Imperial Tobacco Group
International Standard for the Marketing of Tobacco Products

STATEMENT OF PURPOSE

Imperial Tobacco Group PLC (the "Group") believes that tobacco products are for adults. The Group is committed to promoting and selling its products responsibly, within the laws and voluntary agreements of those countries in which it operates.

This International Standard for the Marketing of Tobacco Products (this "Standard") reinforces this commitment and sets out clear rules and principles to ensure that Group companies advertising and promotional activities are directed only to adult consumers of tobacco products in all circumstances.

For the purpose of this Standard, Tobacco Products are defined as manufactured cigarettes, fine cut tobacco, cigars, cigarillos, pipe tobacco, pre-formed tobacco rolls, chewing tobacco, oral and nasal snuff, as well as snus.

Wherever and whenever dialogue is possible, Group companies will seek to encourage governments and other relevant authorities in the markets in which they operate to incorporate the practices laid out in this Standard into national laws and agreements, respecting the principles of informed adult choice and commercial communication.

The Group supports the enforcement of legal minimum age restrictions by the appropriate authorities for the purchase of Tobacco Products.

SCOPE

All Group companies and employees worldwide shall observe and enforce this Standard, both in letter and in spirit. Where the Group does not have a controlling interest, it will nonetheless endeavour to implement this Standard.

This Standard will apply also to all advertising, promotion and research agencies employed directly by Group companies, as well as any third parties engaged in the marketing, sale and distribution of Tobacco Products.

All national laws, codes of practice and voluntary agreements relating to Tobacco Products to which Group companies are signatories will continue to be observed where they apply. However, where such requirements are less stringent than this Standard, then this Standard will take precedence, unless otherwise required by law. The adoption or absence of a national code shall not in any way relieve the obligation to comply with this Standard.

This Standard does not prohibit the Group from displaying images of its products, brands, packaging or advertising in corporate communications such as Annual Reports and Accounts where such communications are not designed for marketing purposes of Tobacco Products.

This Standard does not prohibit the Group from displaying images of its products, brands, packaging or advertising for purposes of historical interest, including displays of historical material or the inclusion of tobacco memorabilia in publications or exhibitions by third parties where such communications and displays are not designed for marketing purposes of Tobacco Products.

This Standard does not apply to communications between Group companies and the tobacco trade.

For the purpose of this Standard, an adult is defined as someone who is aged 18 years or over, unless a higher minimum age is specified by local law or voluntary agreement.

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THE STANDARD

Style and Content of Tobacco Product Brand Advertising

1. Tobacco Product brand advertising will not:
   - be aimed at or particularly appeal to those under 18 years of age (or higher minimum age where specified locally);
   - encourage anyone to become a consumer of Tobacco Products; or
   - discourage consumers of Tobacco Products from giving up.

2. The content of Tobacco Product brand advertising will not:
   - be aimed at or particularly appeal to those under 18 years of age (or higher minimum age where specified locally);
   - feature a celebrity or contain a celebrity endorsement where that celebrity is believed to appeal more to young people under 18 years of age than to the population as a whole;
   - suggest that the consumption of Tobacco Products enhances popularity, sporting, professional or sexual success;
   - suggest that most people consume Tobacco Products;
   - suggest that the consumption of Tobacco Products is a healthy activity.

3. Any person appearing in Tobacco Product brand advertising shall be - and shall appear to be - aged 25 years or over.

Health Warnings

4. Where Tobacco Product brand advertising is permitted, each advertisement will contain an appropriate health warning as specified by local law or voluntary agreement. Where not specified, all new advertising will carry a current and commonly used health warning for the tobacco product category of the market or duty free area in which the advertising will appear. The use of such warnings shall not cause a misleading impression as to the origin of the advertised Tobacco Product.

   Such health warnings shall:
   - appear in the most appropriate local language;
   - be clearly visible or audible; and
   - include an attribution to the legal source of the health warning, if applicable and legally permissible.

