



Human Rights Governance

CONTENTS

A. Accountability and oversight	3
B. Human Rights External Advisory Board	3
C. Business Ethics Committee	4
D. Human Rights Liaisons Network	4
E. Supply Chain Due Diligence Committees	4
F. External Experts	4

Given the breadth of our operations around the world, it is critical that we have the appropriate governance for embedding human rights throughout our entire organization.

A. Accountability and oversight

We have built a governance structure to ensure firm oversight of the JT Group Human Rights Policy and JTI Human Rights Commitment by our management. At the same time, a broad network of actors directly leads its implementation. While the JT Group Board of Directors and JT Group CEO are accountable for the strategy, governance, and reporting of adherence to the JT Group Human Rights Policy, the JTI CEO has approved of the JTI Human Rights Commitment, with the JTI CFO upholding executive ownership.

The Corporate Sustainability and Leaf Global Supply Chain teams own the human rights strategy and its targets and are accountable for the implementation of the due diligence program. At the country level, General Managers and Factory Leads are accountable, while Local Human Rights Liaisons under Legal teams are responsible for coordinating the implementation of the action resulting from human rights assessments. Local Supply Chain Due Diligence Committees are responsible for overseeing the development and implementation of country-level strategy and policies on sustainability, including advancing the respect for human rights.

B. Human Rights External Advisory Board

Made up of international experts on business and human rights, the Board advises us on all issues that the members consider relevant for the implementation of our human rights strategy. The panel of experts guide us with their expertise and challenge us where they believe we need to improve, helping to strengthen our efforts to deliver on our human rights commitments.

We have implemented several key changes to our due diligence strategy based on the Advisory Board's expert guidance and recommendations. These changes included:

- Developing our new country-level prioritization matrix, after the Board identified a need to add a "salient issues" lens to the prioritization criteria
- Creating a smart self-assessment questionnaire as a means of engaging with more countries on human rights
- The Board supporting JTI in the approach to market assessments and action plans
- The Board advising JTI to continue pursuing a step-by-step approach in increasing human rights-related disclosure
- The Board supporting proper analytics tracking in the setting up of the human rights e-learning

Board members include :

- Paul Bowden (Professor of Law, The Nottingham Law School)
- Donna L. Westerman (Sustainable Purchasing Leadership Council)

Policy document title

- Rona Starr (Association for Professional Social Compliance Auditors)
- Jonathan Drimmer (Paul Hastings)
- Richard Karmel (Mazars)

C. Business Ethics Committee

Composed of eight JTI Vice Presidents from across different functions and chaired by the Chief Compliance Officer, this committee oversees and decides on the most complex cases brought to the attention of Business Ethics.

D. Human Rights Liaisons Network

Comprised of employees from countries that have been engaged in on-site or remote due diligence assessments, this network facilitates the implementation of human rights action plans, sharing of guidance and best practice.

E. Supply Chain Due Diligence Committees

Working across the Leaf operations ensures meaningful processes are developed and implemented to act on the assessment findings. Led by senior management, the committees are crucial to ensuring that we meet our long-term improvement objectives.

F. External Experts

Working with organizations such as Business for Social Responsibility and twentyfifty enables us to have the technical support as we strive for continual improvement in our human rights strategy and our approach to due diligence.