



Our compliance risk management actions

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A. Our Compliance department

At JTI we have a Compliance department led by the JTI Chief Compliance Officer. Our Compliance department supports employees with various compliance programs and training courses to guide them to act with integrity and make decisions in compliance with all applicable laws and internal policies, and to mitigate reputational, legal and financial risks for our international business.

B. Anti-bribery and corruption

We take a zero-tolerance approach to bribery, corruption, and other financial crime, and we actively manage risks related to these areas.

To mitigate the risks of bribery, corruption, and financial crime we have updated our corporate compliance procedures, to ensure we continuously improve the way we manage these risks. The Employee Disclosure and Declarations procedure and programs include risk mitigation associated with Conflicts of Interest and Gift, Hospitality and Entertainment. In addition, the Know Your Business Partner procedure includes programs which mitigate risks from business partners associated with government and government officials. Furthermore, the Preventing Financial Crime procedure mitigates risks associated with money laundering, tax evasion, facilitation of tax evasion and terrorist risk financing.

C. Anti-competitive behavior

We have a policy with detailed guidelines in place to ensure that our business is conducted fairly and in compliance with competition laws at all times. The policy requires our employees to conduct business in an ethical manner and in compliance with competition laws. For example, all personnel are required to determine JTI's commercial strategies and take decisions independently from our competitors and in the interest of JTI alone, without consultation, influence by, or access to competitors' competitively sensitive information.

In addition, we do not enter into agreements with competitors or third parties operating at different levels within the supply chain (e.g. trade customers, such as distributors or retailers) that have as their aim or effect the prevention, restriction or distortion of competition. Our customers must be free to make their own business decisions concerning their customers and how they compete in the market.

We have developed extensive training materials. Our employees are required to attend regular training sessions on compliance with competition laws and our policy.