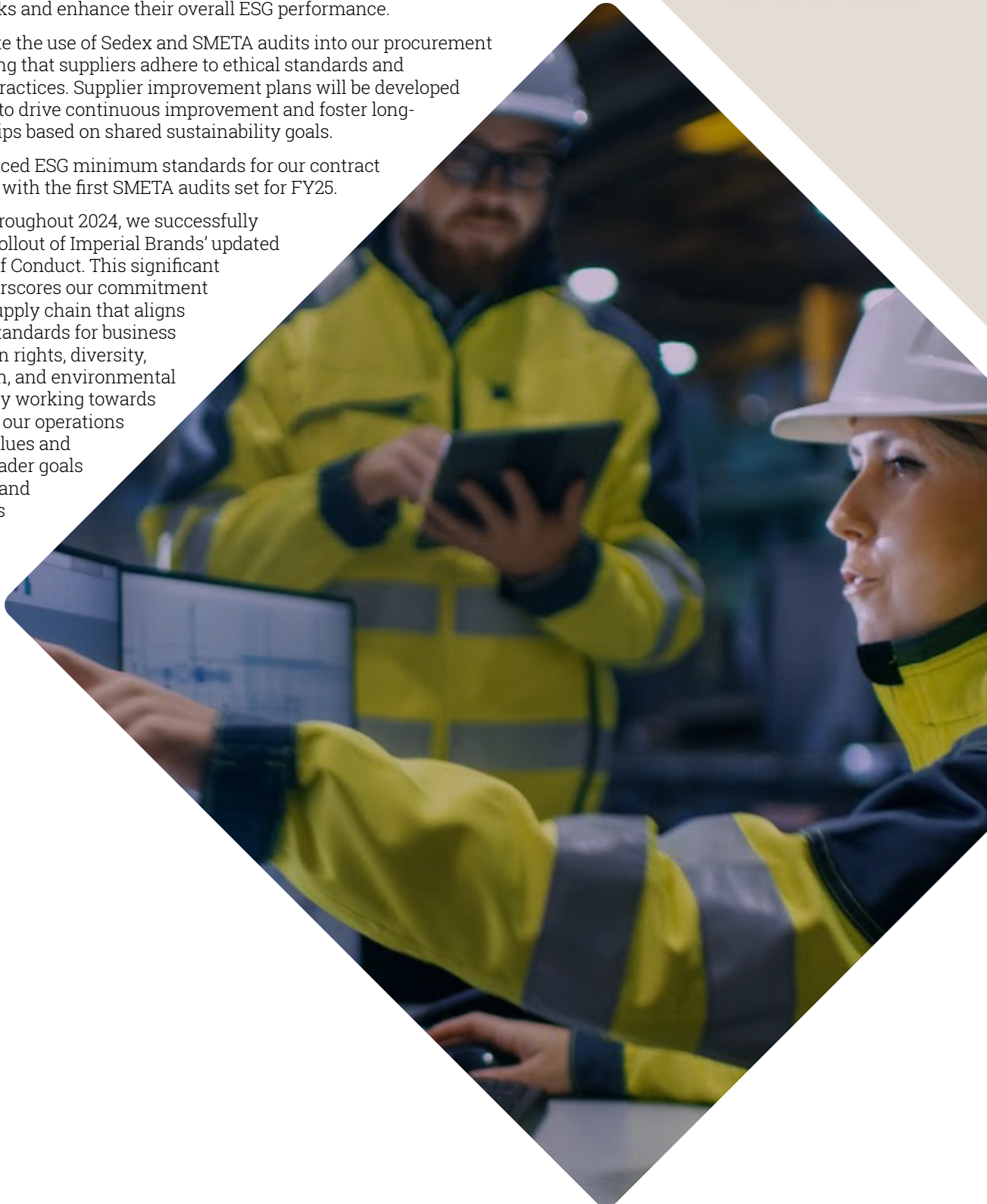
We have opted to use Sedex (Supplier Ethical Data Exchange) to enhance supply chain visibility, assess risks and ensure compliance with legislation. We expect our partner suppliers to be registered with Sedex (or an equivalent platform) and to have initially completed a self-assessment questionnaire covering the following categories: Labour, Health & Safety, Environment, and Business Ethics.

We have met our 2024 target of implementing third-party ethical risk assessments for over 60% of our partner suppliers. In 2025 we will expand our use of SEDEX and third-party risk assessments. We have established a risk-based approach to determine when suppliers need to undergo a Sedex Members Ethical Trade Audit (SMETA) by a verified third-party auditor. Using the audit results, we will encourage our suppliers to take action to minimise risks and enhance their overall ESG performance.

We will integrate the use of Sedex and SMETA audits into our procurement process, ensuring that suppliers adhere to ethical standards and sustainability practices. Supplier improvement plans will be developed and monitored to drive continuous improvement and foster long-term partnerships based on shared sustainability goals.

We also introduced ESG minimum standards for our contract manufacturers, with the first SMETA audits set for FY25.

Additionally, throughout 2024, we successfully continued the rollout of Imperial Brands' updated Supplier Code of Conduct. This significant milestone underscores our commitment to fostering a supply chain that aligns with our high standards for business integrity, human rights, diversity, equity, inclusion, and environmental sustainability, by working towards this, we aim for our operations to reflect our values and support our broader goals for responsible and ethical business practices.



OUR BUSINESS AND SUPPLY CHAINS

OUR SUPPLY CHAINS

We have two distinct supply chains consisting of tobacco leaf supply and Non-Tobacco Materials supply (NTM), which includes NGP, indirect goods and services, and logistics.



TOBACCO LEAF SUPPLY

We work with our suppliers to advance good agricultural practices and are committed to purchasing tobacco from socially and environmentally responsible suppliers.

We source tobacco globally, primarily through large international tobacco merchants. We have a global sourcing footprint covering Africa, the Americas, Asia and Europe. Of these, our largest tobacco-sourcing countries include Brazil, India, Spain, and China.



We purchase approximately 97% of our tobacco by value through both global and niche suppliers from more than 30 countries worldwide, and around 3% from our own directly contracted farms.

In 2024, we purchased more than 99,000 tonnes of tobacco leaf from 32 countries around the world.

