



**BRITISH AMERICAN TOBACCO KENYA PLC  
(‘the Company’)**

**STAKEHOLDER ENGAGEMENT POLICY**



#### 1) **PURPOSE OF THIS POLICY**

The CMA Code of Corporate Governance Practices for Issuers of Securities to the Public 2015 (the Code) requires the Board to develop strategies and suitable policies to manage relations with different stakeholder groups.

The purpose of this Policy is to establish the principles and framework through which BAT Kenya engages with its stakeholders in a transparent, ethical, timely and constructive manner. This Policy seeks to:

- a) strengthen stakeholder trust and confidence;
- b) support sustainable value creation;
- c) enhance accountability and responsible corporate citizenship;
- d) promote effective communication;
- e) support sound governance and decision-making; and
- f) ensure compliance with applicable legal, regulatory and governance requirements.

#### 2) **POLICY STATEMENT**

We recognize that sustainable business success depends on maintaining strong, respectful and mutually beneficial relationships with our stakeholders. To this end, we are committed to:

- a) engaging stakeholders fairly, respectfully and transparently;
- b) considering stakeholder interests in decision-making processes;
- c) ensuring timely, accurate and balanced communication;
- d) promoting ethical conduct and integrity in all engagements;
- e) fostering open dialogue and constructive feedback; and
- f) embedding stakeholder considerations into the Company's governance, strategy and sustainability agenda.

#### 3) **SCOPE OF THE POLICY**

This Policy applies to:

- a) the Board of Directors;
- b) Management;
- c) Employees;
- d) contractors and consultants acting on behalf of the Company; and
- e) any authorised representatives engaged in stakeholder interactions.

The Policy covers engagement with both internal and external stakeholders, and sets out the principles, standards and processes through which stakeholder concerns, feedback and expectations shall be addressed.

Implementation of this Policy shall remain the responsibility of the Board, Management and employees/contractors of the Company, as set out in Clause 9 of this document.

#### 4) **STAKEHOLDER IDENTIFICATION**

Our key stakeholders include, but are not limited to: our consumers; customers; our people shareholders and investors; society; and suppliers.



The Company shall periodically review and update its stakeholder mapping to reflect evolving business priorities and stakeholder expectations.

## 5) **WHY STAKEHOLDER ENGAGEMENT IS IMPORTANT FOR US**

We work with, take into account and respond to the views and concerns of our stakeholders. This enables us to adapt to emerging risks and work to meet the expectations placed upon us as a multinational business.

- a) Consumers: 'Love our Consumer' is one of our values and consumers are the core of everything we do. As our industry evolves, and preferences and attitudes change, understanding our adult consumers is crucial to both successful portfolio and business growth. Consumer-led product innovation is central to achieving our purpose and we believe that our multi-category approach is the most effective way to meet the diverse preferences of adult nicotine consumers worldwide.
- b) Shareholders: Maintaining the support of our shareholders is essential for us to maintain access to capital. This allows us to implement our strategy and achieve our business objectives.
- c) People: The quality of our people is testament to our Group's continued performance. We understand the value of listening and responding to feedback from our people to maintain a fulfilling, rewarding and responsible work environment. Fostering an exciting winning organization is a core part of the Dynamic Business pillar of our strategy.
- d) Suppliers: Effective relationships with farmers and suppliers of tobacco leaf, product materials as well as indirect goods and services are essential to an efficient, productive and secure supply chain and promote an ecosystem for innovation.
- e) Customers: Our customers include retailers, global and local key accounts, distributors and wholesalers that are essential for driving growth and embedding responsible marketing practices.
- f) Society: We seek to be part of the debate that shapes the regulatory environment in which we operate, and to work collaboratively to develop joint solutions to common challenges. We recognise our responsibility to society to reduce the health, environmental and social impacts of our business. We seek to contribute to debate on tobacco harm reduction (THR) and the regulatory environment in which we operate, recognising that meaningful change requires partnerships between governments, regulators and industry.

## 6) **GUIDING PRINCIPLES ON STAKEHOLDER ENGAGEMENT**



- a) **Transparency:** The Company shall provide clear, accurate, timely and balanced information to stakeholders, subject to legal and commercial confidentiality obligations.
- b) **Integrity and Ethics:** All stakeholder engagements shall be conducted in a manner consistent with the Company's values, Standard of Business Conduct, Principles of Engagement and applicable laws.
- c) **Accountability:** The Company shall remain accountable for its decisions, actions and impact on stakeholders.
- d) **Inclusivity:** The Company shall seek to engage relevant stakeholders fairly and meaningfully, taking into account diversity of perspectives and interests.
- e) **Responsiveness:** The Company shall endeavour to understand, acknowledge and appropriately respond to stakeholder concerns and expectations.
- f) **Sustainability:** Stakeholder engagement shall support the Company's long-term sustainability objectives and responsible business practices.