5. On all packs of Tobacco Products manufactured and/or marketed by Group companies as well as on any outer packaging intended to be presented to the consumer, an appropriate health warning will appear. This warning will conform to the relevant law or voluntary agreement of the country or market for which the product has been manufactured, including duty free areas. Where no local law or voluntary agreement exists, a current and commonly used health warning for the product category of the market or duty free area in which the tobacco product is
intended to be marketed shall be used. The use of such health warnings shall not cause a misleading impression as to the origin of the Tobacco Product

Such health warnings shall

• appear in the most appropriate local language;

• be clearly visible; and

• include an attribution to the legal source of the health warning, if applicable and legally permissible.

Printed Media

6. No Tobacco Product brand advertising will be placed in printed media unless satisfactory evidence has been provided that at least 75% of the readers are adults.

7. Where Tobacco Product brand advertising is permitted in printed media, each advertisement will contain an appropriate health warning in accordance with paragraph 4.

Outdoor Advertising

8. No Tobacco Product brand advertising will be placed on outdoor signs or billboards which are closer than 100 meters to the main entrance of schools used predominantly by those under 18 years of age (or higher minimum age where specified locally). This does not include outdoor signs at the point of sale.

9. Where Tobacco Product brand advertising is permitted on outdoor signs and billboards, each advertisement will contain an appropriate health warning in accordance with paragraph 4.

Point of Sale Material

10. Unless specified differently by local law or voluntary agreement, all new point of sale material, the advertising display area of which exceeds 250 square centimeters, will carry an appropriate health warning in accordance with paragraph 4. Branded items that are given to consumers are excepted from this rule.

Radio, Television and Cinema Advertising

11. Where tobacco brand advertising is permitted on radio or television, it will be broadcast only during those hours and when the programming is directed primarily at those aged 18 or over (or higher minimum age where specified locally).

12. Where Tobacco Product brand advertising is permitted in cinemas, it will not be shown when the audience is likely to comprise mainly young people under the age of 18 (or higher minimum age where specified locally).

13. Where Tobacco Product brand advertising is permitted on radio, on television or in cinemas, each advertisement will contain an appropriate health warning in accordance with paragraph 4.

Product Placement

14. No payment shall be made for the placement of the Group's Tobacco Products, brands or advertisements in any film, television programme or any other public performance or entertainment medium for viewing by the general public.
Internet Advertising

15. There will be no Tobacco Product brand advertising on the internet unless pre-site access adult verification methods are in place and the content or services of the internet site are directed at those countries where such advertisements are not prohibited by law. In the case of internet ad banners on online media, it is sufficient that satisfactory evidence has been provided that at least 75% of the users are adults.

16. Where adult verification has been obtained, all Tobacco Product brand advertisements must contain a health warning appropriate to the country of destination of the internet site in accordance with paragraph 4.

Video Tapes, Audio Tapes, CDs, DVDs and Computer Games

17. No Tobacco Product brand advertising will be included in material published on video tapes, audio tapes, CDs, DVDs, computer games or any other similar medium unless satisfactory measures are in place to ensure that the item is intended only to be provided to adults.

18. Where Tobacco Product brand advertising is permitted in material published on video tapes, audio tapes, CDs, DVDs, computer games or any other similar medium, each advertisement will contain an appropriate health warning in accordance with paragraph 4.

Promotional Events and Activities

Group companies undertake a range of events and activities which are created specifically to raise awareness of a particular brand or brands of Tobacco Products amongst adult consumers, and which would not take place without the support of Group companies. These do not include pre-arranged events for which the organisers subsequently sought Group companies’ support and whose continued success does not depend solely on Group companies as long as no Tobacco Product brand promotion takes place, nor do they include corporate events and activities where no tobacco brand promotion is intended.

19. Where Tobacco Product brand promotional events and activities are permitted, they will be conducted so as to comply with this Standard.

20. Sampling of Tobacco Products will be restricted to existing consumers aged 18 years or over (or higher minimum age where specified locally).

21. Access to Tobacco Product promotional events will be restricted to adults.

22. No Tobacco Product promotional activity or event will be aimed at or particularly appeal to anyone under 18 years of age (or higher minimum age where specified locally).