Based on the 2023 tobacco leaf crop year, 100% of our suppliers reported on their due diligence and actions taken through the Sustainable Tobacco Programme (STP). The STP includes a human rights module and specifically references guidance on modern slavery. Further information on STP is detailed in the statement's Assessment of Modern Slavery Risk in our Operations and Supply Chain.

c.99,000

tonnes of tobacco leaf purchased from 32 countries



NON-TOBACCO MATERIALS SUPPLY (NTM)

NTMs that we buy include paper, filters, glue and ingredients for cigarette and cigar products. Together with the components that go into making NGP, such as plastic casings, batteries and heaters, these represent the materials which are directly used in the manufacturing process and part of the final product. We also refer to these NTMs as 'direct materials' because they are included in our products.

We also procure goods and services that, while an essential part of the overall manufacturing or operations process, are not integrated into the final product. We refer to these as 'indirect', or general goods and services. These include IT hardware and software, professional and corporate services, the provision of utilities, facilities management and logistics.

All our key strategic direct and indirect suppliers are managed by our global procurement central category teams, and smaller suppliers are managed by our local procurement teams. Year-on-year, we consolidate the number of suppliers where we can, to better enable oversight and control over the supply chain.

In 2024, we had 224 direct material suppliers, 75 of which are managed centrally by our global procurement team and 149 managed by our local procurement teams. Of our direct material supplier base, approximately 85% of our main spend is with 24 suppliers.

c.12,000

suppliers on our approved direct and indirect supplier list

GOVERNANCE AND POLICIES



As a global business, we recognise the role we have in promoting respect for human rights, including the prevention of modern slavery.

GOVERNANCE AND POLICIES



A governance structure for ESG responsibilities includes the Group ESG and Group Ethics & Compliance Committees which report to the Executive Leadership team and the People, Governance & Sustainability Committee of the Board.

Endorsed by the ESG Committee, our Human Rights Compliance Working Group (HRCWG) operates to strengthen our human rights due diligence framework.

We maintain a human rights risk appetite statement, which is endorsed annually by the Risk Committee and the Board.

GOVERNANCE

To help the Board with overseeing ESG issues, the People and Governance Committee has been reframed as the People, Governance & Sustainability (PGS) Committee, chaired by the Chair of Imperial Brands.

The PGS Committee receives input from two Executive Committees: the Group ESG Committee and the Group Ethics and Compliance (GEC) Committee, both chaired by our CEO. The PGS Committee monitors the management and mitigation of key ESG and ethics and compliance (E&C) risks, as well as the Group's ESG and E&C performance.

The GEC Committee is responsible for providing leadership and oversight of our ethics and compliance programme. It supports and reinforces effective mitigation of ethics and compliance risk, oversight of investigations, review of the Group and Supplier Codes of Conduct and activities and processes that foster ethical business conduct, and legal and regulatory compliance.

The ESG Committee is responsible for overseeing our People and Planet agenda. It considers the Company's progress on ESG commitments and objectives, as well as the resources allocated to them.

RELATED POLICIES

[Code of Conduct](#)

[Supplier Code of Conduct](#)

[Human Rights Policy](#)

[Speaking Up \(whistleblowing\)](#)

[Anti-Bribery and Corruption Policy](#)

[Employment Policy](#)

[Fairness at Work Policy](#)

[Global Procurement Policy](#)

[Group Environmental Policy](#)

[Group Health, Safety and Wellbeing Policy](#)

POLICIES

As a global business, we recognise the role we have in promoting respect for human rights, including the prevention of modern slavery and human trafficking. Our policy is to respect and support the dignity, wellbeing and human rights of our employees, the workers in our supply chain and the communities in which we operate.

Our Code of Conduct ("the Code") is the foundational document of our Imperial Brands governance framework. It is our guide to doing the right thing and outlines the standards of behaviour that we expect from everyone who works for our organisation.

It is aligned with the policies, internal controls and risk management processes that underpin our strategy. The Code sets out the responsible behaviours we expect, including from employees in their dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, and advisers.

In 2024, the Code was revised and aligned with our Strategy, Behaviours, ESG Strategy and our 2023 Supplier Code of Conduct.

The revised Code highlights the importance of Speaking Up about concerns and the value Speak Ups can bring to a strong culture of compliance.

Our commitment to human rights is a fundamental part of the Code and our Supplier Code of Conduct.

We expect our employees to comply with applicable human rights laws and with the human rights commitments contained in the Code and our Human Rights Policy.

The Supplier Code of Conduct is embedded into our Procurement Policy and processes, which govern how we select and contract with our suppliers.

Our commitment to respect human rights is informed by internationally recognised standards, including the International Bill of Human Rights², the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the ILO's core conventions³, as well as the principles contained within the UN Guiding Principles on Business and Human Rights⁴ (UNGPs) and the UN Sustainable Development Goals⁵ (UNSDGs).

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

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

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

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

GOVERNANCE AND POLICIES

POLICIES (cont.)

Our Human Rights Policy applies to all Imperial Brands companies, including wholly owned subsidiaries, and to any joint venture where Imperial Brands has management control. We also encourage our standards to be applied in joint ventures where we do not have management control. Our Human Rights Policy applies to all employees, directors, and officers of Imperial Brands companies, including temporary and contract staff. In 2021, we conducted an expert review of our policy to increase alignment with international standards such as the UNGPs and the ILO Conventions. In 2022, we refreshed our Human Rights Policy in the spirit and ambition of our new ESG Strategy. As part of that work, we acted on feedback from a number of external agencies and internal stakeholders. In 2023, we reviewed our Human Rights Policy to ensure it reflected new trends and developments in respecting and promoting human rights. We also included an updated list of our human rights risks, also known as 'salient issues'. One of the salient issues identified is modern slavery.

In 2024, we revised our definition of child labour, another salient issue, to provide clearer guidance on our stance. It is as follows:

"We do not tolerate child labour. Child labour is defined as work that deprives children of their childhood, potential, and dignity, and is harmful to their physical and mental development. Our policy is consistent with the standards established by ILO Conventions No.138 (Minimum Age), No.182 (Worst Forms of Child Labour), and No.184 (Health & Safety in Agriculture).

Our minimum age for employment to full work is 15 years or the minimum age in accordance with local laws, whichever affords greater protection⁶. No young person below 18 should be involved in any type of hazardous work⁷. Light work may be permitted in accordance with local laws, provided this does not interfere with schooling, health, or personal development.