## 7) **STAKEHOLDER ENGAGEMENT FRAMEWORK**

The Company may engage stakeholders through various channels including:

- Annual General Meetings;
- Investor briefings and market disclosures;
- Public Policy Stakeholder consultations and dialogue forums
- Regulatory engagements;
- Employee forums including town halls and internal communication platforms;
- Sustainability and community engagement initiatives;
- Supplier engagements;
- Market research activities;
- Digital and social media platforms;
- Surveys and feedback mechanisms;
- SpeakUp Channels; and
- Public statements and media engagements.

Stakeholder engagement approaches shall be proportionate to:

- the nature of the stakeholder relationship;
- the significance of the issue; and
- the potential impact on the Company and its stakeholders.

## 8) **COMPLIANCE**

The Company shall ensure strict adherence to all relevant Kenyan laws, regulations, and international standards governing stakeholder engagement and corporate responsibility.

## 9) **RESPONSIBILITIES FOR IMPLEMENTATION OF THE POLICY**

- a) **Board of Directors** - The Board shall:
  - oversee the effectiveness of stakeholder engagement practices;
  - promote a stakeholder-conscious governance culture;



- consider material stakeholder matters in strategic decision-making; and
- monitor stakeholder-related risks and opportunities.

b) **Board Committees**

The relevant Board Committees shall oversee stakeholder matters within their mandates, including governance, sustainability, risk and ethics matters.

c) **Management** – Management shall:

- implement this Policy;
- coordinate stakeholder engagement activities;
- ensure consistency and quality of stakeholder communications; and
- escalate material stakeholder matters to the Board where appropriate.

d) **Employees/Contractors** – Employees/contractors are expected to:

- uphold the Company's values in stakeholder interactions;
- communicate responsibly and professionally, within the Company's communications protocols in place; and
- comply with all applicable policies and confidentiality obligations.

10) **COMMUNICATION AND DISCLOSURE**

The Company shall ensure that stakeholder communications:

- are accurate, clear and not misleading;
- comply with applicable disclosure obligations;
- safeguard confidential and commercially-sensitive information;
- support fair and equitable access to information; and
- are undertaken by authorised spokespersons where appropriate.

All material disclosures shall be made in accordance with applicable legal and regulatory requirements.

11) **GRIEVANCE, WHISTLEBLOWING AND FEEDBACK MECHANISMS**

We are committed to maintaining appropriate channels through which stakeholders may:

- raise concerns;
- provide feedback;
- report unethical conduct; or
- seek clarification on Company matters.

Our Standards of Business Conduct (SoBC) cover key compliance matters, as well as our approach to external stakeholders. It is supplemented by our Supplier Code of Conduct (SCoC) which defines the minimum standards expected of our suppliers in key areas, including compliance, human rights and business integrity and cyber-risk.

Our SoBC and SCoC make it clear that our employees, business partners and suppliers should Speak Up if they have a concern about actual or suspected wrongdoing. We do not tolerate



harassment, victimisation or reprisals of any kind against anyone raising a concern, as such conduct is itself a breach of our SoBC.

Anyone can use Speak Up, including employees; contractors; contingent workers; business partners; customers; suppliers, and their workers. People can raise concerns (anonymously if preferred) through our confidential, independently managed online and telephone 'Speak Up' channels, available 24 hours a day, details which may be accessed on our website.

Within BAT, concerns can be raised via Human Resources, their line manager or a Designated Officer. Not all concerns involve breaches. Some relate to questions regarding the SoBC.

For substantiated breaches, we take appropriate disciplinary actions, ranging from formal written warnings to the termination of employment. Where appropriate, we will report matters to the relevant authorities.

We are committed to handling all stakeholder concerns fairly, confidentially and in accordance with applicable policies and procedures.

## 12) **MONITORING AND REPORTING**

The Company shall periodically:

- assess the effectiveness of stakeholder engagement activities;
- review emerging stakeholder expectations and material issues;
- monitor stakeholder-related risks and trends; and
- provide relevant stakeholder engagement updates to the Board.

Material stakeholder matters may be disclosed in the Company's:

- Annual Report;
- Sustainability Report;
- Website or
- other appropriate disclosures.

## 13) **RELATED DOCUMENTS**

- Standards of Business Conduct (SoBC)
- Supplier Code of Conduct (SCoC)
- Principles for Engagement
- Responsible Marketing Principles
- Gifts and Entertainment Policy

## 14) **POLICY REVIEW AND APPROVAL**

- a) The Nominations and Governance Committee of the Board will review this policy at least once every two (2) years or more frequently as required to ensure it remains consistent with the Board's objectives and responsibilities.
- b) The Nominations and Governance Committee will discuss any revisions that may be required and recommend any such revisions to the Board for approval.

**The Nominations and Governance Committee reviewed this Policy on 20<sup>th</sup> May 2026.**



**The Board approved and adopted this Policy on \_\_\_\_\_ 2026.**