23. Tobacco Product brand promotional activities will be directed only to those verified to be aged 18 years or over (or higher minimum age where specified locally).

24. All personnel employed directly or indirectly in Tobacco Product brand promotional events and activities, including sampling, shall be and appear to be aged 21 years or over.

25. Tobacco Product brand promotional items bearing tobacco brand names or logos shall not be sold or given away to those under 18 years of age (or higher minimum age where specified locally).
26. Tobacco Product brand promotional clothing will only be made available in adult sizes.

27. All Tobacco Product brand promotional offers shall be directed only to adult consumers. Where such an offer permits an adult consumer to be accompanied by other persons at an event or activity, those accompanying the adult consumer must themselves be adults.

**Sponsorship**

Group companies provide sponsorship support for a range of sporting and cultural events, activities and teams in order to raise awareness of a particular tobacco brand or brands amongst adult consumers, but without which support the event, activity or team would still exist or take place.

28. Where Tobacco Product brand sponsorship is permitted, all advertising and promotional activities related to the sponsorship will be conducted so as to comply with this Standard.

29. No new sponsorships will be entered into for any event, activity, team or individual unless satisfactory evidence has been provided that all competitors, team members and active participants are adults.

30. Tobacco Product brand sponsorship, clothing and materials will not be provided for any event, activity, team or individual which has greater appeal to young people than to adults.

**Direct Mail**

31. The marketing of Tobacco Products by direct mail will be directed only to verified adult consumers. All reasonable measures will be taken to ensure that those under 18 years of age (or higher minimum age where specified locally) are excluded from all direct mailing lists.

32. Where Tobacco Product brand advertising is permitted by direct mail each advertisement will contain an appropriate health warning in accordance with paragraph 4.

**Use of Brand Names and Logos by Third Parties**

33. Wherever possible, measures will be taken to prevent third parties from using the Group’s tobacco trademarks and registered designs without authorisation, or in a manner which undermines the principles of this Standard.

**Product Market Research**

34. Tobacco product concept, advertising and promotion research will only be commissioned amongst adult consumers.

**Implementation and Compliance**

35. It is the responsibility of all Group companies and Business Units to establish effective mechanisms to ensure that employees and agencies and other relevant third parties understand, implement and comply with the Standard. Group companies and Business Units are expected to begin applying this updated Standard on 31st October 2009 and to confirm full adherence no later than 31st October 2010, insofar as the application of this Standard is not in breach of any local relevant laws.

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36. Where the Group acquires the controlling interest of a company after 31st October 2009, the Group’s Sales & Marketing Director will issue the Standard to that company which is then expected to confirm full adherence no later than 12 months after issuance of the Standard, insofar as it is not in breach of any local relevant laws.

37. Employees will be made aware of their obligations to this Standard through its publication on the Group’s intranet, through the distribution of copies of this Standard through relevant channels and through reference to the Standard in training and development programmes.

38. All advertising, promotion, sampling and research agencies employed directly by Group companies shall be provided with copies of this Standard. Each agency shall be advised that its appointment and representation on behalf of Group companies shall be contingent upon compliance by each such agency (including its employees) with the Standard. Reference to the Standard should be included in all contracts and agreements with such agencies as well as any third parties engaged in the marketing, sale and distribution of the Group’s Tobacco Products.

39. A copy of this Standard will be provided to all relevant external local law firms and all Tobacco Product brand advertising material signed off by them must conform to this Standard.

40. The Group will take appropriate action against any employee who knowingly or negligently violates this Standard.

41. Any significant questions of interpretation that cannot be resolved locally should be addressed to the Group Legal Department for clarification. Group Legal will have ultimate responsibility for matters of interpretation of this Standard.

42. Any significant breach of this Standard, whether accidental or otherwise, shall be reported to Group Legal, as soon as reasonably practical.

43. A regular Company-wide review will be undertaken to ensure consistency of implementation and interpretation of this Standard.