We consider that decent and safe youth employment above the local legal working age can be an important contribution to young people's development, their future, and for economic opportunities in the communities in which we operate."

Through our procurement processes, we expect our suppliers to meet the minimum standards outlined in our Supplier Code of Conduct – and go further where possible or required by contractual agreement. We take a 'continuous improvement' approach to the implementation of these standards. Where a breach of our Supplier Code of Conduct is suspected, we may request the supplier to cooperate with an internal or external review and to make improvements. Otherwise, we can have the option to terminate the relationship. We also expect our suppliers to endeavour to ensure that their own business partners meet standards comparable to those set out in our Supplier Code of Conduct.

Our Supplier Code of Conduct, reinforces our commitment to conducting our business ethically and respecting and promoting human rights and the environment.

Compliance with our Code and Supplier Code of Conduct is monitored through the due diligence processes outlined from page 22.



6. ILO Convention 138 establishes that certain developing countries may specify a minimum age of 14.

7. Hazardous work must be referenced against the list issued by each country, as established by ILO Convention 182 on the Worst Forms of Child Labour, which has been universally ratified.

GOVERNANCE AND POLICIES

CASE STUDY

'LEADING ON HUMAN RIGHTS INNOVATION'

CCLA Investment Management are the co-ordinators of the "Find it, Fix it, Prevent it" framework, a collaborative investor initiative focused on combating modern slavery. It currently represents 65 investors with a collective asset under management or advisory of £15 trillion.

Each year, CCLA's benchmark assesses the top 100 UK-listed companies by market capitalisation on their efforts to combat modern slavery, using the Find it, Fix it, Prevent it engagement framework.

In the final days of the 2024 financial year, Imperial Brands was upgraded to a Tier 1 Company, along with only 11 other companies. As part of its Tier 1 ranking, Imperial Brands is described as having an "evolved and mature approach to human rights due diligence, [demonstrating] extensive discussion on the risks, case studies on systemic modern slavery risks in the sector, and discussion on meaningful activity to find, fix and prevent modern slavery."

This independent, external recognition is a testament to our efforts in minimising our exposure to modern slavery and labour exploitation risks.

CCLA
GOOD INVESTMENT



GOVERNANCE AND POLICIES



Our Human Rights Policy applies to all Imperial Brands companies, including wholly owned subsidiaries, and to any joint venture where Imperial Brands has management control.

In 2021, we strengthened our alignment with international standards, including the UNGPs and ILO Conventions. Our Human Rights Policy was updated in 2022 and reviewed again in 2023. Additionally, we introduced a new Supplier Code of Conduct in 2023.

REPORTS OF MODERN SLAVERY

In 2023, within our direct Leaf operations, we reported on two findings from a third-party Human Rights Impact Assessment (HRIA) conducted in Madagascar during the previous reporting period. The HRIA risks identified included fair treatment, health and safety, and working hours. The action plan developed and implemented from 2023 to 2024 is now being evaluated for effectiveness, and following this assessment, it will be reviewed and revised for the coming crop year.

We found two instances of non-conformance with policy in relation to transport fees and the retention of identity cards on one of our commercial farms. They related to seasonal migrant workers from the south of Madagascar who travelled north for the tobacco growing and harvesting season. We found that 109 seasonal migrant workers had had their identity cards temporarily retained by local farm offices, and 979 migrant workers had paid transport fees totalling USD 30,000 during the growing season in 2022. Immediate remediation followed. Actions included returning any identity cards still held, steps to fully reimburse the transport fee and refresher training to reduce the risk of recurrence.

We take these findings seriously. We have closely monitored the remediation actions taken on our commercial farms in Madagascar to reduce the risk of recurrence. No further instances have been identified. We faced challenges contacting all affected workers to make reimbursements in a country where many people do not have access to mobile phones or email and where word-of-mouth and informal referrals are used for recruitment. As a result, our best efforts to reimburse the entire population of workers have been impacted, and this aspect of our remediation remains in progress. We have learned from this challenge, aiming to enhance seasonal worker record-keeping and formalise recruitment channels. For the crop year 2024, all workers – both migrant and locally resident – were recruited directly by our People & Culture (P&C) team. The immediate action to stop transport fees for seasonal migrant workers has been fully implemented with the introduction of company provision of transport. We have engaged nearly 1,000 workers on our commercial farms during the 2024 crop season. We asked for their feedback on the remediation actions implemented since 2023, and they gave a 92% satisfaction rate. We remain committed to continuing to listen, learn, and evaluate the effectiveness of remediation actions to address root causes.

GOVERNANCE AND POLICIES

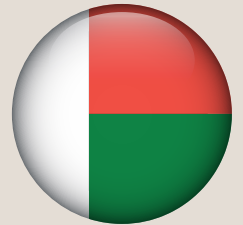
CASE STUDY

TOBACCO FARMER NON-CONFORMANCES IN MADAGASCAR

We found non-conformances by one directly contracted farmer in Madagascar during the 2023 crop season relating to the farmer's employment of one migrant worker. The farmer and worker had agreed terms of employment we found to be contrary to our policy and the contract between us and the farmer. The non-conformances related to unpaid overtime, payment-in-kind and the temporary retention of the worker's identity card.

Immediate remediation followed. Actions included: requesting that the farmer immediately return the worker's identity card and fully reimburse unpaid wages, and re-training the farmer on the policy, to reduce the risk of recurrence. We terminated our contract with the farmer for the crop year 2024 and will consider reinstating our contract in future, if strict compliance and monitoring requirements are met.

We have learned from this incident, aiming to enhance our monitoring systems and controls, such as piloting mandatory payslip booklets for farmers, additional training approaches for farmers, and steps to increase awareness in workers of their rights.



GOVERNANCE AND POLICIES

CASE STUDY

COLLABORATIVE EFFORTS TO COMBAT CHILD LABOUR IN SUPPLY CHAINS IN THE IVORY COAST

During an internal informational webinar in February 2024, one of our employees raised a concern about the potential use of child labour by one of our Empty Package Survey (EPS) suppliers in a region of the Ivory Coast. Immediate action was taken. EPS operations in the country were halted, and a review was conducted. We found that on at least one day in February, three underage children were involved in the work.

Immediate remediation followed. Actions included: a risk assessment of the EPS operation to identify areas for enhancement, and the identification of steps to reduce the risk of recurrence.

