



Principles for Engagement

British American Tobacco is committed to corporate transparency. It recognises that as a responsible company, all engagement activities that it undertakes must be guided by internal standards.

The principles and standards set out herein form British American Tobacco's 'Principles for Engagement'. All Group companies and employees are required to act in accordance with the Principles for Engagement. British American Tobacco does support third parties on policy issues of mutual interest, but will never ask a third party to conduct itself in any way that contravenes these 'Principles for Engagement'.

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Civic participation is a fundamental aspect of responsible business and policy making, and British American Tobacco employees will participate in the policy process in a transparent and open manner, in compliance with all laws and regulations of the markets in which it operates.

The Group has a legitimate role to play in legislative developments that affect its operations and supports the Organisation for Economic Co-operation and Development's (OECD) Principles for Transparency and Integrity in Lobbying¹.

Engagement with politicians, policy makers and regulators, when carried out transparently and with high regard for accuracy, allows for the best information to be used as a foundation for decisions in policy making.

Employees will contribute to the policy-making process by providing valuable data and insights in a transparent and accurate manner in order to encourage that regulations are developed with the help of all available information.

All employees are expected to adhere to high professional standards of transparency and integrity.

These Standards apply to all directors, officers and permanent employees of Group companies, but also to secondees, trainees, those on work experience and other temporary staff. If employees are responsible for engaging and/or supervising individuals in such roles, they should ensure that they are familiar with these Principles and their obligations under them.

When engaging with external stakeholders, Group companies and employees must ensure that:

- They always identify themselves by name and corporate affiliation;
- They do not, directly or indirectly, offer, promise or give any gift, payment or other benefit to any person for the purposes of inducing or rewarding improper conduct or influencing any decision by a public official to the advantage of the Group or any Group company; and
- Information will never be obtained by dishonest means

No Group employee will ask a third party to act in any way that contravenes these Principles of Engagement.

British American Tobacco shall publicly acknowledge its support of third party organisations, subject to commercial confidentiality requirements and data protection laws.

Group employees will conduct all external engagement through accurate evidence-based communication.

Employees should endeavour to share accurate, complete, and evidence-based information to regulators in order to best inform decision making.

The Group is committed to a leadership role within the industry and to advocating the adoption of the Principles for Engagement by other organisations.

Employees will be properly educated to ensure that they understand and execute the Principles for Engagement effectively.

When conducting external engagement, employees will endeavour to offer constructive solutions.

Employees should offer constructive solutions that will best meet the objectives of regulation while minimising any negative unintended consequences.

¹ <http://www.oecd.org/corruption/ethics/Lobbying-Brochure.pdf>