Fostering open communication, raising awareness, and providing training to our employees on modern slavery and labour exploitation enhance our ability to identify potential human rights violations.



GOVERNANCE AND POLICIES

SPEAKING UP

The Group's Speaking Up process provides an important mechanism through which reports of modern slavery or other alleged human rights abuses can be made. In addition, there are several other ways for our employees to raise concerns, including via their People Leader or local P&C business partner. Alternatively, it is also possible to contact Group Legal directly.

Our Speaking Up channel is equally available to temporary workers, suppliers, external business partners and the communities in which we work. Concerns can be reported confidentially through our secure online Speaking Up platform, accessible from a PC or mobile device by scanning the QR code or visiting <https://imperialbrands.whistleblownetwork.net>. Reports can be submitted anonymously if preferred. Additionally, in some countries, a local toll-free telephone number is available for reporting concerns; a list of these numbers can be found in our [Speaking Up Policy](#).

We will protect the confidentiality of anyone who speaks up and will not tolerate any form of retaliation or discrimination against someone who raises a concern or participates in an investigation. Retaliatory behaviour may result in disciplinary action, up to and including dismissal.

An example of the value of Speaking Up took place in 2024: two reports of employee misconduct were raised by employees on our commercial farms in Madagascar through our Speaking Up channels. The reports related to the treatment of employees by supervisors which was against our Code of Conduct. The reports were independently investigated and substantiated. We took disciplinary action in response.

Updates on our Speaking Up process and incidents are provided to the Board-level PGS Committee.

THE IMPORTANCE OF ASKING FOR HELP AND SPEAKING UP

We take any allegations relating to human rights extremely seriously. We believe that by sharing our opinions and concerns, we can innovate, improve, and become more effective as an organisation. We can reduce risks and resolve issues by telling people about unsafe conditions or improper behaviour to create a better, safer workplace.

We established a Modern Slavery Working Group to escalate any concerns of modern slavery effectively. We have utilised this internal cross-functional working group to review our existing escalation process to identify potential areas for improvement. One of our modern slavery commitments for 2023 was to develop a modern slavery toolkit to help our colleagues enhance their knowledge about modern slavery - including identifying key indicators and characteristics, escalate and report any concerns and respond appropriately to potential victims. We undertook this in conjunction with Slave-Free Alliance (SFA), a civil society organisation of which Imperial Brands is a founding member. The Human Rights Compliance Working Group endorsed the toolkit, which was presented to the ESG Committee in September 2023.

In 2024, we developed a standardised local escalation process aligned with our Speaking Up Policy and shared it with an initial selection of local champions. This was intended to enhance our understanding of the steps to take if we identified potential cases of modern slavery or labour exploitation in our operations. The new local escalation process is available in several languages.

SPEAKING UP



The Speaking Up Policy is made available both internally and on the Group website in over 30 languages.

Further information can be found in our [Speaking Up Policy](#).

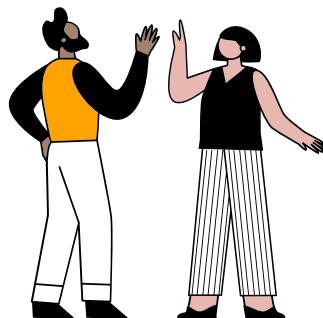


Further information can be found in our Speaking Up Policy.

For further information on how we are addressing ESG-related topics please visit our website:

www.imperialbrandsplc.com/healthier-futures

SPEAKING UP



ASSESSMENT OF MODERN SLAVERY RISK WITHIN OUR OPERATIONS AND SUPPLY CHAIN

Our ongoing commitment to human rights includes a desire to make a positive impact within our suppliers' tobacco-growing communities. The Sustainable Tobacco Programme (STP) is our key framework enabling this commitment.



ASSESSMENT OF MODERN SLAVERY RISK WITHIN OUR OPERATIONS AND SUPPLY CHAIN



Our ongoing commitment to human rights includes a desire to make a positive impact within our suppliers' tobacco-growing communities. The Sustainable Tobacco Programme is the key framework enabling our commitment.

We collaborate with our suppliers to enhance standards and minimise leaf supply risks in our leaf supply chain. We establish and maintain supplier partnerships through STP.

The STP is an industry body which verifies annual supplier self-assessments. To accelerate positive social and environmental impact in tobacco-growing communities, we aim to enhance agricultural supply chain due diligence.

The STP is independently managed and provides us with enhanced visibility over our leaf supply chain in two ways:

1. By empowering our suppliers to report on the actions they are taking to address any risks identified, and how they are having a positive impact on the ground.
2. By verifying these actions taken either remotely or in the field. This informs our strategy to support our suppliers in taking effective action.

We use this information to design our response to support our leaf suppliers in implementing effective measures through action plans. We maintain a dialogue with these suppliers to monitor their progress and provide support through Leaf Partnerships, enhancing long-term projects and initiatives. Through Leaf Partnerships, we work directly with our leaf suppliers to fund identified projects on a risk-based approach and support their impact in tobacco-growing communities.

We enhance the STP data gathered, analysed and responded to by conducting in-country verifications. The purpose is to corroborate information provided by suppliers through STP on their approach to address potential risks identified, and further understand their systems, processes and interventions in place. In 2024, in-country verification was conducted in three of our five priority countries⁸ that had not been verified in 2023 and a further three countries, as a risk-based selection. These exercises gave us the opportunity to see where suppliers could benefit from support to increase their impact, through Leaf Partnerships. Our progress in the remaining two of our priority countries was impacted by regional conflict and civil unrest.

In 2024, we participated in seven independent Supply Chain Impact Assessments (SCIA) conducted in the field and jointly commissioned through the STP. One focus of the SCIA was to identify human and labour rights risks, and support suppliers to develop prioritised action plans. One SCIA, conducted in Mexico in partnership with other tobacco manufacturers, involved two tobacco suppliers.

A total of 280 leaf growers, workers, family and community members were engaged across these suppliers' tobacco-growing communities to support the supplier to identify human rights risks and impacts including: a lack of personal protective equipment (PPE), inadequate sanitary and hygiene facilities on-farm, and the employment of workers under 18 years old in potentially hazardous tasks. As a result of the SCIA, both suppliers put in place remediation plans. We suspended our supply contract with one supplier following confirmed incidence of child labour. Our preferred approach is to work with and support our suppliers, aiming to assist them to improve conditions for affected workers. As such, we continue to engage with the suspended supplier and follow closely the implementation of their remediation actions and measures taken to reduce the risk of recurrence. We will consider reinstating the supplier in the future in the event that it has addressed the key risks and impacts.

We are proud to be a founding member of SFA and continue to support the international charity Hope for Justice in their pursuit of a slave-free world. As part of our modern slavery commitments for 2023, with SFA we developed a modern slavery toolkit to help our employees enhance their knowledge about modern slavery, identify its key indicators and characteristics, respond appropriately to potential victims, and escalate and report any concerns. To reach a wider audience, we have translated this toolkit into French and Filipino, with more languages to follow.

To further raise awareness of modern slavery, we have developed a standardised local escalation process, translated into several languages, to provide guidance on responding to concerns. We will continue to expand the use of this process and aim to include it in our planned Human Rights Corners. These notice boards, placed at various locations, will display key information on human rights and modern slavery, translated into the languages spoken at each site.

8. Our Country Rating Model prioritises our sourcing origins based on several factors, including human rights risks.

ASSESSMENT OF MODERN SLAVERY RISK WITHIN OUR OPERATIONS AND SUPPLY CHAIN

CASE STUDY

HUMAN RIGHTS CORNERS

One of our human rights ambitions is to conduct training and introduce communication initiatives to increase awareness of human rights, particularly for those who do not regularly work in front of a computer and those for whom English is not their first language. We believe that striving for a solid understanding will help prevent potential human rights violations from occurring.

Inspired by actions taken at our Greensboro Operations manufacturing site in the US, we will continue to expand the use of this process and aim to include it in our planned Human Rights Corners. These notice boards, placed at various locations, will display key information on human rights and modern slavery, translated into the languages spoken at each site. With the support of local champions and our Communications and Learning & Development team, we aim to provide communication content in local languages to enhance accessibility and understanding.



ASSESSMENT OF MODERN SLAVERY RISK WITHIN OUR OPERATIONS AND SUPPLY CHAIN

MODERN SLAVERY SELF-ASSESSMENTS

Building on a modern slavery review project conducted across our manufacturing sites, we mapped out the modern slavery workforce risks and potential areas of concern for our Global Supply Chain operations. This included owned factories' distribution centres and ITG Brands' operations management.

We used a self-assessment questionnaire for 21 modern slavery leading indicators to assess our baseline. From this exercise, we learned that improvements could be made in the clarity of the self-assessment questionnaire, and there were practical challenges in gathering data from some manufacturing sites. These findings were instrumental in shaping several modern slavery commitments for 2024.

To continue to minimise our risk of being exposed to modern slavery and labour exploitation, we reframed our modern slavery indicators to Human Rights Leading Indicators (HRLI). These indicators are a series of questions upon which we ask Imperial Brands-operated manufacturing sites to report, covering areas including policies and procedures, employment contracts, training, recruitment, and speaking up. We have revised the wording of each indicator, added further guidance, and included examples of how to meet them.

The introduction of the HRLI aims to support our own-operated sites to better understand our human rights expectations. We also seek to improve the accuracy of our reporting and strive for alignment with our Human Rights Policy. We endeavour to report on the indicators in 2025 and enhance compliance through our local champions. Our champions network offers a forum where sites facing similar challenges can collaborate and share best practices, as well as new materials. Those sites that are yet to meet the HRLI will develop action plans to address potential gaps.



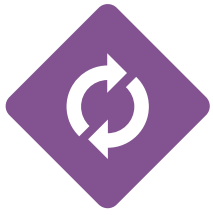
98% of our factory sites' self-assessments are compliant with our leading indicators. There are two sites that will address gaps to reach compliance with our internal standard in FY25.

DUE DILIGENCE PROCESSES

Our focus in 2024 was to continue strengthening our due diligence process in alignment with international frameworks, including the UN Guiding Principles on Business and Human Rights, and legislation to ensure we are equipped to identify, prevent, and mitigate potential human rights risks.



DUE DILIGENCE PROCESSES



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- We reframed our modern slavery leading indicators as Human Rights Leading Indicators (HRLI). We also enhanced the descriptions of these indicators, providing further guidance and examples. The introduction of the HRLI aims to help our own-operated sites better understand their requirements. We also seek to improve the accuracy of our reporting and strive for alignment with our Human Rights Policy.
- In addition to our operated manufacturing sites, we have invited three groups of neighbouring countries - or "clusters" - to begin reporting against our HRLI. The clusters comprise the West Africa cluster (with the Ivory Coast as a pilot), the South East Europe (SEE) cluster (with Italy and Greece as pilots), and the Australasia cluster (with Australia as a pilot).
- As part of our modern slavery commitments, we targeted to conduct three in-person modern slavery audits, but we successfully completed five, expanding the audit work to geographically proximate sites. In the Ivory Coast, we audited our Abidjan printing factory and the Bouaké factory, approximately 350 kilometres from the capital; and in the US, we audited our factories in Greensboro, North Carolina, and McAdoo, Pennsylvania. The fifth audit was conducted at our Ain Harrouda factory in Morocco. Expanding the audit work enhanced our understanding of the local context and enabled us to share best practices with other factories facing similar challenges.
- We piloted additional lighter-touch modern slavery audits conducted online in Burkina Faso, Madagascar, Puerto Rico, Taiwan, and the US. These targeted sites consistently reported strong compliance with our leading indicators and helped identify potential inconsistencies and share best practices.
- Separately, our Group Internal Audit (GIA) team assessed human rights controls in factories located in Joure (Netherlands), Bangui (Central African Republic), Sävsjö (Sweden), and Manisa (Türkiye). Observations were raised in two audit reports (Joure and Bangui). By the end of 2024, all recommendations made by GIA had been implemented by the respective factories.
- We closely monitored the latest developments in upcoming legislation, such as the European directives on corporate sustainability reporting and corporate sustainability due diligence. We aim to be fully prepared for when these regulations come into effect to avoid any disruptions in our value chain.



DUE DILIGENCE PROCESSES

CASE STUDY

LIGHTER-TOUCH MODERN SLAVERY AUDITS

Recognising that in-person modern slavery audits covered only a small portion of our reporting sites, in 2024 we piloted lighter-touch modern slavery audits, conducted online and focused on a selection of our leading indicators. These indicators included the prohibition of modern slavery, implementation of measures to prevent harassment and threatening behaviour, communication of our Speaking Up services, employment contracts stating working hours and wages, and monitoring of records to identify high levels of occupancy at a single address. The lighter-touch audits provided an additional opportunity to consider approaches being taken in different locations and to develop action plans to enhance our performance.



DUE DILIGENCE PROCESSES

OUR OPERATIONS

In 2024, we took steps to enhance our human rights due diligence processes across our sites, consolidate access to our Speaking Up process, and further embed human rights awareness across functions within the business. This included conducting five in-person international modern slavery audits. We selected these locations using a combination of international data and local knowledge from our own operations. They were unique opportunities to identify and act on potential concerns and gain a better understanding of the local context. Additionally, we piloted lighter-touch modern slavery online audits in Puerto Rico, Taiwan, Madagascar, Burkina Faso, and the US.

The audits did not identify any instances of suspected modern slavery. Areas of improvement were identified. These included clarifying the benefit of engaging with suppliers to encourage them to check any high levels of occupancy of people at a single address and to check for unrelated people using the same bank account.

Our operations are regularly monitored and audited using a risk-based approach. Where a risk is identified, internal audits can include an assessment of labour practices, health and safety procedures in place as well as assessing local employee awareness of, and training in, the following: Imperial's Code of Conduct; International Marketing Standards; Whistleblowing Policy; and Grievance Policy.

GIA continued to develop the Human Rights Internal Audit Module, applying it in selected locations using a risk-based approach, as part of Imperial Brands' factories and markets audit plan. The Human Rights Audit Module was recently reviewed and updated to reflect the new HRLIs.

The modern slavery leading indicators were reviewed during four factory audits in the financial year 2024 in Joure (Netherlands), Bangui (Central African Republic), Sävsjö (Sweden), and Manisa (Türkiye). Observations were raised in two audit reports (Joure and Bangui). By the end of 2024, all recommendations made by GIA had been fully implemented by the respective factories.

Modern slavery was also reviewed as part of four market audits, which considered general awareness and supplier-related risks.

DUE DILIGENCE PROCESSES

TOBACCO LEAF SUPPLY

We wish to make a positive impact within our suppliers' tobacco-growing communities and we are working in partnership with our leaf suppliers to identify issues within tobacco-growing communities. We use Supply Chain Impact Assessments conducted in collaboration with our suppliers, which enable us to focus on local priorities and strengthen policy commitments and standards in order to increase the positive impact of our actions.



All Human and Labour Rights potential issues reported to date by suppliers through STP⁹ have been acted upon and Imperial has engaged with suppliers on their efforts to address those issues. This approach includes our 'Leaf In-Country Verification' methodology to corroborate information provided by suppliers through STP on their approach to address potential risks identified, and further understand their systems, processes and interventions in place. We conducted this in-country verification for three of the remaining five¹⁰ priority countries¹¹ in 2024¹² and completed an annual review to improve this process.

Within our leaf supply chain seven Supply Chain Impact Assessments (SCIA) have been conducted. For those that are complete, supplier action plans are in progress.

Our 'Leaf Partnership' programme supported over 128,000¹³ new beneficiaries in our priority countries across Africa, Asia, the Americas, and Europe. In funding these projects, we aim to boost our suppliers' efforts at addressing the root causes of human rights risks within their supply chains.

9. Crop year data is reported on STP once the season is fully completed, and then undergoes a desktop validation. Crop year 2023 has now been fully responded to by Imperial.

10. The fifth country was deemed out of scope due to regional conflict and posed personal safety and security risk for travel.

11. Our Country Rating Model prioritises our sourcing origins based on several factors, including human rights risks.

12. We had conducted in-country verification across seven of our twelve priority countries in 2023.

13. This number represents the number of new beneficiaries from 2024 projects.

DUE DILIGENCE PROCESSES

TOBACCO LEAF SUPPLY

ADDRESSING CHILD LABOUR RISKS

As with other agricultural industries, the risk of child labour is highest in the cultivation part of our supply chain. In addition to working directly with our suppliers, we recognise that child labour is a multi-stakeholder issue, which no single entity can address in isolation.

In collaboration with key stakeholders, including the industry and suppliers operating in these communities, we seek to address the risk of child labour through three main activities:



STP

The Human and Labour Rights section of STP is a critical element for the respect of human rights and is aligned with the relevant International Labour Organisation (ILO) core conventions and the principles and guidance contained within other external frameworks such as the UNGPs.



Our Leaf Partnership Projects

We work directly with our leaf suppliers to fund projects in tobacco growing communities to help tackle some of the root causes of child labour.



The Eliminating Child Labour in Tobacco Growing Foundation (ECLT)

We are members of the ECLT and support its aims to tackle the root causes of child labour.

DUE DILIGENCE PROCESSES

SUSTAINABLE TOBACCO PROGRAMME

In 2024, we continued to collaborate with the industry and enhanced our due diligence processes to identify, prioritise, respond, measure, and report on the work we and our suppliers do as part of a continual process to improve human rights impact.

Through cross-industry dialogue and a continual improvement cycle, the STP has been designed to enable our suppliers to report on the steps they are taking to produce a sustainable quality supply of tobacco leaf, as well as providing the opportunity for farmers to improve labour standards, raise standards of living and address environmental challenges, by sharing knowledge on good agricultural practices.

All suppliers from whom we source tobacco are expected to participate in the STP. STP is independently managed on behalf of the participants by a Secretariat and is a framework for continuous improvement. Using an independent online platform, the Secretariat gathers specific data across eight themes – one of which is Human and Labour Rights – from suppliers via an annual self-assessment questionnaire. All this data is validated remotely and verified in-field on a risk basis by independent subject-matter experts.

Through the STP, suppliers are empowered to report on any risks identified and, on the actions, they are taking to address them. When this data is verified, the programmes and interventions that are in place in our supply chains

are checked and measured. Additionally, we complement this process with in-country verifications carried out by our Leaf team to corroborate information provided by suppliers through STP on their approach to address potential risks identified and further understand their systems, processes and interventions in place. In 2024, in-country verification was conducted in three of our five priority countries¹⁴ which had not been verified in 2023 and a further three countries, as a risk-based selection. These exercises gave us the opportunity to see where suppliers could benefit from support to increase their impact, through Leaf Partnerships. Our progress in the remaining two of our priority countries was impacted by regional conflict and civil unrest.

The STP annual assessment is part of our formal supplier relationship management and is integral to the suppliers' ratings that we determine along with quality, cost and value. Where a supplier persistently fails to demonstrate how they are managing their environmental, social and governance responsibilities in a certain sourcing origin, we will consider ceasing purchases from it.

DUE DILIGENCE PROCESSES

Through our procurement processes, we expect our suppliers to meet the minimum standards outlined in our Supplier Code of Conduct. We have regular meetings throughout the year with our centrally managed suppliers where any ESG-related concerns can be raised. If a supplier fails to demonstrate its commitment to ESG, we may require improvements or we may terminate the relationship.

NTM AND NGP SUPPLY

The Supplier Qualification Programme is the first screening process for all new NTM and NGP suppliers. This involves suppliers completing a self-assessment, which includes questions on business conduct, environmental management, and labour practices, including discrimination, child and forced labour, freedom of association, remuneration, working hours and health and safety.

As our NGP business grows, we are considering ways to reduce the risk of conflict minerals in our supply chain by asking our NGP suppliers to complete a Conflict Mineral Reporting Template that allows for the tracing of 3TG (Tungsten, Tin, Tantalum, and Gold) in our supply chain.

Once on board, our Global Quality team perform their own reviews, which may include the supplier being asked to provide evidence for their management of ESG issues, including how the supplier communicates their own Code of Conduct and grievance policies across their operations and how they conduct audits and act on findings.

SERVICES AND GOODS SUPPLY

Our logistics and indirect suppliers of goods and services, including facilities management, do not undergo the Supplier Qualification Programme. Where we have run a tender process, we request the supplier provide copies of policies relevant to the services that they supply, which may include those addressing labour practices, forced labour and child labour (in the case of service outsourcing or goods manufacture). We review the policies as part of the selection process.

For larger service requirements, for example a new outsourced service or a move of service provision to a different geography, or goods manufacture for Imperial, we would typically conduct a site visit as part of the selection process. We do not carry out regular onsite audits of our indirect suppliers. Any site visits would be ad-hoc and defined on a case-by-case basis if an area of ESG risk has been identified.

14. Our Country Rating Model prioritises our sourcing origins based on several factors, including human rights risks.

EXTERNAL ALLEGATIONS & REMEDIATION

We are committed to investigating potential human rights issues identified within our supply chain and direct operations. We take any allegations relating to human rights, including modern slavery, extremely seriously.

EXTERNAL ALLEGATIONS AND REMEDIATION



We are committed to investigating potential human rights issues identified within our supply chain and direct operations. We take any allegations relating to human rights, including modern slavery, extremely seriously. We pursue multi-stakeholder initiatives, including an industry-wide Sustainable Tobacco Programme which is aligned to the UNGP and engage both internally and with any relevant external stakeholders, which may include suppliers and NGOs, to investigate allegations and respond to any issues identified effectively.



MALAWI

In June 2020 Imperial Brands responded to a claimant law firm's allegations of human rights issues in the Malawian tobacco supply chain, which included allegations relating to child and forced labour.

In December 2020, a claim was filed in the High Court of England and Wales against Imperial Brands PLC, Imperial Tobacco Limited and four of its subsidiaries by a group of tobacco farm workers. Imperial is vigorously defending the claim. As this is an ongoing litigation, we are unable to comment further.



MODERN SLAVERY TRAINING AND AWARENESS

Our modern slavery e-learning course has been developed to support employees understand the issue and explain how to raise concerns on suspected or actual human rights abuses. The programme is available in 14 languages and has been undertaken by thousands of employees from around the world.



MODERN SLAVERY TRAINING AND AWARENESS



Our Code of Conduct is embedded throughout Imperial Brands and drives our responsible approach. It is aligned with the policies, internal controls and risk management processes that underpin our strategy. It also includes our respect for human rights.

In 2024, the Code of Conduct was revised and aligned with our Strategy, Behaviours, ESG Strategy and our Supplier Code. It highlights the importance of Speaking Up about concerns and the value Speak Ups can bring to a strong culture of compliance.

The Code sets out the behaviours we expect from employees in their dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisers, governments and competitors.

At the end of 2024, the refreshed Code has been published in 29 languages.

The roll-out of the Code will continue through FY25, supported by a dedicated learning programme.

Our e-learning course has been developed to support employees understand issues relating to modern slavery and how to raise concerns on suspected or actual human rights abuses. The course is available in 14 languages, including Chinese Traditional, Czech, Dutch, English, French, German, Greek, Italian, Japanese, Polish, Portuguese, Romanian, Spanish, and Ukrainian.

Additionally, in-person training was carried out in Madagascar and Laos throughout the respective crop seasons in 2024. In Madagascar, we reached 100% of our directly contracted farmers, and 92% of seasonal workers on our commercial farms (an increase from 47% in 2023). While in Laos, the training was delivered to 890 directly contracted farmers, representing 98% of the grower base.

Training on sustainable practices and human rights for our Leaf team and directly contracted farmers is an ongoing process. This is complemented by the efforts of the vast majority of our key suppliers, who provide training to farmers throughout the growing season, particularly during peak growing periods. A range of methods are used, such as posters, handbooks, storytelling and kits to help land key messages.

In 2023, as part of our ongoing commitment to continue raising awareness and further enhance our knowledge of human rights and modern slavery, we launched a new ESG digital awareness programme for employees worldwide.

This digital training module focuses on explaining what human rights are, our commitment and role in respecting and promoting human rights, how to recognise the main signs of modern slavery, and how to report potential instances of human rights violations, both internally and externally. We have created specific content for different areas of our business, in particular, operations, procurement, salesforce, and office workers. At the end of the training, we provide a list of additional resources for those employees who wish to expand their knowledge about human rights and modern slavery. Using easy to follow, engaging and informative content, our aim is to raise awareness and encourage our employees to become human rights and modern slavery 'champions'. We believe that further improving employees' understanding of human rights will be instrumental in minimising the risks of potential abuse. This digital training module became mandatory in 2024 for those with a management role and all employees in English-speaking countries. More than 3,950 employees have completed the training.

To further increase awareness about human rights, we delivered 19 webinars across our business, three of which were for our hubs in Poland, conducted in English and Polish, assisted by a translator. Overall, more than 940 employees participated in these sessions.

For the second consecutive year, we partnered with Hope for Justice to host a series of informative sessions on modern slavery. These sessions were conducted in English and French and were attended by more than 230 employees.

To mark Anti-Slavery Week 2024, we launched an internal communication campaign aimed at raising awareness about the complex and multifaceted nature of modern slavery.









Our modern slavery digital course has been developed to support employees to understand the issue and explain how to raise concerns on suspected or actual human rights abuses. Our new human rights digital learning seeks to deepen our commitment and role in respecting and promoting human rights.

PROGRESS AGAINST 2024 COMMITMENTS



In 2024, we enhanced our Human Rights Internal Audit Module and applied it in selected locations. We revised our modern slavery leading indicators, and conducted five audits in priority locations. We rolled out the updated Supplier Code of Conduct and implemented the Third-Party Risk Framework to improve human rights and environmental aspects. We reported on actions to prevent and address human rights issues and conducted our first Conflict Minerals Supplier Assessment to identify sourcing risks.



PROGRESS AGAINST 2024 COMMITMENTS

COMMITMENT	STATUS	COMMENT
Continue to enhance the Human Rights Internal Audit Module, applying it in selected locations (taking a risk-based approach) as part of Imperial Brands' factories and markets audit plan.	Completed 	The Human Rights Internal Audit Module was reviewed during four factory audits in the Netherlands, the Central African Republic, Sweden and Türkiye. Modern slavery was also reviewed as part of four market audits. See pages 23 and 25.
Revisit the wording of our 21 modern slavery leading indicators and create a guidance document to enhance clarity and reporting consistency.	Completed 	Our modern slavery indicators were reframed to Human Rights Leading Indicators (HRLI). We enhanced the description of the indicators with further guidance and examples. See pages 3, 21 and 23.
Introduction of the 21 modern slavery leading indicators to a (risk-based) selection of markets and clusters.	Completed 	Three "clusters" were invited to start reporting against this new set of leading indicators, namely the West Africa cluster, the SEE cluster, and the Australasia cluster. See page 23.
Conduct three audits against our 21 modern slavery leading indicators in priority locations following a risk-based approach.	Completed 	We committed to conducting three in-person modern slavery audits, but we successfully completed five. In the Ivory Coast, we audited our Abidjan printing factory and the Bouaké factory. In the US, we audited our factories in Greensboro and McAdoo. The fifth audit was conducted at our Ain Harrouda factory in Morocco. See pages 3, 23 and 25.
Continue to roll out Imperial Brands' updated Supplier Code of Conduct to current and new suppliers.	Completed 	We successfully continued the rollout of Imperial Brands' updated Supplier Code of Conduct, communicating to our suppliers our values and expectations for their responsible and ethical business practices. See page 3 and 8.
Implement the Third-Party Risk Framework developed in 2022 and obtain ethical trading risk self-assessment questionnaires from our key partner suppliers to better focus on gaps and work with them to make continual improvements in the human rights and environmental aspects of our supply chain operations.	Completed 	We implemented ethical trading risk assessments for our partner suppliers, covering over 60% of our supplier spend. We established a risk-based approach to determine when suppliers need to undergo a Sedex Members Ethical Trade Audit (SMETA) by a verified third-party auditor. Using the audit results, we will collaborate with our suppliers to minimise risks and enhance their overall ESG performance. See page 3 and 8.

PROGRESS AGAINST 2024 COMMITMENTS

COMMITMENT	STATUS	COMMENT
<p>Report on key actions being taken to prevent and address any human rights-related issues arising within our supply chain, whether this information comes through from our own assessments, the industry-wide STP or from independently commissioned Impact Assessments being conducted within tobacco growing communities.</p> <p>We aim to cover our remaining five priority countries with an in-country verification in 2024.</p>	<p>Completed</p> 	<p>We addressed all reported human and labour rights issues from suppliers through the STP. We used the 'Leaf In-Country Verification' methodology to verify supplier information and understand their risk management systems. We conducted verifications in priority countries in 2024 and completed an annual review to improve this process. Seven Supply Chain Impact Assessments (SCIA) were conducted within the leaf supply chain, with supplier action plans in progress for completed assessments. The 'Leaf Partnership' program supported over 128,000 new beneficiaries in priority countries across Africa, Asia, the Americas, and Europe, aiming to help suppliers address the root causes of human rights risks. See pages 3, 19, 26 and 28.</p>
<p>Undertake our first Conflict Minerals Supplier Assessment in order to understand what minerals are used in our supply chain and identify our areas of sourcing risk.</p>	<p>Completed</p> 	<p>We looked at how to minimise the risk of conflict minerals in our supply chain by ensuring that all NGP suppliers complete a Conflict Mineral Reporting Template that allows for the tracing of 3TG in our supply chain. See page 28.</p>

NEXT STEPS IN 2025

We remain committed to strengthening our approach to addressing modern slavery in our operations and supply chain and recognise that this is a continuous, collaborative and evolving process.



NEXT STEPS IN 2025



We remain committed to strengthening our approach to addressing modern slavery in our operations and supply chain and recognise that this is a continuous, collaborative and evolving process.

Our priority aims for FY25 are to:

Perform three in-person and three lighter-touch **human rights audits** to evaluate understanding and reinforce the implementation of our human rights leading indicators.



Set up “Human Rights Corners” in manufacturing sites and markets to promote awareness of our human rights initiatives in local languages.



Report on key actions being taken to prevent and address any human rights-related issues arising within our supply chain, whether this information comes through from our own assessments, the industry-wide STP or from independently commissioned Impact Assessments being conducted within tobacco growing communities.



Aim to enhance and broaden our risk-based assessment approach by expanding the use of Sedex and SMETA audits into more areas of our supply chain, enabling a more comprehensive evaluation of our suppliers and their ethical practices. This expansion will strengthen our commitment to responsible sourcing and improve visibility across all levels of our supply chain.



Cross-functional collaboration on a human rights audit within FY25 to help continue to improve GIA’s understanding and capability in this area, as well as enhance the existing audit module content where necessary. Apply the audit module on selected audits (taking a risk-based approach), as part of Imperial Brands’ audit plan.





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